

## 27. WHISTLE BLOW POLICY

### 27.1 INTRODUCTION

Agritech Limited ("AGL", "Company") is committed to high standards of ethical, moral and legal business conduct and professional integrity. We believe that ethical business conduct is the responsibility of everyone working for and on behalf of AGL. In line with this commitment, the Company encourages open communication and voluntary reporting of irregularities and wrongdoings.

### 27.2 OBJECTIVE

This Policy aims to establish a "Speak-Out" mechanism and encourage and enable the employees and all stakeholders to raise concerns with regard to any deviations from acceptable and ethical business conduct, any wrongdoing or malpractice within the company, without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

The Company expects its employees, customers, suppliers and contractors to not only abide by its standards of business conduct but also to speak out about any concerns they have regarding business ethics, health & safety, environmental performance, harassment and other business related matters or other possible breaches of compliance.

### 27.3 SCOPE

This Policy covers situations where an individual (the whistle-blower) raises a concern about a risk, malpractice or wrongdoing or any activity that he/she considers to be illegal or dishonest, in connection with the Company business. All employees, customers, suppliers and contractors at AGL are encouraged to report serious concerns that could have a significant impact on the Company, such as actions that

- are unlawful or may damage the reputation of AGL
- are fraudulent and lead to a loss of assets
- may be intended to result in incorrect financial reporting
- are in violation of various corporate policies governing business conduct
- are in violation of Safety Health & Environmental standards applicable to the business
- give rise to harassment, discrimination or other unfair employment practices
- Insider Trading
- Non-adherence to the principles of AGL's Code of Conduct

It should however be noted that this "Speak-Out" program is not intended to be used for reporting career related issues, e.g., lack of promotion, or personal grievances, for which a separate mechanism exists.



Head of HR & Sustainability



Chief Executive Officer

## 27.4 HOW TO RAISE A CONCERN

You may raise your concern by telephone, in person or in writing (either through regular mail or by hand). However in case of verbal intimation through hotline, the said person will be asked to bring it in writing in either way i.e. email or regular mail. There is no need to intimate only verbal intimations to Chairman BAC. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates, if known)

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within the Company and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite a colleague of yours to be present for support during any meetings or interviews in connection with the concerns you have raised.

If complaint has to be raised against Manager Internal Audit, the same will be sent to CEO who will bring it into knowledge of Chairman BAC.

Company has set up a hotline and an email ID for reporting irregularities and unethical actions by anyone associated with AGL in any capacity.

Hotline:042-35860340

Email: [Speak.Out@pafl.com.pk](mailto:Speak.Out@pafl.com.pk)

Every email received on the above ID will also have automatic forwarding to the email ID of Chairman, Board Audit Committee (BAC) who shall authorize further action on the complaint received.

## 27.5 ACTION ON A CONCERN RAISED

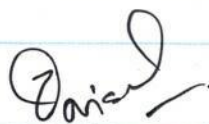
Manager Internal Audit shall be responsible for receiving phone calls and emails for this purpose. If any Whistle Blow communication is received by an employee other than Manager Internal Audit, he is responsible for immediate forwarding the same to Manager Internal Audit. Manager Internal Audit shall report each whistle-blow complaint to Chairman, BAC notwithstanding the fact Chairman BAC is already in the loop. Manager Internal Audit shall ensure that all such calls/emails are received/acknowledged, and a record/log is maintained of these complaints/reports as well as results of the actions taken in connection therewith.

For investigation/action on each individual complaint, Chairman BAC shall decide whether to refer it to Chief Executive Officer, Internal Audit or an external resource. In doing so, he/she may have a consultation with other member of the BAC.

Initial Fact Finding Committee will be made as per Instructions of Chairman BAC. Fact Finding Committee shall give its findings to Chairman BAC through Manager Internal Audit.



Head of HR & Sustainability



Chief Executive Officer



Investigation shall be recommended by Chairman BAC only if available information and findings of Fact Finding Committee are sufficiently specific and contains corroborative evidence to warrant an investigation.

Employees, customers, suppliers, contractors and all other external stakeholders are encouraged to report any improper, unethical or illegal conduct of any employee/representative of the Company.

The person being complained against will be given every possible opportunity of being heard and explain their position. Throughout this process:

- Whistle-blower will be given full support from senior management
- The concerns raised will be taken seriously, and  
The Company will do all it can to help them throughout the investigation

Concerns expressed anonymously are much less powerful but they may be considered at the discretion of the Chairman BAC. In exercising this discretion the factors taken into account would include:

- seriousness of the issue raised
- apparent credibility of the concern, and
- likelihood of corroborating the allegation from other sources

Whistle Blow case shall be concluded within 30 days of lodging the complaint. However, in case of any detailed Investigation, it may take more time till the satisfactory conclusion is drawn.

#### **27.6 CONFIDENTIALITY AND PROTECTION AGAINST ANY RETALIATION**

The confidentiality of the whistle-blowers will be ensured and the person will be protected from any form of retaliation or victimization for genuinely held concerns that are raised in good faith. Strict legal action shall be initiated against anyone trying to harm (in any manner whatsoever including adverse employment action such as termination, threats of physical harm, or any kind of bias in commercial/business dealings) against any whistle-blower. A whistle-blower who believes he/she is being retaliated against shall report the matter at the Speak-Out hotline/email.


Confidentiality of the whistle-blower will be ensured in all cases. However, depending on individual cases, identity may have to be disclosed to conduct a thorough investigation or to comply with the law.

If an allegation is in good faith and reasonably believed it to be true, but it is not confirmed by the investigation, the Company will recognize the concern and the Whistle Blower will have nothing to fear. At the same time, unfounded allegations made recklessly, maliciously or knowing that they were false can expose the complainant to disciplinary/legal action. A whistle-blower is expected to exercise sound judgment to avoid baseless allegations

AGL undertakes that all reporting cases will be investigated confidentially by independent persons and, where possible (if complaint is not anonymous), feedback will be provided to the whistle-blower within 07 days of receiving a complaint indicating that matter will be dealt as per Company Policy.

Manager Internal Audit / Fact Finding Committee / is not allowed to disclose internal concerns to any of the external bodies unless the concern raised involves legal provisions or disclosure is required by law.

  
Head of HR & Sustainability

  
Chief Executive Officer

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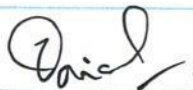
All Whistle Blow incidents and actions taken thereon will be brought into the knowledge of Chairman BAC by Manager Internal Audit on quarterly basis during BAC meetings. Chairman BAC will then decide which case to be forwarded to BOD.

#### **27.7 WHISTLE BLOW TRAININGS**

- Training and awareness sessions of employees, and supervisors / managers shall be conducted periodically.
- Whistleblowing Policy shall be communicated to all new inductions together with their respective joining letter by HR.
- Incoming Directors shall be communicated the Whistleblowing Policy and awareness sessions of the Board shall be conducted by the Secretary Office, as appropriate.



Head of HR & Sustainability



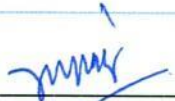
Chief Executive Officer

DEFINITIONS**Definitions**

In this Policy unless there is anything repugnant in the subject or context of its usage, the following expressions shall carry meanings hereunder assigned to them namely:

- “Allegations” means accusing before proving with evidence.
- “CEO” means the Chief Executive Officer of AGL.
- “Concern” means the information about any alleged fraud, improper conduct or wrongdoing.
- “External Bodies” means any external person or group of persons or any state regulatory body or institution.
- “Fraud” means the commission of an illegal act or omission of legal duty by an employee of the company either for personal gain or for deliberately causing loss to the company.
- “Improper conduct or Wrongdoing” is defined as any fraudulent activity / theft / corruption, a substantial mismanagement of Company resources, any other violation of Company’s Code of Conduct, core values, misuse of Company’s fund / assets / belongings, a civil wrong or criminal act, improper conduct in Company’s operations; accounting; internal controls, auditing, or financial reporting and act detrimental to the interests of the company.
- “Victimization” means unwarranted singling out of an employee or group of employees or subjection to crime, exploitation, tort, unfair treatment, or other wrong.
- “Whistleblowing” means the voluntary disclosure of a concern by a whistleblower to the whistleblowing unit.
- “Whistleblower” means any employee, director, related officer, contractor, service user, customer, an ex-employee or any member of public, who makes or attempts to make a disclosure of improper conduct or wrongdoing or fraud to the Whistleblowing Unit.

This version of the policy was approved by the Board of Directors in its meeting held on 23 October 2025.

  
 Head of HR & Sustainability

  
 Chief Executive Officer

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