

Whistleblowing Policy

Policy Statement:

HF Recycle Limited is committed to maintaining the highest standards of integrity, transparency, and ethical conduct. We encourage all employees and stakeholders to report any concerns, wrongdoing, or potential violations of laws, regulations, or company policies. This Whistleblowing Policy outlines the process and protections for individuals who raise such concerns in good faith.

1. Reporting Mechanism: We provide a confidential and accessible reporting mechanism that allows employees, contractors, suppliers, customers, and other stakeholders to report concerns, including but not limited to:

- Criminal activities
- Violations of laws and regulations
- Financial improprieties
- Fraudulent practices
- Unethical behavior
- Health and safety violations
- Environmental concerns
- Discrimination or harassment
- Retaliation against whistleblowers

2. Protection and Non-Retaliation: HF Recycle Limited is committed to protecting individuals who raise concerns in good faith. Whistleblowers will be protected from retaliation, discrimination, or any adverse action as a result of their report. Any retaliation against whistleblowers is strictly prohibited and will be treated as a serious violation of company policy.

3. Confidentiality: We understand the importance of maintaining the confidentiality of whistleblowers and the information they provide. All reports and related information will be handled confidentially to the extent permitted by law. Limited disclosure may be necessary to conduct a thorough investigation or comply with legal requirements.

4. Investigation and Follow-Up: Reports received under this policy will be promptly and impartially investigated. The investigation will be conducted in a fair, objective, and confidential manner. Where appropriate, corrective actions will be taken, and measures will be implemented to prevent future misconduct.

5. Good Faith Reporting: Whistleblowers are expected to raise concerns in good faith, based on a genuine belief that the information provided is true and accurate. Reports made maliciously, knowingly false, or with the intent to harm others may result in disciplinary action.

6. No Retaliation for Good-Faith Reports: Any employee found to have retaliated against a whistleblower will be subject to disciplinary action, which may include termination of employment. HF Recycle Limited will not tolerate any form of retaliation against individuals who report concerns in good faith.

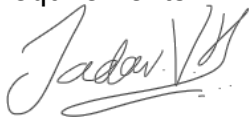
7. Anonymous Reporting: Anonymous reporting is allowed, and appropriate measures will be taken to protect the confidentiality of anonymous whistleblowers. However, providing contact information may aid in conducting a thorough investigation or seeking further clarification.

8. Awareness and Training: We will provide regular training and awareness programs to educate employees about their rights and responsibilities under this Whistleblowing Policy. This will include information on the reporting process, protections, and the importance of whistleblowing in maintaining ethical standards.

Responsibility:

The responsibility for implementing and maintaining this Whistleblowing Policy rests with the management team of HF Recycle Limited. All employees, including managers and supervisors, are expected to support and adhere to the principles outlined in this policy.

By signing below, I acknowledge that I have read and understood the HF Recycle Limited Whistleblowing Policy and agree to comply with its principles and requirements.

A handwritten signature in black ink, appearing to read 'Jadav VJ', with a horizontal line underneath.

Mr. Vrushabh Jadav

Recycling Plant General Manager, HF Recycle Limited.

Date: 01/10/2021