

ARTEMIS GLOBAL LIFE SCIENCES LIMITED

VIGIL MECHANISM AND WHISTLE-BLOWER POLICY

Content

1. Introduction
2. Scope & Exclusion
3. Terms and Definitions
4. Policy

1. Introduction

Artemis Global Life Sciences Limited (“the Company”) and is committed to conducting business with integrity, including in accordance with all applicable laws and regulations. The Company expectations with respect to business ethics are contained in the Code of Business Conduct and Ethics (the “**Code of Conduct**”).

Employees are required to report actual or suspected violations of applicable laws and regulations and the Code of Conduct, and the Company has an obligation to ensure that there is a procedure in place to enable the reporting of such violations.

2. Scope and Exclusions

The Vigil Mechanism and Whistle-blower Policy (“the Policy”) sets out the procedure to be followed when making a disclosure.

This Policy applies to all Employees, regardless of their location. Violations will result in appropriate disciplinary action. The employees are required to familiarize themselves with this Policy, and seek advice from the CFO of the Company, if any, questions arise.

3. Terms and Definitions

“**Audit Committee**” means the committee constituted by the Board of Directors of Artemis Global Life Sciences Limited in accordance with Section 177 of the Companies Act, 2013, which has responsibility for supervising the development and implementation of this Policy.

“**Code of Conduct**” means the Code of Business Conduct and Ethics.

“**Employee**” means any employee or director of the Company.

“**Reportable Matter**” means a genuine concern concerning actual or suspected:

1. fraudulent practices, such as improperly tampering with the Company books and records, or theft of the company property;
2. corruption, including bribery and money laundering;
3. breaches of the Code of Conduct.

Please note that complaints concerning personal grievances, such as professional development issues or Employee compensation, are not Reportable Matters for the purposes of this Policy.

“Whistle-blower” means any Employee who makes a Protected Disclosure under this Policy.

4. Policy

4.1 Responsibility to Report

Protected Disclosures are to be made whenever an employee becomes aware of a Reportable Matter. The Protected Disclosure should be made promptly upon the Employee becoming aware of the Reportable Matter. Reportable Matters should be made pursuant to the reporting mechanism described in Section 4.2 below.

The role of a Whistle-blower is limited to making a Protective Disclosure. A Whistle-Blower should not engage in investigations concerning a Reportable Matter that is the subject of a Protected Disclosure. Neither should a Whistle-blower become involved in determining the appropriate corrective action that might follow from the submission of a Protected Disclosure.

4.2 Reporting Mechanism:

The Audit Committee has established a Compliance Mechanism to process and investigate Protection Disclosures and it shall be responsible for supervising of Compliance Mechanism. Protected Disclosures are to be made to the Compliance Mechanism as under:

- a. By email to cfo@agls.in
- b. By letter addressed to the Audit Committee, marked “Private and Confidential”, and delivered to the Chairman of the Audit Committee, Artemis Global Life Sciences Limited, SF-202, The Peach Tree, Block-C, Sushant Lok-I, Gurgaon-122002.

Protection of Whistle-Blowers:

If a Whistle-blower does provide his or her name when making a Protected Disclosure, the Company will treat as confidential the identity of the Whistle-blower and the fact that a Protected Disclosure has been made, except as otherwise required by law and to extent possible allowing an investigation to proceed.

A Whistle-blower may make a Protected Disclosure without fear of retaliation or intimidation. The Company prohibits its Employees from engaging in retaliation or intimidation that is directed against a Whistle-blower. Employees who engage in retaliation or intimidation in violation of this Policy will be subject to disciplinary action, which may include dismissal from employment.

If a Whistle-blower has been found to have made a deliberately false Protected Disclosure that Whistle-blower may be subject to disciplinary action, which may include dismissal.

Role of Audit Committee:

The Audit Committee is responsible for supervising the development and implementation of this Policy, including the work of the Compliance Mechanism. The Audit Committee shall periodically review the Policy to consider whether amendments are necessary, and, if so, it shall communicate any such amendments to all Employees as soon as possible.

The Audit Committee shall receive reports from Compliance Mechanism concerning the investigation and resolution of Protection Disclosures made pursuant to the Policy on a quarterly basis as per the guidelines given by the Audit Committee.

Questions:

If you have any questions concerning this Policy or the Code of Conduct, please Contact:

Address: Company Secretary, Artemis Global Life Sciences Limited SF-202, The Peach Tree, Block-C, Sushant Lok-I, Gurgaon-122002.

Email id: cfo@aglsl.in