

WHISTLE BLOWER POLICY

This Vigil Mechanism/Whistle Blower Policy has been created pursuant to provisions of Section 177 of the Companies Act, 2013.

As a conscious and vigilant organization, Capri Hospitality, believes in conducting business in a fair and transparent manner by adopting high standards of professionalism, honesty, integrity and ethical behaviour. It expects all associates to maintain the same standards in everything they do. Associates are therefore encouraged to report any wrong doing within the company/branches/hotels that falls short of these business principles on ethics and good business practices.

The businesses where the Management is outsourced shall implement its own Whistle Blower Policy and shall inform the Head of HR of the Company, who is also a Member of the Committee, of any complaints received including leak of Unpublished Price Sensitive Information. The Head of HR would in turn take up the matter with the relevant stakeholders. Additionally, the coordinates where the Members of the Committee can be reached should be appropriately communicated from time to time.

For the other businesses the Company has introduced the Whistle Blower Policy, as below. (Capri Hospitality(Company) to be construed as including its Corporate Office , Commercial establishments, Branch Offices / projects at various locations (Units))

In its endeavour to provide its associates a secure and a fearless working environment, the Company has established this "Vigil Mechanism/Whistle Blower Policy". It has been created with the objective of providing associates a secured framework to raise genuine concerns which seem to go against the company's commitment to the highest possible standards of ethical, moral and legal business conduct and is part of its commitment to open communication.

Associates are encouraged to use the procedure set out below if they have any concerns at all about any wrongdoing at work.

This policy/framework is applicable to and can be used by all directors and associates of the Company across levels and brands. The concerns may be relating to:

1. Abuse of authority
2. Manipulation of Company Data / records
3. Financial irregularities, fraud or suspected fraud
4. Pilferage of confidential Company information.
5. Wastage / misappropriation / theft of Company funds / assets
6. Deliberate violation of law / regulation
7. Negligence causing danger to individual / public health and safety
8. Breach of contract
9. Criminal offence
10. Damage to the environment.
11. Unethical work behaviour/ practices
12. Corruption, including bribery and money laundering
13. Breach of the Code of Internal Procedures and Conduct for Regulating, Monitoring and

Reporting Trading by Designated Persons including any leak of Unpublished Price Sensitive Information which could result in tarnishing the image of the organization, its services, its social image, employee morale and employee's safety at the workplace.

At no point associates should use this platform as a route for taking up personal grievances against someone. Whistle Blowers, who make disclosures, which when subsequently are found to be mala fide, frivolous, malicious or baseless shall be liable for appropriate disciplinary action.

The main object of this Policy is to provide for adequate safeguards against victimisation of persons who use this mechanism and to make provision to allow direct access to the Audit Committee in appropriate or exceptional cases.

Associates can be assured that if they do come forward with any concern, everything possible will be done to respect their confidentiality. If we discover that any other associate had tried to discourage another associate from coming forward or had victimized that associate, this would be treated as a serious disciplinary offence.

This policy and process document defines the scope of actions and activities which are covered by the policy and its purpose.

The Whistle Blower Committee of the Company shall comprise of:

Name	Designation	Email Address
Mr. Sajan Panicker	Managing Director & Chairman	whistleblower@caprihospitality.com
Ms. Neethu	VP – Human Resources	
Ms. Pooja Sharma	Mgr- Human Resources & Coordinating Member for the Committee	

The Audit Committee of the Company shall oversee the implementation of the Whistle Blower Policy.

Any complaints referred to the Whistle Blower Committee together with the results of investigations, shall be reported to the Audit Committee on a quarterly basis.

The Company's Units shall promptly inform the Committee on matters reported. Any associate should file his complaint to the Committee through the designated email ID, disclosing details and evidence of the matter to the extent possible.

The Whistle Blower must put his/her name on the disclosure. Concerns expressed anonymously will not be usually investigated but subject to the seriousness of the issue raised, the designated authority can initiate an investigation independently. Everything possible will be done to respect confidentiality of the Whistle Blower.

Investigation will be carried out in a fair manner and without presumption of guilt.

All complaints reported under this Policy will be thoroughly investigated and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action.

Feedback with regard to outcome of the investigation will be given to the complainant within 7 working days of completion of the investigation. The exact nature of any disciplinary action taken against any person will remain confidential.

Whether there was a case to answer or not, and provided that the disclosure was made in good faith with reasonable belief, the company will ensure that the complainant is protected from reprisal or victimization as a result of the complaint. Only where it is established that the allegations were false and made maliciously will disciplinary action be taken against the associate.

A Whistle Blower Policy cannot be effective unless it is properly communicated to associates. All associates shall be informed by publishing the policy on the notice board and the website of the Company and its Units.

This policy will remain current until withdrawn and communicated.

The Board of Directors of the Company have accorded their approval to this policy at their meeting held on 01, January 2023.