

VIGIL MECHANISM/WHISTLE BLOWER POLICY

The Company believes in the conduct of its affairs in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity, and ethical behavior.

OBJECTIVE

- Adequate safeguards against victimization,
- Confidentiality of the identity of the whistleblower,
- Proper mechanism for investigation and resolution.

- Malpractices, impropriety, fraud, corruption, financial irregularities
- Violation of legal or regulatory provisions
- Misuse of authority
- Breach of Company's Code of Conduct/Ethics Policy

1. “Company” means Pride Hotels Limited
2. “Whistle blower” means a person (employee/director) making a protected disclosure.
3. “Protected Disclosure” means a complaint, concern, or information reported under this Policy.

4. “Audit Committee” means the committee of the Board of Directors of Pride Hotels Limited constituted as per applicable laws.

5. “Subject” means a person against whom a disclosure has been made.

GUIDING PRINCIPLES

- Whistleblowers will be protected against any unfair treatment or victimization.
- Complaints should be made in good faith.
- Confidentiality of the whistleblower shall be maintained.
- False or malicious complaints will result in disciplinary action.

MECHANISM FOR REPORTING

The whistle Blower can report in any mode to the Chairperson of the Audit Committee or in case of absence of Chairperson, Member of the Audit Committee.

INVESTIGATION PROCESS

- The Audit Committee will review and investigate the complaint.
- A preliminary review will determine if the matter requires detailed investigation.
- Findings and recommendations will be submitted to the Board or appropriate authority.
- Appropriate disciplinary or corrective action will be taken, if required.

DECISION

If an investigation, including a preliminary report if any, leads the Audit Committee to conclude that an improper or unethical act has been committed, the Audit Committee shall direct the management of the Company to take such disciplinary or corrective action against the delinquent as it may deem fit.

PROTECTION OF WHISTLEBLOWER

- No unfair treatment, discrimination, harassment, or victimization will be meted out to a whistle blower.
- Retaliation against whistle blowers will invite strict disciplinary action.

Head Off.: “The Ruby”, 5th Floor, Office No.5 SC, South Wing on Level 8th Senapati Bapat Marg, Mumbai – 400 028 India.
 • CIN No. U55200DL1983PLC219781 • Toll free : 1800 209 1400 • Tel.: +91-22-4037 2424 / 4037 2415 • E-mail : headoffice@pridehotel.com
 Regd. Off.: Pride Plaza Hotel, Asset 5A, Hospitality District, Delhi Aerocity, IGI Airport, New Delhi - 110037 Tel.: +91 11 7160 0700. • Website : www.pridehotel.com



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FALSE ALLEGATIONS

- Whistle blowers must ensure that complaints are made in good faith.
- Deliberately false or malicious complaints will result in disciplinary action.

CONTACT DETAILS FOR WHISTLE BLOWER COMPLAINTS

The whistle blower shall raise complaint of such incidents with the Company Secretary and Compliance officer of the Company the details are as follows:

Designation of the officer: Company Secretary and Compliance officer

Email ID: cs@pridehotel.com

Tel No.: +912240372404

AMENDMENT

Company reserves its right to amend or modify this Vigil mechanism in whole or in part, from time to time, with the approval of the Board of Directors of the Company.

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