

Veena World – Vigil Mechanism / Whistle Blower Policy

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| Policy Version | 1.0 |
| Date of Approval | May 15, 2025 |
| Effective Date | July 7, 2025 |
| Approved by | Board of Directors |
| Applies to | All Employees and Directors of Veena Patil Hospitality Pvt. Ltd. and its Group Entities |

1. Objective

To provide a secure, confidential, and accessible mechanism for directors and employees to report genuine concerns about unethical behavior, actual or suspected fraud, violation of policies, or any act detrimental to the company's interest.

2. Scope

This policy is applicable to:

- All directors, employees (permanent/contractual/temporary), interns, and associates.
- Concerns involving any department or activity of the organization.
- Reports made in good faith, with or without supporting evidence.

3. Definitions

- **Whistle Blower:** A person who reports a concern under this policy.
- **Protected Disclosure:** A concern raised with reasonable belief and good faith regarding unethical conduct, fraud, or non-compliance.
- **Vigilance Officer:** Mr. Neil Patil, Director – appointed to administer this policy.
- **Investigator(s):** Person(s) appointed by the Vigilance Officer to conduct inquiries.
- **Frivolous Complaint:** A deliberately false or malicious complaint not backed by reasonable belief or evidence.

4. Coverage of the Policy

Includes (but is not limited to):

- Misuse of authority or resources
- Financial irregularities or accounting fraud
- Violation of company policies
- Insider trading or confidential information leaks
- Acts of bribery, corruption, or unethical conduct
- Endangerment of employee/public safety or environment

Note: Personal grievances such as salary disputes or interpersonal issues not involving wrongdoing are not covered unless they indicate policy violations.

5. Procedure for Disclosure

Modes of Reporting:

- a) Written letter (sealed envelope)
- b) Email: neil@veenaworld.com
- c) In-person meeting (by appointment)
- **Address:**
Mr. Neil Patil
Vigilance Officer – Veena World
701, Neelkanth Corporate Park, Kiroli Road, Vidyavihar (West), Mumbai – 400086
- **Subject Line: “Protected Disclosure – Vigil Mechanism”**
- Anonymous disclosures are permitted, but identity helps better investigation. All disclosures will be treated with confidentiality.

6. Investigation & Resolution

- The Vigilance Officer may:
 - Request more information from the whistle blower.
 - Appoint internal or external Investigators.
 - Ensure that the alleged party is given fair opportunity to respond.
- A report will be submitted to the Board post-investigation.
- Actions may include disciplinary measures, corrective procedures, or legal escalation.

7. Protection to Whistle Blower

- No adverse action will be taken against a person reporting in good faith.
- Retaliation, victimization, or harassment of the whistle blower will result in strict disciplinary action.

8. Governance & Review

- The Board shall periodically review the policy and implementation.
- Any amendments must be approved by the Board.

For and on behalf of the Board of Directors

Veena Patil Hospitality Private Limited

Sd/-

Authorised Signatory

Date: July 7, 2025