

Chalet Hotels Limited

(Formerly known as Chalet Hotels Private Limited)

CIN:- U55101MH1986PLC038538

Raheja Tower, Plot No. C-30, Block 'G', Next to Bank of Baroda, Bandra Kurla Complex, Bandra (E),
Mumbai 400051: Tel:- 91-22-26564000

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, Chalet Hotels Limited (Company), believes in conducting business in a fair and transparent manner by adopting high standards of professionalism, honesty, integrity and ethical behavior. It expects all Employees to maintain the same standards in everything they do. Employees 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 Company's Hotels viz. J. W. Marriott Sahar, Renaissance Mumbai Hotel & Convention Centre shall inform the Committee on matters reported on the Business Integrity Line including, but not limited to, leak/suspect a leak of Unpublished Price Sensitive Information.

The Westin Hyderabad Mindspace shall inform the Committee on matters relating to leak or suspect a leak of Unpublished Price Sensitive Information and reported under the Non-Retaliation Policy for Associates who Report Violations

(Chalet Hotels Limited (Company) to be construed as including its Hotels and Branch Offices / projects at various locations)

In its endeavor to provide its employees 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 employees 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.

Employees 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 employees 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

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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 behavior/ 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

which could result in tarnishing the image of the organization, its services, its social image, employee morale and employee's safety at the workplace.

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.

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 | Contact Numbers | Email Address |
|---------------------------|----------------------------------|--------------------------------|---|
| Mr. Sanjay Sethi | Managing Director & CEO | 022-26564241 / 022-26564242 | sanjay@chalet-hotels.com |
| Mr. Rajeev Newar | Executive Director & CFO | 022-26564283 | Rajeev.newar@chalet-hotels.com |
| Ms. Christabelle Baptista | DGM-Legal & Company Secretary | 022-26565496 / 9833732154 | Christabelle.baptista@chalet-hotels.com |

The Audit Committee of the Company shall oversee the implementation of the Whistle Blower Policy. Complaints referred to the Whistle Blower Committee together with the results of investigations, if any, shall be reported to the Audit Committee/Chairman of the Audit Committee on a QUARTERLY basis. The Committee shall, in turn, call for and scrutinize/investigate reports from the respective Hotels.

The Company's Hotels viz. J. W. Marriott Sahar, Renaissance Mumbai Hotel & Convention Centre and Marriott Executive Apartments, The Westin Mindspace

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Hyderabad and The Bengaluru Marriott shall inform the Committee on matters reported on the Business Integrity Line.

Four Points By Sheraton shall inform the Committee integrity matters and violations reported/brought to the attention of the Hotel's Management.

An Employee/director may write to any member of the Committee or send an email, disclosing details and evidence of the matter to the extent possible.

Any grievance or complaint against any Member of the Committee should be addressed to the Audit Committee.

As the Whistle Blower has different available means of reporting, he/she need never report to someone whom he/she believes may be involved in the suspected violation or from whom he/she would fear retaliation.

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.

A whistle Blower policy cannot be effective unless it is properly communicated to employees. Employees shall be informed by publishing the policy on the notice board and the website of the Company and its Units/Hotels/Branch Offices.

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 February 26, 2015.

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Amended on: June 12, 2018; November, 13, 2018;