

## **Vigil Mechanism and Whistleblower Policy**

For K Raheja Corp Real Estate Pvt. Ltd.

## Vigil Mechanism and Whistleblower Policy

### Overview

<b>Approving Authority</b>	Board of Directors of K Raheja Corp Real Estate Private Limited (Formerly known as Feat Properties Private Limited)
<b>Approval Date</b>	11 April 2025
<b>Effective Date</b>	This Policy on Vigil Mechanism and Whistleblower ("Vigil Mechanism and Whistleblower Policy" or "Policy") shall come into effect from the date it was adopted by the Board of Directors at their Board Meeting held on 11 April 2025.

### Purpose

K Raheja Corp Real Estate Private Limited (KRCREPL) ("The Entity") has adopted the Vigil Mechanism and Whistleblower Policy ("Policy") with the aim to provide an internal mechanism to be notified of concerns about malpractices at workplace.

### Scope

This Policy has been approved and adopted by the Board of Directors and is applicable to the Entity. This Policy is applicable to all employees of K Raheja Corp Real Estate Private Limited (KRCREPL) across all locations.

### Definitions

**"Applicable Law"** means any statute, law, regulation, ordinance, rule, judgement, order, decree, by-law, approval of any Governmental Agency, directive, guideline, policy, requirement or other government restriction or any similar form of decision of or determination by, or any interpretation having the force of law of any of the foregoing Governmental Agency having jurisdiction, applicable to any Party, in force from time to time, including but not limited to the Residential Real Estate regulations.

**"Board of Directors"** shall mean the Board of Directors of the K Raheja Corp Real Estate Private Limited.

**"Employee"** shall include Regular Employees and Consultants at the Registered Office as well as the Branch Offices/Projects/Site Offices, Contractors, Retainers, Agency staff etc.

**"Entity"** shall mean K Raheja Corp Real Estate Private Limited.

**"Whistleblowing"** shall mean a disclosure of information relating to any of the issues stated in 'Policy Coverage', (irrespective of whether the matter complained of is ongoing, past incident or is likely to happen in the future).

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### **1. Introduction**

As a conscious and vigilant organization, the Entity believes in conducting its business in a fair and transparent manner by adopting the highest 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 wrongdoing within the Entity that falls short of these business principles.

In its endeavor to provide its Employees a secure and a fearless working environment, the Entity has established the 'Vigil Mechanism and Whistleblower Policy'. This policy has been created with the objective of providing Employees to raise concerns which seem to go against the commitment of the Entity to the highest possible standards of ethical, moral, and legal business conduct and 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.

## **2. Policy Coverage**

This Policy is applicable to and can be used by all members of the Board of Directors and Employees of the Entity for disclosure of information relating to any of the following (irrespective of whether the matter complained of is ongoing, past incident or is likely to happen in the future):

- ✓ Abuse of authority
- ✓ Manipulation of official data / records
- ✓ Financial irregularities, including fraud or suspected fraud
- ✓ Pilferage of confidential information
- ✓ Wastage / misappropriation of funds / assets
- ✓ Deliberate violation of law / regulation
- ✓ Negligence causing danger to individual / public health and safety
- ✓ Breach of contract
- ✓ Criminal offence
- ✓ Damage to the environment
- ✓ Unethical work behavior/ practices
- ✓ Corruption, including bribery and money laundering
- ✓ 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 may have the potential to adversely affect the image of the Entity, its services, its social image, employee morale and employee's safety at the workplace, regarded illegal, immoral, against national interest.

### 3. Disqualification

At no point Employees should use this platform as a route for taking up personal grievances against someone.

Whistleblowers, who make disclosures, which when subsequently are found to be *mala fide*, *frivolous*, *malicious*, or *baseless* shall be liable for appropriate disciplinary action.

### 4. Policy Coverage

Conduct falling within the area of a disclosure is taken very seriously by the Entity. The Entity's expectation is that there will never be an occasion when any of its employees would experience such an incident.

However, if anyone is aware of any conduct falling within that identified in the qualifying disclosure, we would urge them to come forward as soon as possible. However minor, it is best that problems are brought to the attention of the Entity as early as possible so that they can be addressed before becoming too serious.

Whistleblowers can raise their concerns in writing to any of the following designated authorities:

- a. Mr. Sudhir Singhvi, Chief Financial Officer (CFO), Residential Real Estate
- b. Ms. Urvi Aradhya, Chief Human Resources Officer (CHRO)
- c. Ms. Nikita Parikh, Assistant General Manager - Asset Management

Any Employee/member of the Board of Directors of the Entity can also file his/her complaint to the Committee through the designated E-mail ID: [compliancekrcrepl@kraheja.com](mailto:compliancekrcrepl@kraheja.com), disclosing details and evidence of the matter to the extent possible.

Whistleblower 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. The Chairman of the Audit Committee will have direct access to the whistleblower complaints raised through the designated E-mail ID.

Employees 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 Employee had tried to discourage another Employee from coming forward or had victimized that Employee, this would be treated as a serious disciplinary offence.

### 5. Investigation & Reporting

- i. The investigation will be carried out in a fair manner, as a neutral fact-finding process and without presumption of guilt.

- ii. If there is a case to answer, and if appropriate, disciplinary action will be taken against the person/s who are the subject to the allegation/s.
- iii. You will be given feedback with regard to outcome of the investigation within fifteen working days of completion of the investigation. The exact nature of any disciplinary action taken against any person will remain confidential.
- iv. Whether there was a case to answer or not, and provided that your disclosure was made in good faith because you reasonably believed it to be true, the company will ensure that you are protected from reprisal or victimization as a result of your complaint.
- v. Only where it is established that your allegations were false and made maliciously will disciplinary action be taken against the Employees. Such disclosures will be treated as gross misconduct and the Employee shall be liable for appropriate disciplinary action.
- vi. The Audit Committee of the Entity shall oversee the implementation of the Policy.
- vii. Any complaints referred to the Whistleblower Committee together with the results of investigations, shall be reported to the Audit Committee on a quarterly basis

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#### **Management and Review**

This Policy shall be reviewed periodically for its suitability and updated when necessary.

#### **Amendment**

This Policy shall stand amended to the extent of any change in Applicable Law, including any amendment to the Residential Real Estate regulations, without any action from the Entity. The Board of Directors of the Entity reserves the right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.