

## Asian Hotels (East) Limited

### Whistle Blower Mechanism / Vigil Policy & Mechanism

#### Preamble

As per Section 177 of the Companies Act, 2013 read with the Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014 and Regulations 4(2)(d)(iv) & 22 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ['Listing Regulations'] (effective from 1<sup>st</sup> December 2015), every listed company shall establish a vigil mechanism for its directors and employees to report genuine concerns. The listed entity shall also devise an effective whistle blower mechanism enabling stakeholders including individual employees and their representative bodies to freely communicate their concerns about illegal or unethical practices. This new whistle blower mechanism/vigil policy & mechanism was adopted by the Board of Directors of the Company on 30<sup>th</sup> October, 2015 based on the recommendation of the Audit Committee in substitution of the existing policy.

#### Policy

In compliance with the above requirements, Asian Hotels (East) Limited, being a listed Company has established a whistle blower mechanism /vigil mechanism and formulated a policy in order to provide a framework for responsible and secure whistle blowing/vigil mechanism which shall be governed by the above legal provisions.

#### Policy Objectives

In terms of aforesaid legal provisions, the whistle blower mechanism /vigil mechanism provides for adequate safeguards against victimization of director(s) or employee(s) or any stakeholders to avail of the mechanism and also provide for direct access to the Chairman of the Audit Committee in exceptional cases.

#### Eligibility and Procedure

1. All directors, employees and stakeholders of the Company are eligible to make complaint under the policy in relation to illegal or unethical practices concerning the Company.
2. In case any victimization occurs then the same should be reported to the following persons for investigation:

i). Mr. A. C. Chakrabortti  
Chairman of the Audit Committee  
Email- whistleblowerchac@ahleast.com

ii) Mr. Saumen Chattopadhyay  
Chief Legal Officer & Company Secretary  
Asian Hotels (East) Limited  
Hyatt Regency Kolkata  
JA-1, Sector-III, Salt Lake City  
Kolkata – 700 098  
E-mail – saumen.chatterjee@ahleast.com

#### Investigation

1. All compliant received under this policy will be recorded and thoroughly investigated. The Chairman of Audit Committee may investigate and may at his discretion consider directing any other officer of the Company for the purpose of investigation.
2. The investigation shall be completed normally within 90 days of the receipt of the compliant and is extendable by such period as the Chairman of Audit Committee deems fit.

#### Decision and Reporting

If an investigation leads to a conclusion that an illegal or unethical practices has been committed, the Chairman of the Audit Committee shall place the matter before the Audit Committee for onward recommendation to the Board of Directors of the Company to take such disciplinary or corrective action as it may deem fit and the decision of the Board shall be final.



**Disclosures**

This policy shall be disclosed in the Company's website.

**Review and Amendment**

The Board may, subject to applicable Listing Regulations review and amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy, based on the recommendations of the Audit Committee.

