

Vigil Mechanism/Whistle Blower Policy

Introduction

Vigil Mechanism/Whistle Blower Policy is framed in pursuance to the provisions of Section 177 (9) of the Companies Act, 2013 read with Rules made thereunder, Regulation 4 (2) (d) and Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 and Regulation 9A (6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.

Vigil Mechanism/Whistle Blower Policy:

The Vigil Mechanism/Whistle Blower Policy is framed for Directors, Stakeholders, Individual Employees and their representative bodies to report and communicate his/her/their genuine concerns, illegal or unethical practices.

Procedure

Any Director, Stakeholder or Individual Employee or representative bodies of employees, may report/communicate to Mr. Inderjeet Singh Wadhwa, Managing Director:-

- a) his/her/ their genuine concerns, illegal or unethical practice and
- b) instances of leak of Unpublished Price Sensitive Information.**

1. In case of appropriate or exceptional cases or if the complaint relates to the Key Managerial Personnel, Non-Independent Directors, the person complaining may report to or communicate with Mr. **Sunil Kumar Mehdiratta**, Chairman of the Audit Committee.
2. The Contact details of Mr. Inderjeet Singh Wadhwa, Managing Director and Sunil Kumar Mehdiratta, Chairman of the Audit Committee are given below:

Mr. Inderjeet Singh Wadhwa

Managing Director,

B-18, Sector-5, Noida-201301, U.P.

Email: indee@seasonsworld.com

Mr. Sunil Kumar Mehdiratta,

Chairman-Audit Committee,

B-18, Sector-5, Noida-201301, U.P.

3. The Managing Director or the Chairman of the Audit Committee, as the case may be, on receipt of the complaint shall have the matter investigated in a fair and unbiased manner.
4. The management will order appropriate action on the basis of findings as a result of the investigation.

Protection

- a) No victimization including (discrimination, harassment and unfair treatment) will be meted out to any Director, Stakeholder, Individual Employee and their Representative Bodies, who avail the mechanism provided under the Vigil Mechanism/Whistle Blower Policy.

- b) Identity of the persons reporting the concern shall be kept confidential to the extent possible and permitted under law. The employees or other persons are cautioned that their identity may have to be disclosed under any law or during the investigation.

- c) While Policy provides adequate safeguard to the genuine persons availing the Vigil Mechanism/Whistle Blower Policy, the persons are advised to refrain from reporting any frivolous complaints. The management is free to take suitable actions including reprimand against such persons.