
WHISTLE BLOWER POLICY

Whistle Blower Policy

Purpose

The purpose of this policy is to lay down guidelines for team members to report any concerns, grievances, unethical behavior, actual or suspected fraud or violations of company's code of conduct to the concerned authority / committee.

Scope

Antara Senior Living Limited and its group companies (Antara) desire to continue its endeavor to maintain the highest standards of professionalism, integrity and ethical behavior in the conduct of its team members.

This policy is applicable to all team members of Antara, in any type of employment.

Policy Guidelines

- Team members must raise concerns (Annexure 1 – types of concerns) only with a member of the Whistleblower Committee, in writing, stating the facts, circumstances etc. The concerns can also be raised to the Audit Committee of Antara in exceptional cases.
- Team members may specifically request for anonymity, in which case, the identity of the team member will be kept confidential. In any other case, the identity of the team member shall be revealed only to the extent required for investigations and shall remain confidential with the member of Whistleblower Committee.
- An e-mail acknowledging the receipt of the concern will be sent to the team member.
- The Whistleblower Committee shall evaluate whether or not an anonymous concern should be investigated in accordance with this Policy.
- All investigations shall be carried out by/or under the instructions of the Whistleblower Committee.
- A team member who raises a concern can neither be a member of the Whistleblower Committee, nor shall he/she be allowed to participate in any investigation unless specifically called upon by the Whistleblower Committee.

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- Team members are expected to raise any concern in good faith only, if there are justifiable and reasonable reasons for communication of any wrongful conduct, or unethical and/or improper practices.

Role and Responsibility of the Whistleblower Committee

- The Whistleblower committee shall be the sole contact point for all team members with respect of this policy, and, shall receive all concerns from team members of Antara.
- The committee shall evaluate whether or not a concern, including any concerns received anonymously, should be investigated further.
- The committee shall be entitled to request for any and all documentation and/or information in respect of a reported concern from the team member.
- The committee shall be responsible for closure of all concerns.
- The committee shall conduct and/or cause that all Investigations are conducted in a fair and judicious manner.
- The committee shall be empowered to frame internal policies and/or regulations from time to time, for the conduct of all Investigations.
- The committee shall make detailed written report in respect of each Concern

Whistle Blower Committee Members

The Whistle Blower committee member at Antara would comprise of the following:

Name	E-mail Id	Phone Number
Sanjay Bhatia	sanjay.bhatia@antaraseniorliving.com	9810002432

Annexure 1 – Types of Concerns

Team member may raise concerns relating to violation of any of the following, including policies, regulations, laws, ethical standards of Antara in connection with but not limited to:

Accounting and Auditing Matters - including unethical recording of business and financial transactions. (Examples include and are not limited to misstatement of revenues, expenses, misapplication of accounting standards)

Conflict of Interest - a conflict of interest is a situation in which team member has a personal interest, which may influence his or her official duties. (Examples include and are not limited to: hiring of relatives without proper disclosures, approving a vendor who is related, benefiting from business information for his or her own account/benefit)

Embezzlement - to misappropriate property entrusted to one's care for one's own use. (Examples include and are not limited to: inflation or falsification of bills, misappropriation of customer funds such as premium payments)

Falsification of Contracts, Reports or Records - falsification of records consists of altering, fabricating, falsifying, or forging all or any part of a document, contract or record for the purpose of gaining an advantage, or misrepresenting the value of the document, contract or record.

Securities Violations - an infringement of the personal trading guidelines or indulging in insider trading, through the use of material non-public information for one's personal benefit, or of a friend or any third party.

Theft - The act of stealing of data or of property/funds belonging to Antara.

Violation of Antara Policies - Willful or innocent actions that are in direct violation of Antara policy, procedures, processes, Code of Conduct, and/or implied contractual responsibilities. (Examples include and are not limited to: violation of anti-corruption Policy, gift, meals and entertainment Policy, etc.)

Violation of law / regulations – include willful or innocent violation of provisions of various laws applicable to Antara.

Workplace Misconduct – including matters related to behavior of team members at the workplace, harassment unfair treatment of team members etc.

Miscellaneous - abuse of authority; breach of contract; negligence causing substantial and specific danger to public health and safety; manipulation of Antara's data/records; financial irregularities, including fraud, or suspected fraud; criminal offence; pilferage of confidential/propriety information; wastage/misappropriation of Antara's funds/assets; breach of team member's code of conduct or rules or policies; any other unethical, biased, favored, imprudent event.

Others – shall include categories of concerns which do not fall under the categories above but may make the team members suspect a breach of law or ethical principles or of any non-compliant activity.