Hotel Rugby Limited
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WHISTLE BLOWER POLICY

Hotel Rugby Limited believes in the conduct of the affairs of its constituents in a fair and transparent manner by adoption of highest standards of professionalism, honesty, integrity and ethical behavior. The company supports and encourages its Directors/Committee Members and Employees to come forward and report to the Management / Chairperson of the Audit Committee instances of unethical behaviour, actual or potential fraud or violation of the Company's Code of Conduct or Ethics policy which would be a matter of serious concern.

The Board of Directors had noted the provisions of Section 177 of the Companies Act, 2013 read with Rule 7 of the Companies (Meetings of the Board and its Powers) Rules, 2014 & Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and accordingly, approved the revised whistle blower policy for the Company which provides for a vigil mechanism to report genuine concern or grievances of Directors/Employees to ensure proper governance. Further, Whistle Blower Policy helps in bringing the attention of the Management/ Chairperson of the Audit Committee in respect of unethical behavior, actual or potential fraud or any irregularities in the Company practices in proper manner.

The said policy, however, provides for adequate safeguards to the victim who avail this mechanism. The policy also provides for direct access to the Chairperson of the Audit Committee in exceptional cases. The assurance and co-operation from the Management is also extended in safeguarding the interest of the individuals who chooses to report matters to the Management. In the process, it is also to be ensured that the Policy is not misused. Whistle Blower Policy aims that Employees and Directors shall act as Guardian of Company's core values. It is to be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment including any harassment and any abuse will warrant disciplinary action.

The revised Whistle Blower Policy has been duly intimated to all the Directors/ Committee Members/ Employees of the Company.

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