KOPA

# Whistle Blower/ Vigil Mechanism Policy

## Eligibility:

All employees on the regular rolls and the Directors of the company.

## Guidelines and Policy Objectives:

"Whistle-blowing" means a disclosure of information relating to malpractices and events which have taken place / suspected to have taken place misuse or abuse of authority, fraud or suspected fraud, violation of Company code / rules/ policies, manipulation, negligence causing danger to public health and safety, misappropriation of monies, and other matters or activity on account of which the interest of the Company is affected.

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

However minor, it is best that problems are brought to the attention of the company as early as possible so that they can be addressed before becoming too serious.

## Whistle Blowers can raise their concerns in writing to any of the following designated authorities:

**Prajnya Shetty - Chief People Care and Development Officer –** pshetty@lakeshorein.com

**Daryush Marfatia – General Counsel –** dmarfatia@lakeshorein.com

**Deepak Jagwani – Group Compliance Officer –** djagwani@lakeshorein.com

For appropriate or exceptional cases requiring direct access to the Board level:

**Ashwin Puri and/ or Karim Merchant (Nominated Director(s)) –**
apuri@lakeshorein.com **and/ or** kmerchant@lakeshorein.com.

## Reporting and Investigation:

• Whistleblowers are expected to disclose their identity when making a report. Anonymous complaints will generally not be investigated; however, where the nature or seriousness of the allegation warrants, the designated authorities may, at its discretion, initiate an independent review.

• The Company will take all reasonable steps to maintain the confidentiality of the whistleblower's identity, subject to legal and regulatory requirements.

• Any attempt by an employee to discourage, retaliate against, or victimise a whistleblower will be treated as a serious disciplinary offence.

• All investigations will be conducted in a fair, objective, and impartial manner, as a neutral fact-finding process, without any presumption of guilt.

• The whistleblower will be informed, to the extent appropriate, of the outcome of the investigation within a reasonable period following its completion. The details of any disciplinary or corrective action taken will remain confidential.

• Where a disclosure is made in good faith, the Company will ensure that the whistleblower is protected from retaliation or victimisation, irrespective of whether the concern is ultimately substantiated.

• Where it is established that a complaint was made maliciously, or in the event of repeated frivolous complaints, the Nominated Director may take suitable action. Such conduct will be treated as serious misconduct and shall be subject to disciplinary action as per the Company's existing policies and/or applicable law.

• Where an investigation establishes that an improper or unethical act has occurred, the designated authorities / Nominated Director shall recommend appropriate disciplinary or corrective action to the Board of Directors. Such action shall be implemented in accordance with applicable Company policies and procedures.

• A consolidated summary of all disclosures (if any), investigations undertaken, and actions taken shall be placed before the Board of Directors at least annually, or more frequently as deemed necessary.

## Administration and amendments:

The Nominated Director manages this Policy and may amend it with Board approval. The Company can modify this Policy at any time, which becomes binding upon written notice to all Directors and employees. Any superseding laws or regulatory directives will automatically override conflicting provisions in this Policy.

Version dated: 12-May-2026