



WEWORK INDIA MANAGEMENT LIMITED
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Whistle Blower Policy

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LEGAL AND COMPLIANCE POLICIES

WHISTLE BLOWER POLICY FOR RAISING ALLEGATIONS OF MISCONDUCT AND VIOLATION OF THE CODE OF CONDUCT

STATEMENT OF POLICY

WeWork India Management Limited (“**WeWork**”) maintains an open working environment which includes a safe and easily accessible procedure for all WeWork Employees, independent contractors, Members (collectively “Employees/Third Parties”) to report actual or suspected misconduct, unethical or illegal practices by WeWork Employees at WeWork workplaces without fear of retaliation.

Section 177 (9) of the Companies Act, 2013 read with Rule 7 of the Companies (Meeting of Board and its Powers) Rules, 2014 mandates every listed company and certain companies to constitute a Vigil Mechanism/ Whistle Blower Mechanism. Further, Regulation 22 of SEBI (Listing Obligation and Disclosure Requirement) Regulations provides the following Vigil Mechanism guideline:

" The listed entity shall formulate a vigil mechanism whistle blower policy for directors and employees to report genuine concerns. The vigil mechanism shall provide for adequate safeguards against victimization of director(s) or employee(s) or any other person who avail the mechanism and also provide for direct access to the chairperson of the audit committee in appropriate or exceptional cases"

All WeWork, Employees/Third Parties are required to promptly report allegations of and/or any suspected: (i) misconduct; (ii) improper business practices inconsistent with legal, regulatory or fiduciary obligations; and (iii) violations of the WeWork Code of Conduct (the “**Code**”) and any WeWork’s policies (collectively “**Allegations of Misconduct**”).

Any actual or potential violations of WeWork’s policies or applicable laws, howsoever insignificant or perceived as such, would be a matter of serious concern. Accordingly, this Policy has been approved by the Committee of the Board of the Company as per the terms of the provisions of Section 177 of the Companies Act, 2013, Rule 7 of the Companies (Meetings of the Board and its Powers) Rules, 2014 and Regulation 4(2)(d)(iv) and Regulation 22 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI Listing Regulations**”).

All Employees/Third Parties may contact the respective WeWork supervisor, Department Head, the Head of People, the People Business Partner, Compliance SPOC or the General Counsel & Chief Governance and Compliance Officer, as the case may be, when reporting Allegations of Misconduct.

Employees/Third Parties can also raise concerns or report violations by contacting WeWork's Speak Up Ethics line administered by Integrity Matters, a third-party provider. Employees/Third Parties can also access Integrity Matter's separate website at <https://wework.integritymatters.in>

RATIONALE

WeWork is committed to conducting its business in accordance with the highest ethical standards as well as all applicable laws, rules and regulations. This Policy is intended to ensure that allegations and/or suspected acts of misconduct are investigated properly and promptly and to ensure that WeWork is conducting business in a lawful and ethical manner.

Raising questions and concerns helps create an ethical and socially responsible work environment. Speaking up also promotes a culture of free exchange where ideas are shared and deficiencies are quickly identified and addressed.

The main objective of this Policy is to:

- encourage Employees/Third Parties to come forward and report instances of misconduct, unethical and illegal practices;
- protect individuals that report actual or suspected misconduct, unethical or illegal practices in good faith, from any form of retribution, even if the report made proves to be unfounded; and
- ensure that all reports are investigated as promptly and thoroughly as possible and that appropriate corrective or disciplinary action is taken.

DEFINITIONS

1. ALLEGATIONS OF MISCONDUCT

An **Allegation of Misconduct** means conduct which, in the view of the reporting individual, acting in good faith, is:

- dishonest;
- fraudulent;
- corrupt;
- illegal;

- a violation of any law, rule or regulation which is applicable to the WeWork operations;
- unethical and/or constitutes a breach of the Code of Conduct or other WeWork policies; or
- conflicts of interest; or
- any other serious improper conduct.

2. GOOD FAITH

Acting in “**Good Faith**” means acting on a genuine belief when giving an honest, sincere and complete report. In other words, it does not matter whether the belief, that a breach may have occurred, was mistaken.

3. WHISTLEBLOWER

Whistleblower means any person who makes or attempts to make a report of an Allegation of Misconduct involving WeWork and/or a WeWork Employee.

DETAILED REPORTING PROCEDURE/GUIDANCE

A. REPORTING PROCEDURE

A Whistleblower may in the first instance report their concerns to the respective WeWork supervisor, Department Head, the Head of People, the People Business Partner, the Compliance SPOC or the General Counsel & Chief Governance and Compliance Officer, as the case may be. Local management/people business partners must notify the Compliance Captains/General Counsel of all matters not reported to legal or compliance.

If the Whistleblower is not comfortable raising his or her concerns or report violations or seek guidance with WeWork directly, they may do so through the following Ethics Line reporting channels:

#	Reporting Channel	Country	Contact Details	Availability
1	Phone	India	- Toll-Free: 1800-102-6969	24/7 English and Hindi 10:00 am – 7:00 pm IST Monday - Friday Tamil, Kannada,

				Telugu, Marathi and Gujarati Off-office hours: Voicemail facility available
		USA	Toll-Free: (+1) 888-436-0393	24/7 English
		Rest of the World	Toll Number: (+91) 9595-146-146	24/7 English
2	Web Portal	All countries	https://wework.integritymatters.in	24/7
3	Email	All countries	wework@integritymatters.in	24/7
4	Post	All countries	WeWork India Management Ltd., C/o Integrity Matters, Unit 1211, CENTRUM IT Park, Plot No C-3, S.G. Barve Road Wagle Estate, Thane West – 400604, Maharashtra, India	24/7

Important: *“Please mention access code WeWork in all your communication with Ethicsline”*

Ethicsline is operated by an independent external third-party specialist service provider “**Integrity Matters**”. Employees who contact Ethicsline will be assigned a unique report key that they may use to check on the status of reports and inquiries.

When using the Ethicsline, the Whistleblower will have a choice to remain anonymous. It is vitally important for the Whistleblower to keep his/her report number in a safe place so they can follow up on their concern or question. Report number, if lost, cannot be retrieved. WeWork may have follow-up questions about the concerns raised, and the Whistleblower can assist with the investigation by calling or logging back into the web reporting site to provide additional details.

WeWork requests that as much information as possible is provided. Without all the facts and complete information, it may be difficult for WeWork to get to the bottom of the concerns or questions raised and thereby, hamper WeWork’s ability to conduct a thorough and objective investigation.

Allegations of Misconduct will be evaluated as per the [WeWork Investigation Policy](#) to determine whether a formal investigation is warranted.

The Complainant shall have the right to access the Chairperson of the Audit Committee directly, via their E-mail ID chairman.auditcommittee@wework.co.in in appropriate or exceptional cases, and the Chairperson of the Audit Committee is authorized to prescribe suitable direction in this regard, as may be deemed fit.

CONFIDENTIALITY

A Whistleblower's identity shall be treated as confidential at all times unless disclosure is required by law or Whistleblower consents or where investigations so warrant.

All details regarding the Allegation of Misconduct including all investigation documents, files, reports and communications that are received or generated in connection with a report (formal or informal) shall be kept confidential and securely stored. WeWork may, however, report matters to the appropriate authorities as necessary.

NON-RETALIATION/WHISTLEBLOWER PROTECTION

WeWork prohibits retaliation against any Employee/Third Party for making a good faith report of actual or suspected violations of the Code, laws, regulations or other WeWork policies. WeWork condemns any kind of discrimination, harassment, victimization, retaliation or any other unfair employment practice being adopted against Whistleblowers.

WeWork will take all reasonable measures to ensure that a Whistleblower who reports an Allegation of Misconduct in Good Faith, and any person who participates in an investigation into an Allegation of Misconduct, will be protected from any form of retaliation or retribution by WeWork or an Employee, including but limited to:

- dismissal;
- demotion;
- any form of harassment;
- discrimination; or
- any current or future bias.

FALSE REPORTING

Intentionally making a false report or making a report other than in Good Faith will be considered misconduct, and may lead to disciplinary action, including termination of employment in serious cases.

While it will be ensured that genuine Whistleblowers are accorded complete protection from any kind of unfair treatment, any abuse of the mechanism under this Policy will warrant disciplinary action. Protection under this Policy would not mean protection from disciplinary action in accordance with the rules, procedures and policies of WeWork arising out of false or bogus allegations made by a Whistleblower knowing it to be false or bogus or with a mala fide intention. This will also apply to any employees, who make false statements or give false evidence during the investigations

COMMUNICATION

Directors and employees shall be informed of the Policy and contact details of the contact personnel by publishing on the notice board as soon as practicable from the date of its first approval. Further, this Policy shall be disseminated on the website of the Company. In addition, the details of establishment of vigil mechanism/whistle blower policy and affirmation that no personnel has been denied access to the Audit Committee, shall be included in the annual report of the Company.

RETENTION OF DOCUMENTS

All disclosures in writing or documented along with the results of investigation relating thereto, shall be retained by for a period of 8 (eight) years or such other period as specified by any other law in force, whichever is more.

AMENDMENT

The Board reserves the right to amend, suspend or rescind this Policy in whole or in part, at anytime without assigning any reason, whatsoever. Whilst, the Company has made best efforts to define detailed procedures for implementation of this Policy, there may be occasions when certain matters are not addressed or there may be ambiguity in the procedures. Such difficulties or ambiguities will be resolved in line with the broad principles under this Policy.