

WHISTLE BLOWER POLICY / SPEAK UP POLICY

OF

TRAVEL FOOD SERVICES LIMITED

1. Policy Statement

Travel Food Services Limited and its subsidiaries (together, the "Group" or "TFS" and individually a "Group Company") are committed to conducting our business with honesty and integrity, and the Group expects all colleagues to maintain exacting standards. A culture of transparency and trust, openness and accountability is essential to prevent wrongdoing occurring and to address it if it does occur.

2. Purpose

2.1 The aim of this policy is:

- 2.1.1 to encourage colleagues to report suspected wrongdoing as soon as possible, with the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- 2.1.2 to provide colleagues with guidance as to how to raise those concerns.
- 2.1.3 to reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 2.1.4 provide a vigil mechanism for its directors and employees.

This policy should be read in conjunction with the Group's other policies including the Code of Conduct and the Ethics Policy.

3. Who Is Covered by This Policy?

This policy applies to all individuals working at all levels of the Group, including senior managers, officers, directors, employees, consultants, contractors, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as "colleagues" or "you" in this policy) in all divisions and subsidiaries.

4. What Is Speak Up (Whistleblowing)?

- 4.1 Speak Up is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include criminal activity; injustices; danger to health and safety; damage to the environment; failure to comply with any legal obligation; bribery; negligence; breach of our internal policies and procedures; or the deliberate concealment of any of these matters.
- 4.2 You should raise a concern under this policy if you have a genuine belief that an actual or suspected wrongdoing or negligence may have affected, is affecting or will affect any of TFS's activities.

- 4.3 This policy should not be used for complaints relating to your personal circumstances, for example, the way you have been treated at work, or for bullying and harassment complaints. In those cases, you should refer to and use the Grievance Procedure.
- 4.4 If you are uncertain whether something is within the scope of this policy, you should seek advice from your Speak Up Officer / Vigilance Officer.

5. Raising A Speak Up (Whistleblowing) Concern

- 5.1 We hope that in any instance you will be able to raise any concerns with the Human Resources department. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to your Speak Up Officer / Vigilance Officer.
- 5.2 Any concerns and/or complaints against Directors, Key Managerial Personnels and Senior Management Personnel of the Company under Speak-up mechanism should be directly intimated to the Chairman of the Audit Committee
- 5.2 However, where the matter is more serious, or you feel that your line manager or the Human Resources department has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:
 - 5.2.1 Your Speak Up Officer / Vigilance Officer; or
 - 5.2.2 Head of Revenue Assurance Team (“**RA Team**”); or
 - 5.2.3 Our confidential TFS Group Helpline (where concerns can be reported anonymously if necessary) telephone numbers for this are available on the Company official website and displayed at conspicuous places in our units/stores/lounges or
 - 5.2.4 Chairman of Audit Committee if the same is not resolved in above categories.

6. Confidentiality

- 6.1 We hope that colleagues will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, the Group will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, the Group will discuss this with you. No colleague will suffer demotion, penalty, or other adverse consequences for voicing concerns under this policy unless there are false allegations with ulterior motive, which is proven (as per paragraph 10 of this policy).
- 6.2 We do not encourage colleagues to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Group cannot obtain further information from you. If you are concerned about possible reprisals if your identity is revealed, then you should speak to your Speak Up Officer or one of the other contact points listed in paragraph 5 and appropriate measures can then be taken to preserve confidentiality.

7. External Disclosures

- 7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace
- 7.2 Speak Up concerns usually relate to the conduct of our colleagues, but they may sometimes relate to the actions of a third party, such as a customer, supplier, or service provider. You should contact your line manager or the Human Resources department or one of the other individuals set out in paragraph 5 for guidance.

8. Investigation and Outcome

- 8.1 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 8.2 Following this meeting, the Group will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings to provide further information.
- 8.3 In some cases, the Group may appoint an investigator or team of investigators including colleagues with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimize the risk of future wrongdoing.
- 8.4 We will aim to keep you informed of the progress of the investigation and its timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 8.5 If the Group concludes that you have deliberately made false allegations, you will be subject to disciplinary action.
- 8.6 In case of repeated frivolous complaints being filed by any director or employee of Group, the Audit Committee shall take suitable action against the concerned director or employee including reprimand.

9. If You Are Not Satisfied

- 9.1 While the Group cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 9.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 5.

10. Protection and Support for Whistleblowers

- 10.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support colleagues who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 10.2 Colleagues must not suffer any detrimental treatment because of raising concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your Speak Up Officer immediately.
- 10.3 Colleagues must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

11. Responsibility for The Success of This Policy

- 11.1 The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 11.2 We have a Speak Up Officer and who has ultimate responsibility for (a) ensuring that respective business areas establish systems and controls to comply with this policy and (ii) periodically monitoring it. This includes:
 - day-to-day operational responsibility for this policy.
 - implementing communication mechanisms to ensure that this policy is embedded and understood throughout the organisation.
 - ensuring adequate staffing levels to meet the requirements of this policy.
 - ensuring all relevant employees receive appropriate training.
 - ensuring conformance of controls implementing this policy.
 - ensuring smooth and prompt onward reporting under this policy.
- 11.3 The designated person with overall responsibility for this Policy is Head of Human Resources, (**“Speak Up Officer” / “Vigilance Officer”**) who will discuss the results periodically with the Audit Committee. The relevant people who are obliged to comply with this policy will be notified of any resultant changes.
- 11.4 TFS will maintain a record of all reports made under this policy including details of the investigation and the outcome of those investigations. These records will be retained for at least five years from the date of recording.
- 11.5 All colleagues are responsible for the success of this policy and should ensure that they use it to disclose any suspected wrongdoing. Queries on the policy should be addressed to your Speak Up Officer.

12. Access to Chairperson of the Audit Committee

The Whistle Blower shall have right to access chairperson of the Audit Committee directly in appropriate or exceptional cases and the chairperson of the Audit committee is authorised to prescribe suitable directions in this regard, as may be deemed fit.

13. Communication

This Policy shall be disseminated on the website of the Company and in our [units]. 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.

14. Governance

Being part of SSP Group plc, the Company is committed to maintaining high standards of corporate governance. While striving to align its policies with group-wide policies wherever appropriate, the Company will ensure compliance with applicable laws and consider local circumstances and best practices of its Promoters.

15. Monitoring and Review

- 15.1 TFS will periodically review the implementation of this policy in respect of its suitability, adequacy and effectiveness and is committed to making improvements as appropriate.
- 15.2 In case of any subsequent changes in the provisions of the applicable law or any other regulations which makes any of the provisions in the policy inconsistent with the applicable laws or regulations, then the provisions of the relevant applicable laws or regulations would prevail over the policy and the provisions in the policy would be modified in due course to make it consistent with law.