

## LEGAL AND COMPLIANCE POLICIES

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

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|------------|---------------------|
| Department | Legal               |
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#### 1. STATEMENT OF POLICY

WeWork India (“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.

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”).

All Employees/Third Parties may contact the respective WEWORK supervisor, Department Head, the Head of People, the Compliance Captains or the General Counsel, 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 Ethicsline administered by Integrity Matters, a third party provider. Employees/Third Parties can also access Integrity Matter’s separate website at <https://wework.integritymatters.in>

#### 2. 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.

By raising questions and concerns, Employees help 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.

### 3. 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.

### 4. 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 Compliance Captains or the General Counsel, 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 Ethicsline reporting channels:

| # | Reporting Channel | Contact Details   | Availability                             |
|---|-------------------|---|--|
| 1 | Phone             | - India Toll-Free: 1800-102-6969  | 9:00 am to 11:00 pm IST, Monday-Saturday |
| 2 | Web Portal        | <a href="https://wework.integritymatters.in">https://wework.integritymatters.in</a>   | 24x7                                     |
| 3 | Email             | <a href="mailto:wework@integritymatters.in">wework@integritymatters.in</a>  | 24x7                                     |
| 4 | Post              | Wework India Management Private Limited, C/o Integrity Matters, Unit 1211, CENTRUM, Plot No C-3, S.G. Barve Road, Wagle Estate, Thane West – 400604, Maharashtra, India | 24x7                                     |

**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 of 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.

## **B. CONFIDENTIALITY**

A Whistleblower’s identity shall be treated as confidential at all times unless disclosure is required by law or the 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.

### **C. 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 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.

### **D. 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.