VIGIL MECHANISM AND WHISTLE-BLOWER POLICY

(Revised on August 5, 2026)

Pursuant to SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 & Companies Act, 2013

1. INTRODUCTION

Thrive Future Habitats Limited (Formerly Ador Multiproducts Limited) (the "**Company**") is committed to the highest standards of ethical, moral and legal conduct of business operations. Unethical behavior, fraud, violation of the codes of conduct or policy, or leak of unpublished price sensitive information pertaining to the Company can lead to damage of the Company's activities and reputation.

The Company encourages all its employees including Directors to report in good faith without fear of punishment or unfair treatment, on actual or suspected actions due to dishonesty that require combating practices to safeguard Company's integrity.

The Company has therefore, formulated a policy to enable employees of the Company to report to the management instances of fraud or violation of the Company's code of conduct and has lays down the principles and standards that should govern the actions of the Company and their employees. Any actual or potential violation of the policy howsoever insignificant or perceived as such, would be a matter of serious concern for the Company.

2. BASIC GUIDELINES

The Policy has been framed and adopted by the Company in compliance with the provisions of Section 177(9) of the Companies Act, 2013 (the "**Companies Act**") read with Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014 (the "**Companies Board Meetings Rules**") and Regulation 22 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "**SEBI Listing Regulations**"), which requires mandatory establishment of vigil mechanism for the directors and employees of the Company to report their genuine concerns in the prescribed manner.

Regulation 9A (6) of the Securities and Exchange Board of India (Prohibition of Insider Trading Regulations), 2015 (the "**SEBI Insider Trading Regulations**") requires that every listed company establishes a Whistle Blower Policy ("**Policy**") for the purposes of reporting instances of leak of unpublished price sensitive information.

Reference to statutory provisions or regulations shall be construed as meaning and including references to any amendment or re-enactment and any amendments to any statutory provisions or regulations or clarifications applicable to the Policy shall automatically be deemed to be included in the policy, without any further amendment of the policy by the Board or relevant committee of the Board of Directors.

3. OBJECT

The Policy is defined to:

a) provide a framework for a fair and efficient way of dealing with whistleblowing incidences by respecting the rights of all parties involved;
b) transparently communicate Company's investigation process on such reporting;
c) assure the whistle blower (one who reports in good faith) on utmost confidentiality and effective protection against any retaliation or reprisals, whether actual or threatened, as a result of whistleblowing; and
d) affirm direct access to the Chairman of the Audit Committee in exceptional cases.

This Policy applies to all whistleblowing concerns relating to actual or suspected misconduct, malpractice, unethical behaviour, fraud, or any other matter covered under the section

"Whistleblowing Complaints", committed by employees of the Company while within or outside the Company's premises, where such conduct may adversely affect the Company's integrity, ethical standards, operations, reputation, or compliance with applicable laws.

4. DEFINITIONS AND INTERPRETATION

In this Policy, words and expressions shall have the meaning assigned to them below:

a. **“Alleged wrongful conduct"** shall mean violation of law, Infringement of Company’s rules, misappropriation of monies, actual or suspected fraud, leak of unpublished price sensitive information as defined under the Insider Trading Regulations, substantial and specific danger to public health and safety or abuse of authority.

b. **“Board of Directors"** shall mean all the members of the Board of Directors of the Company, including the Independent Directors.

c. **“Company"** shall mean Thrive Future Habitats Limited (Formerly Ador Multiproducts Limited).

d. **"Audit Committee"** shall mean the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013 and the applicable provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

e. **“Employee"** shall mean all the present employee, officers or director of the Company.

f. **“Good Faith"** An employee shall be deemed to be communicating in ‘good faith’ if there is a reasonable basis for communication of unethical and improper practices or any other alleged wrongful conduct. Good Faith shall be deemed lacking when the employee does not have personal knowledge on a factual basis for the communication or where the employee knew or reasonably should have known that the communication about the unethical and improper practices or alleged wrongful conduct is malicious, false or frivolous.

g. **“Policy"** shall mean this Vigil Mechanism/ Whistle Blower policy.

h. **“Protected Disclosure"** shall mean a concern raised by an employee or group of employees of the Company, through a written communication and made in good faith which discloses or demonstrates information that may evidence unethical or improper activity under the title "Scope of the Policy" with respect to the Company. It should be factual and not speculative or in the nature of an interpretation / conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.

i. **“Subject"** shall mean a person or group of persons against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.

j. **“Whistle Blower"** means an Employee making a Protected Disclosure under this Policy.

The terms used but not defined in this Policy shall have the same meaning as assigned to them under the Listing Regulations.

5. APPLICABILITY

All Employees of the Company are eligible to make Protected Disclosures under the Policy. The Protected Disclosures will be in relation to matters concerning the Company.

6. TYPES OF MISCONDUCT AND COMPLAINTS

Types of misconducts due to dishonesty that can be reported as Whistleblowing complaints are broadly categorized, but not limited to, as listed below:

a. Fraud related: Complaints under this category include acts of financial misconduct such as accounting fraud or asset related fraud or breach of law or leak of unpublished price sensitive information etc.

b. Corruption related: Complaints against staff, contractors, suppliers and borrowers (and / or their affiliates) that can be reported under this category include acts of corruption, bribery, theft etc.

c. Workplace related: Complaints under this category includes acts of (a) work-place harassment; (b) sexual harassment including verbal abuse; (c) intimidation/threatening; (d) conflict of interest (includes gifts, favors and entertainment by / to internal other staff or third-parties); (e) willful negligence of Company rules; (f) discrimination on grounds of sex, race or disability or religion (g) Nepotism etc.

d. Others: Complaints under this category includes acts of (a) Any illegality or manipulation; (b) Damage to environment; (c) Gross waste of money, material, time or resources; (d) Abuse of authority; (e) Substantial and specific danger to public health or safety; and (f) Any other activity, which undermines the Company's responsibility to its stakeholders.

7. ROLE OF A WHISTLE BLOWER

The Whistle Blower's role is that of a reporting party with reliable information. They are not required or expected to act as investigator(s) or finder(s) of facts, nor would they determine the appropriate corrective or remedial action that may be warranted in a given case. Whistle Blowers should not act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by the Audit Committee or the Investigator(s). Protected Disclosure will be appropriately dealt with by the Audit Committee.

8. DISQUALIFICATIONS

While it will be ensured that genuine Whistle Blowers are given complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will attract disciplinary action. Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention. Whistle Blowers, who make three or more Protected Disclosures, which have been subsequently found to be mala fide, frivolous, baseless, malicious, or reported otherwise than in good faith, will be disqualified from reporting further Protected Disclosures under this Policy. In respect of such Whistle Blowers, the Company/ Audit Committee would reserve its right to take/recommend appropriate disciplinary action.

9. PROCEDURE

a) In respect of all Protected Disclosures, including those relating to employees or concerning financial/accounting matters, the disclosures should be addressed to the Audit Committee of the Company for investigation.

b) If a protected disclosure is received by any executive of the Company other than the members of Audit Committee, the same should be forwarded to the members of Audit Committee for further appropriate action. Appropriate care must be taken to keep the identity of the Whistle Blower confidential.

c) Protected Disclosures should preferably be reported in writing so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English or Hindi. Alternatively, Protected Disclosures can also be reported orally, which will normally be documented by the Audit Committee accessing the voice mail by a written transcription of the oral report.

d) The Protected Disclosure should be forwarded under a covering letter which shall bear the identity of the Whistle Blower. The Chairman of the Audit Committee shall detach the covering letter and forward only the Protected Disclosure to the Investigators for investigation.

e) Protected Disclosures should be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.

f) For the purpose of providing protection to the Whistle Blower, the Whistle Blower should disclose his/her identity in the covering letter forwarding such Protected Disclosure.

10. INVESTIGATION

a) All Protected Disclosures reported under this Policy will be thoroughly investigated by the Audit Committee of the Company who will investigate / oversee the investigations under the authorization of the Audit Committee.

b) The Audit Committee may at its discretion, consider involving any Investigators for the purpose of investigation.

c) The decision to conduct an investigation taken by the Audit Committee is by itself not an accusation and is to be treated as a neutral fact- finding process. The outcome of the investigation may not support the conclusion of the Whistle Blower that an improper or unethical act was committed.

d) The identity of a Subject and the Whistle Blower will be kept confidential to the extent possible given the legitimate needs of law and the investigation.

e) Subjects will normally be informed of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation.

f) Subjects shall have a duty to co-operate with the Audit Committee or any of the Investigators during investigation to the extent that such co-operation will not compromise self-incrimination protections available under the applicable laws.

g) Subjects have a right to consult with a person or persons of their choice, other than the members of the Audit Committee and/or the Whistle Blower. Subjects shall be free at any time to engage counsel at their own cost to represent them in the investigation proceedings.

h) Subjects have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated by the Subjects.

i) Unless there are compelling reasons not to do so, Subjects will be given the opportunity to respond to material findings contained in an investigation report. No allegation of wrongdoing against a Subject shall be considered as maintainable unless there is good evidence in support of the allegation.

j) Subjects have a right to be informed of the outcome of the investigation. If allegations are not sustained, the Subject should be consulted as to whether public disclosure of the investigation results would be in the best interest of the Subject and the Company.

k) The investigation shall be completed normally within 45 days of the receipt of the Protected Disclosure.

11. DECISION REPORTING

If an investigation leads the Audit Committee to conclude that an improper or unethical act has been committed, the Audit Committee shall recommend to the management of the Company to take such disciplinary or corrective action as it may deem fit. It is clarified that any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

12. CONFIDENTIALITY

All whistleblowers/complainant should be aware that there are significant rights and protections available to individuals who identify themselves while submitting a Protected Disclosure. These rights and protections may be lost if a Protected Disclosure is on an anonymous basis. Therefore, the Company encourages all Employees to identify themselves when making a Protected Disclosure.

In responding to Protected Disclosure, the complainant, Audit Committee members, the Subject and everybody involved in the process shall pay due regard to:

a) Maintain confidentiality of all matters under this Policy;
b) Discuss only to the extent or with those persons as required under this Policy; for completing the process of investigations;
c) Not keep the papers unattended anywhere at any time; and
d) Keep the electronic mails / files under password.

13. PROTECTION

a) No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers. Complete protection will, therefore, be given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his/her duties/functions including making further Protected Disclosure. The Company will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure. Thus, if the Whistle

Blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower to receive advice about the procedure, etc.

b) A Whistle Blower may report any violation of the above clause to the Audit Committee, which shall investigate into the same and recommend suitable action to the management.

c) The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law.

d) Any other Employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.

14. ACCESS TO CHAIRMAN OF THE AUDIT COMMITTEE

The Whistle Blower shall have right to access Chairman of the Audit Committee directly in exceptional cases and the Chairman of the Audit Committee is authorized to prescribe suitable directions in this regard.

15. RETENTION OF DOCUMENTS

All Protected disclosures in writing or documented along with the results of Investigation relating thereto, shall be retained by the Company for a period of 3 (Three) years or such other period as specified by any other law in force, whichever is more.

16. ADMINISTRATION AND REVIEW OF THE POLICY

The Audit Committee of the Company shall be responsible for the administration, interpretation application and review of this policy. The Audit Committee of the Company also shall be empowered to bring about necessary changes to this Policy, if required at any stage.

The concerns raised under the Policy shall be reported periodically to the Audit Committee.

17. AMENDMENT

Any subsequent amendment / modification in the Listing Regulations or any other governing Act / Rules / regulations or re-enactment, impacting the provisions of this Policy, shall automatically apply to this Policy and the relevant provision(s) of this Policy shall be deemed to be modified and / or amended to that extent, even if not incorporated in this Policy.

The Board may review and amend this Policy from time to time, as may be deemed necessary.

18. EFFECTIVE DATE

This policy shall be effective from date of adopting the said policy by the Board.

19. DISSEMINATION OF THE POLICY

The policy will be hosted on the Company’s website.