



HOMESHREE HOUSING FINANCE LIMITED (HHFL)

WHISTLE BLOWER POLICY

Summary of Policy

Policy Name	WHISTLE BLOWER POLICY
Date of Implementation	29.04.2025
Date of current review	25.03.2026
Version No.	02
Owner / Contact	Compliance Department
Approver	Board of Directors
Annexures	-

WHISTLE BLOWER POLICY / VIGIL MECHANISM

1. PREAMBLE

HomeShree Housing Finance Limited (“HHFL”) believes in the conduct of the affairs of its various constituents in a fair and transparent manner, by adopting the highest standards of professionalism, honesty, integrity and ethical behavior and open communication.

Pursuant to NHB Guidelines applicable to Housing Finance Companies, the Company establishes this Whistle Blower Policy (Vigil Mechanism) to provide a framework for reporting genuine concerns about unethical behavior, fraud, misconduct, or violation of laws.

2. OBJECTIVES

- To establish a mechanism for employees to report to the management instances of unethical behavior, actual or suspected fraud or violation of the Company’s code of conduct or ethics policy.
- To provide a framework to promote responsible and secure whistle blowing. It protects employees from raising a concern about serious irregularities within the Company.
- To provide necessary safeguards for protection to employees from reprisals or victimization, for whistle blowing in good faith. The Policy neither releases an employee from their duty of confidentiality, in the course of their work, nor is it a route for taking up a grievance about a personal situation.

3. APPLICABILITY

This policy applies to:

- All the Directors of the Company
- All Employees of the HHFL and its respective affiliate/ group company as the case may be; and
- All permanent and contractual employees of HHFL are eligible to raise Protected Disclosure under the Policy. The Protected Disclosure raised should be in relation to matters concerning HHFL only.

4. SCOPE OF REPORTABLE MATTERS

The following concerns may be reported under this policy:

- Fraud or suspected fraud
- Financial irregularities or manipulation of records
- Bribery or corruption

- Violation of Company policies
- Conflict of interest
- Misuse of company assets
- Harassment or unethical conduct
- Any criminal offence

5. REPORTING MECHANISM

Concerns may be reported through:

- Email: compliance@homeshree.com
 - Written complaint addressed to
HomeShree Housing Finance Limited
Corporate Office: Plot no 108 Ground Floor Block C Sector 2 Noida Uttar Pradesh 201301
- Anonymous complaints should be supported by credible evidence.

6. VIGIL MECHANISM / AUDIT COMMITTEE ROLE

- The Audit Committee shall oversee the Vigil Mechanism.
- All complaints shall be reviewed by the Compliance Officer.
- Serious complaints shall be placed before the Audit Committee.
- The Committee may order an internal investigation or appoint external experts.

7. INVESTIGATION PROCESS

- A preliminary review will be conducted within 7 working days.
- If required, a formal investigation will be initiated.
- The whistleblower may be contacted for additional details.
- Confidentiality shall be maintained throughout.
- The investigation shall be completed within a reasonable time.

8. PROTECTION TO WHISTLE BLOWER

The Company assures:

- Protection against victimization.
- No retaliation, discrimination or harassment.
- Confidential handling of identity.
- Direct access to Chairman of Audit Committee in exceptional cases.

Any retaliation shall result in disciplinary action.

The company will not tolerate any attempt on the part of anyone to retaliate, apply any sanction or disadvantage or to discriminate against any person who has reported to the company serious and genuine concern regarding an apparent wrong doing. Any infractions of the Code of Conduct of

the company by the complainant after raising the complaint may however invalidate the protection provided under this Policy. Protection under the Policy shall be available to the employee who raises the concern under this Policy till such time that the complainant's employment subsists with the company. An employee who wishes to raise a concern in respect of any disciplinary action or any act of retaliation as defined in this Policy against the concerned employee can do so within 3 months of such action or act of retaliation. After this time period has elapsed, the concern, if raised shall not be treated as a concern under this Policy

9. FALSE OR MALICIOUS COMPLAINTS

If a complaint is found to be deliberately false, malicious, or frivolous, the Company reserves the right to take disciplinary action.

10. CONFIDENTIALITY

An employee may choose to send communication under this policy on an anonymous basis. However, employees are encouraged to disclose their identities while raising concerns under this Policy. This will assist in obtaining additional details or evidence as may be required during the inquiry. Identity of the complainant(s) shall be treated as confidential and shall not be disclosed. This would not have any impact on the employee's performance appraisal, assignment of work or other matters related to employment.