

## **Ashiana Housing Limited**

### **Vigil Mechanism as part of the Whistle Blower Policy**

Originally adopted by the Board of Directors on 30<sup>th</sup> May 2014

1. "The directors and employees of the company, across all the branches, have the right to report, whether in writing or by email, their genuine concerns and grievances, including unethical behaviour, actual or suspected fraud or violation of the company's code of conduct or ethics policy, any suspected violation of any law that applies to the Company including possible accounting or financial reporting violations, insider trading, leak of unpublished price sensitive information, bribery, directly to Mr. Vishal Gupta, Managing Director of the company."
2. "However, in exceptional cases, the directors and employees of the company may directly report to the Chairman of the Audit Committee, presently Mr. Narayan Anand at [narayan\\_anand63@yahoo.com](mailto:narayan_anand63@yahoo.com), and in the absence of such Chairman then directly to Mr. Varun Gupta, Whole Time Director of the company and also Member of the Audit Committee."
3. "The onus of proving that the matter proposed to be reported falls in the category of exceptional cases, in clause (2), will be on such Director or employee."
4. "The directors or employees who report or avail the vigil mechanism, as above, shall not become subject of victimisation."
5. "The Audit Committee of the company shall oversee the vigil mechanism and in case any members of the committee have a conflict of interest in any given/ reported case then the remaining members who do not have any such conflict interest shall oversee the vigil mechanism."
6. "In case of repeated frivolous complaints filed by a director or an employee, the Audit Committee may take suitable action against the concerned director or employee."