

WHISTLE BLOWER POLICY

(Framed on 06/05/2015 & last reviewed on 14/11/2022)

1. INTRODUCTION:

GIC Housing Finance Ltd. ("the Company") believes in conducting business in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behavior.

This Whistle Blowing (the Policy) is in furtherance of the Company's desire to strengthen the Company's system of integrity and enable all individuals to voice concerns internally in a responsible manner when they discover information which results into malpractice or impropriety within the Company.

It is consistent with the established **GIC Housing Finance Limited (Conduct, Discipline & Appeal) Rules, 2008 (the CDA Rules)**.

The subject policy is now being amended so as to bring it in line with the amendments to the SEBI (Prohibition of Insider Trading) Regulations, 2015.

2. PURPOSE :

The purpose of the Company to introduce Whistleblower policy is to establish and provide an internal mechanism to report the management concerns about unethical behavior, actual or suspected fraud or violation of the CDA Rules of the Company or ethics policy.

Section 177(9) of the Companies Act, 2013 and Regulation 22 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 along with other Guidelines on Corporate Governance, provide, requirement, to establish a vigil mechanism / **"Whistle Blower Policy"** for employees to report to the management instances of unethical behaviour, actual or suspected fraud or violation of the Company's code of conduct.

3. SCOPE AND APPLICABILITY:

This policy covers situations where an individual (the Whistleblower) raises a concern about a risk, malpractice or wrongdoing that affects others such as the Company, its staff and all concerned. This policy applies to all people who work for the Company. References in this policy to **"Employee"** shall include Regular Employees, or other trainees, Consultants, Retainers, Agency Staff etc.

4. POLICY COVERAGE:

Any employee may report allegations of suspected improper activities. Such report is encouraged to be made in writing to assure a clear understanding of the issues raised. Such report should be factual and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of preliminary investigative procedures.

“Whistle blowing” means a disclosure of information relating to any of the following (irrespective of whether the matter complained of is happening now, took place in the past or is likely to happen in the future) :

- 1) Abuse of authority
- 2) Submission of incorrect financial reporting,
- 3) Manipulation of the Company’s data/Records
- 4) Financial irregularities, including fraud or suspected fraud
- 5) Pilferage of confidential Company information
- 6) Wastage/misappropriation of Company funds/assets
- 7) Deliberate violation of law/regulation
- 8) Negligence causing danger to individual/public health
- 9) Instances of leakage of Unpublished Price Sensitive Information
- 10) Breach of Contract
- 11) Criminal Offence
- 12) General misconduct, which means failure to observe the Company’s Rules defined in Rule 4 of the Company’s CDA Rules.
- 13) General Malpractice – such as immoral illegal or unethical conduct.
- 14) Any other activity, prejudicial to the interest of the Company.

5. PROCEDURE FOR RAISING THE CONCERN :

If any employee is aware of any conduct falling within that identified in the Qualifying Disclosure, he/she is urged to come forward as soon as possible. However, it is best that problems are brought to the attention of the Company as early as possible so that they can be addressed before becoming too serious.

Whistle Blowers can raise their concerns in writing to any of the following designated officials:

All protected disclosures pertaining to Financial and Accounting Matter (including Unpublished Price Sensitive Information) shall be addressed to:	In respect of any other Protected Disclosures, shall be addressed to :
Chairman of Audit Committee	In Charge of - Vigilance Department / Chief Vigilance Officer
[AND]	
Company Secretary & Compliance Officer	

The concerned designated officials are responsible for ensuring that the Policy is implemented effectively.

Whistle Blower must put his/her name on the disclosure. Employees can be assured that if they come forward with any concern, everything possible will be done to respect their confidentiality. If the Company discovers that any other employee had victimized that employee, this would be treated as a serious disciplinary offence.

6. DISQUALIFICATION:

There will be no adverse consequences for anyone who reports a whistle blowing concern in good faith.

However, at no point, employees should use this platform as a route for taking up personal grievances against someone.

7. INVESTIGATION:

Investigation shall be launched, if the Competent Authority is satisfied after preliminary review that the alleged act constitutes an improper or unethical activity or conduct.

The investigation will be carried out in a fair manner, as a neutral fact finding process and without presumption of guilt and if appropriate, disciplinary action will be taken against the person/s who are subject to the allegation/s, as per Company's CDA Rules.

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