



VIGIL MECHANISM POLICY

AKME STAR HOUSING FINANCE LIMITED
CIN -L45201RJ2005PLC020463
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Subcity Center Savina Circle
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VIGIL MECHANISM POLICY

Preamble

- ***Akme Star Housing Finance Limited (hereinafter referred to as 'Company') believes in conducting the affairs of the business and operations in fair and transparent manner by adopting high level of professionalism, integrity and ethical behavior.***
- The Companies Act 2013 under the provisions of Section 177 has mandated that “every listed Company or such class or classes of companies, as may be prescribed, shall establish a vigil mechanism for employees/directors to report concerns about unethical behavior actual or suspected fraud or violation of the company’s code of conduct or ethics policy.
- In view of above the Company has set up and adopted the following Vigil Mechanism which lays down the principles and standards governing the management of grievances and concerns of employees and directors of the Company and shall be overseen by the Audit Committee (hereinafter referred to as ‘Committee’) of the Company. The Mechanism as set up herein-below shall enable the employees and the directors of the Company to report their genuine concerns or grievances about the actual and potential violation of the principles and standards laid down herein.

Mechanism

1. Objectives:-

- To encourage the employees and directors to report unethical behavior malpractices, wrongful conduct, fraud, violation of the company’s policies & values, violation of law by any employee/director of the Company without any fear of retaliation.
- To minimize the Company's exposure to the damage that can occur when the employees actually or potentially try to circumvent internal mechanisms in furthering the aforementioned concerns, violation and frauds.
- To let employees know that the Organization is serious about adherence to Code of conduct or policy.

2. Applicability

All employees/directors of the Company should continuously report and review any information on suspected unethical or improper or malpractices or wrongful conduct, which officials in good faith believes to exist, Some of they may be as follows:

1. Breach of the Company's Code of Conduct
 2. Brach of Business Integrity and Ethics
 3. Intentional Financial irregularities, including fraud, or suspected fraud
 4. Manipulation of Company data / records
 5. An abuse of authority
 6. Leaking confidential or proprietary information
 7. Violation of any law or regulations
 8. Activities violating policies including Code of Ethics and Conduct
- (The above list is illustrative and should not be considered as exhaustive.)



3. **Procedure:-**

1. All Protected Disclosures should be reported to Head (HR) by
 - Sending email to mail.akmestarthousing.com, and/or
 - By writing the application .
2. The Complainant shall address the Complaints / Grievances to the Vigilance Officer (as may be designated by the Audit Committee) of the Company or the Chairman of the Audit Committee (in exceptional cases). The duly filled complaint form provided herein shall be submitted to *any* of the above mentioned person(s):
3. In order to protect the identity of the complainant, the Vigilance Officer or the Committee will maintain confidentiality of the complainants.
4. The Committee on the receipt of disclosure of any of above frauds or events shall make a record of the disclosure and also ascertain from the complainant whether he was the person who made the disclosure or not. The Committee shall also carry out initial investigation either itself or at its discretion by involving any other official of the Company or an outside agency as it may deem fit.
5. Any member of the Audit Committee or such other officer involved in the investigation, having any conflict of interest with the matter shall disclose his/her concern/interest forthwith and shall not deal with the matter.
6. The Committee as it deems fit, may call for further information from the complainant.
7. The Committee shall carry out detailed investigation if the reported disclosure is found to be correct.
8. The Employee/Director against whom disclosure has been reported shall:-
 - Co-operate with Committee or any person appointed in this regard.
 - Have a right to consult any person of his choice other than members of Committee and / or Complainant.
 - Not interfere in investigations conducted by Committee.
 - Not withhold, tamper or destroy any of evidences.
 - Unless otherwise restricted, be given an opportunity to respond to material findings.
 - Not threaten, influence or intimidate complainant or any of witnesses.
 - Have a right to know the outcomes of investigation.
9. The Investigations shall be completed within a period of 60 days.

4. **Decisions and Reporting**

If the outcome of the investigation leads to a conclusion that, any improper or unethical act has been committed, then the Committee must record the same and recommend the Complaint along with the findings of the Committee upon investigation to the management for the disciplinary or corrective action to be taken against the concerned employee/director. The decision of the Committee shall be recorded with reasons and a copy of the same shall be forwarded to the complainant and the subject.

If the decision is not to the satisfaction of the complainant then the complainant has the right to report the event to the appropriate legal or investigating authority. However, if the complainant makes false or wrong allegations then disciplinary actions in accordance with the rules, procedures and policies of the Company shall be taken against the complainant as the Committee may decide.

**5. Penalties**

If the alleged fraud or misconduct is proven after investigation, the Committee may impose such penalty / fine as it may deem fit depending upon nature of fraud or unethical act done by the person.

6. Secrecy and Confidentiality

The Committee as well as complainant shall:-

- 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 investigation.
- c. Not keep the papers unattended anywhere at any time.
- d. Keep the electronic mails / files under password and under safe custody.

7. Protection

- a. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against complainants. Complete protection will therefore be given to complainant 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 complainant's right to continue to perform his duties /functions including making further disclosure.
- b. The Company will take steps to minimize difficulties which the complainant may experience as a result of making the disclosure. Thus, if the complainant is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the complainant to receive advice about the procedure, etc.
- c. A complainant may report any violation of the above clause to the Chairman of the Committee, who shall investigate into the same and recommend suitable action to the management. The identity of the complainant shall be kept confidential to the extent possible and permitted under law. The identity of the complainant will not be revealed unless he himself has made either his details public or disclosed his identity to any other office or authority.
- d. In the event of the identity of the complainant being disclosed, the Committee is authorized to initiate appropriate action as per extent regulations against the person or agency making such disclosure. The identity of the complainant, if known, shall remain confidential to those persons directly involved in applying this mechanism, unless the issue requires investigation by law enforcement agencies.
- e. Any other employee assisting in the said investigation shall also be protected to the same extent as the Complainant. Provided however that the complainant before making a complaint has reasonable belief that an issue exists and that he has acted in good faith. This policy does not protect an employee from an adverse action taken independent of his disclosure of unethical and improper practice etc. unrelated to a disclosure made pursuant to this policy.

8. Amendments

The Company reserves right to amend, modify, and cancel any of the provisions of the mechanism in whole or in part set up herein above or may restrict subject to such conditions as it may deem fit.



Annexure 1

Date: _____

Name of Complainant (Employee/ Director) _____

Email-id _____

Address: _____

Contact No. _____

Subject matter which is being reported

Name of Person/Event focused at:

Brief about concern _____

Evidence (if Any) _____

Signature