



SASVITHA HOME FINANCE PVT LTD

WHISTLE BLOWER POLICY

VERSION 1

(Revised as on May 2019)

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WHISTLE BLOWER POLICY

Preamble

Sasvitha home Finance Private Limited believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour. With the above in context Sasvitha has framed this Whistle Blower Policy & Vigil Mechanism that shall govern the action of Sasvitha and its employees.

This policy shall provide an opportunity to the employees of Sasvitha home finance to raise concerns in case of any unethical and improper practices, any actual or possible violation of the employment rules or an event where the employee becomes aware of that could affect the business or reputation of Sasvitha and its employees. The policy shall direct the employees of a mechanism to approach the Audit committee that shall be instituted with the approval of the board of Sasvitha home finance.

Definitions

The definitions of some of the key terms used in this Policy are given below.

"Audit Committee" means the Committee constituted by the Board of Directors of Sasvitha home finance private limited.

"Employee" means every employee of Sasvitha including the Directors in the employment.

"Investigators" means those persons authorised, appointed, consulted or approached by Audit Committee and include the auditors of Sasvitha.

"Protected Disclosure" means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

"Subject" means a person against or in relation to whom a Protected Disclosure has been made or evidence gathered during the course of an investigation.

"Whistle Blower/ Complainant" means an Employee or Director making a Protected Disclosure under this Policy.

Scope

The Whistle Blower's role is that of a reporting party with reliable information. They are not required or expected to act as investigators or finders of facts, nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.

Disqualifications

While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant 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 Audit Committee would reserve its right to take/ recommend appropriate disciplinary action.

Protection to Whistle Blowers

No unfair treatment will be meted out to a Whistle Blower by virtue of his/ her having reported a Protected Disclosure under this Policy. Sasvitha 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 duties/ functions including making further Protected Disclosure.

Responsibility – Employees

- a) Co- operate with the audit committee maintaining full confidentiality
- b) Bring to concern any unethical or improper practices they become aware of
- c) Employees will normally be informed of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation.
- d) Avoid malicious allegations as it results in disciplinary action
- e) In case of non satisfaction with the investigation done by the investigators, he/she can directly appeal to the chairman of the audit committee

Responsibility – Audit Committee

- a) Conduct the investigation in a fair and unbiased manner ensuring the authenticity of facts.
- b) Maintain strict confidentiality
- c) All Investigators shall be independent and unbiased both in fact and as perceived. Investigators have a duty of fairness, objectivity, thoroughness, ethical behaviour, and observance of legal and professional standards.
- d) Recommend appropriate course of action – including dismissal / preventive measures.
- e) The audit committee shall minute every investigation and deliberations with a final report.

Procedure

- Serious concerns related to unethical and improper practices shall be disclosed as specified below.
- A filled in disclosure form (Annexure 1) addressed to the audit committee in a sealed envelope shall be sent.

- All discussion shall be minuted and a report shall be prepared after the completion of the investigation.
- The decision of the audit committee shall be final and binding

Notification

All department heads shall notify and communicate the contents of the policy to every employee. The new employees shall be informed about the policy. The policy as amended from time to time shall be updated in the company website.

Annexure 1

Disclosure form

Complainant information

Name of the employee

Employee ID

Designation

Email id

Communication address

Phone number

Violation matter in brief: ‘

Name of the subject:

List of supporting documents:

Date:

I declare that the complaint mentioned above is true and based on factual information.

Signature -----