

**ELDECO HOUSING AND INDUSTRIES LIMITED****VIGIL MECHANISM/WHISTLE BLOWER POLICY**

Dear All,

Eldeco Housing and Industries Limited ("Company") believes in conduct of its affairs in a fair and transparent manner while maintaining high standards of governance, personal ethics and seeks to induce and recognize the virtues of honesty, integrity and accountability with ethical behavior and adherence to laws, amongst its employees in the course of discharge of their duties and responsibilities.

The Company is committed to develop a culture where employees are encouraged to raise issues observed by them relating to unethical/ unfair/ unacceptable behavior or practices and to report instances of any fraud/ misconduct/ violation of Code or employment policies without any fear of reprisal or victimization for whistle-blowing in good faith.

In compliance with the requirement of Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, this Vigil Mechanism/Whistle Blower Policy ("Policy") has been formulated by the Company.

This policy shall be applicable to Directors, Officers and Employees of the Company and shall also extend to the Directors, Officers and Employees of its subsidiary Companies.

In keeping with the Company's Policy to create an environment where every employee feels free, safe and secure to report incidents of unethical behavior, actual or suspected incidents of fraud and other matters or activity that could adversely impact the Company's operations, business performance and / or reputation, we are pleased to inform that the Management of the Company has installed Suggestion Box at the Head Office of the Company at New Delhi/Lucknow.

Management ensures that:

- Such reported incidents would be investigated in a fair manner;
- Appropriate action would be taken in regard to the reported matter;
- No employee would be victimized or harassed for bringing such incidents to the attention of the Company and identity of such employee(s) would be kept confidential to the extent possible and as permitted under law.

**Eldeco Housing & Industries Ltd.**

Effective from April 1, 2019

However, false or frivolous allegations/complaints knowing it to be false, frivolous, malicious may result in disciplinary action. Generally anonymous or vague complaints are not encouraged. You are requested to give specific and actionable points in your suggestions/complaints.

Moreover, the Employees of the Company are also welcomed to share their ideas pertaining to any matter of the Company including but not limited to:

- How the Company can perform better ;
- How to reduce wastage in small things ;
- How to keep our employees/customers/vendors and other stakeholders happier ;
- System improvements: changes that can be done to make our processes efficient etc.

The keys of the Suggestion Box are with the Chairman cum Managing Director of the Company and will be opened by him only. In addition, you may also write such incidents/suggestions in confidence to:

**The Chairman cum Managing Director**

Eldeco Corporate Chamber—I, 2<sup>nd</sup> Floor,  
Vibhuti Khand (Opp. Mandi Parishad), Gomti Nagar,  
Lucknow—226010  
**md@eldecoproperties.com**

Directors, Officers and Employees of the Company also have the right to report concerns directly to the Chairman of the Audit Committee of the Company as per the Companies Act, 2013.

**LEAKAGE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

- Any instance of leak of Unpublished Price Sensitive Information should be on the basis of a direct first- hand experience of the Whistle Blower. It should not be based on any secondary, unreliable source such as grapevine or any other form of informal communication.
- The Whistle Blower may report leak of Unpublished Price Sensitive Information by an email to the Chairman cum Managing Director of the Company at e-mail ID **md@eldecoproperties.com** or Company's Compliance Officer at email id **chandni@eldecohousing.co.in** mentioning the subject line "Leak of unpublished price sensitive information".

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- On the basis of reporting, the Compliance officer along with CFO shall conduct examination about the genuineness of the reporting before conduct of inquiry.
- The Compliance Officer along with CFO as soon as ascertaining the genuineness of the reporting about leak of Unpublished Price Sensitive Information, intimate to the Audit Committee and the Board.
- The Company shall take further action based on the recommendations of Audit Committee accordingly.
- The instance of leak of Unpublished Price Sensitive Information made by the Whistle Blower must be genuine with adequate supporting data/proof. If it is established that the allegation was made with mala-fide intentions or was frivolous in nature or was not genuine, the Whistle Blower shall be subject to Disciplinary Action.
- If an inquiry has been initiated by the company in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, the relevant intermediaries and fiduciaries shall co-operate with the company in connection with such inquiry conducted by the company.

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