



SATYA Micro Housing

सर्वे भवन्तु सुखिनः

Finance Private Ltd

(Formerly known as Baid Housing Finance Private Limited)

WHISTLE BLOWER POLICY

Version 1.0

1.Introduction

SATYA Micro Housing Finance Private Limited (Formerly known as Baid Housing Finance Private Limited) (hereinafter referred as “Company” or “SMHFPL”) seeks to enable economically active poor to lead a better life and promote financial inclusion through providing access to the range of financial services. SMHFPL is registered as Housing Finance Company registered with National Housing Bank (NHB). The Company provides long-term housing loans to customers belonging to the Middle and Low-Income Groups in peripherals of urban India, semi-urban and rural India, SMHFPL provides its clients with home loans to full-fill their dreams of owning and dwelling unit.

2.POLICY

Company’s Code of Conduct requires its employees to observe high standards of business and personal ethics in conduct of their duties and responsibilities. As employees and representatives of the Company, they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The purpose of the Whistle Blower Policy (the “Policy”) is to encourage employees, who observe any unethical practice (whether or not a violation of law), to report matters without the risk of victimization, discrimination or disadvantage. The Policy applies to all employees working for the Company and its affiliates. A Whistle Blower or reporting mechanism such as is set out in the Policy, invites all employees to act responsibly to uphold the reputation of the Company and affiliates. The Policy aims to ensure that serious concerns are properly raised and addressed and are recognized as an enabling factor in administering good governance practices.

3.DEFINITIONS

1. **Employee:** - An employee is every bonafide employee currently in the employment of the SMHFPL.
2. **Retaliation/Victimization:** - Retaliation is any act, direct or indirect, recommended, threatened or taken against a Whistle Blower by any person because the Whistle Blower has made a disclosure pursuant to the Policy.
Retaliation includes overt/covert acts of:
 - Discrimination
 - Reprisal
 - Harassment
 - Vengeance
3. **Whistle Blower:** - A Whistle Blower means any employee who raises a concern in accordance with this Policy.
4. **Whistle Blowing ‘Concern’ or ‘Complaint’:** - Whistle blowing (also referred to as ‘complaint’ or ‘concern’) can be described as attracting management’s attention to information about potentially illegal and/or unacceptable practices.
Employees can raise concerns/issues, if any, which they have on the following or possibilities/apprehensions of:
 - Breach of any law, statute or regulation by the company
 - Issues related to accounting policies and procedures adopted for any area or item
 - Acts resulting in financial loss or loss of reputation
 - Misuse of office, suspected/actual fraud and criminal offences

4. Reporting of a Whistle Blower Concern/Complaint

The employee may send a communication directly in writing through a letter to Company Secretary (called Access Person) by email at elegantprimedev@gmail.com or by post at 505, 5th Floor, DLF Prime Tower, Okhla Industrial Area, Phase-1, New Delhi-110020 office address.

Within a reasonable time of receipt of the concern by the Access an acknowledgment shall be sent to the sender of the concern (where a return address or email address is available). The acknowledgment shall confirm receipt of the concern and inform the sender that the concern would be inquired into, appropriately addressed.

In case the concern does not fall within the ambit of the Whistle Blower Policy, the sender shall be informed that the concern is being forwarded to the appropriate department/authority for further action, as may be deemed necessary.

5. Administration of the Policy

- The Access Person, upon receipt of the concern or complaint shall immediately set in motion appropriate action to inquire into the matter.
- Inquiry into the concerns received under this policy shall normally be completed within 90 days of receipt of the concern. A concern shall be kept open until such actions are initiated/completed.
- The Access Person shall lay down operating guidelines for handling the disclosures, investigations, record retention, communication, process of reporting of actions taken etc.
- Based on a thorough examination of the findings, the Access Person shall submit the Report to the Managing Director / Audit Committee.
- If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. Reasonable and necessary steps will also be taken to prevent any further violations.

6. Protection

Protection to employees and prevention against retaliation, victimization or harassment of employees raising any concern under the Policy.

Any employee who makes a disclosure or raises a concern under the Policy will be protected, if the employee:

- Discloses the information in good faith
- Believes it to be substantially true
- Does not act maliciously nor makes false allegations and
- Does not seek any personal or financial gain

The company will not tolerate any attempt on the part of anyone to retaliate, apply any sanction or disadvantage or to discriminate against any person who has reported to the company serious and genuine concern regarding an apparent wrong doing.

Any infractions of the Code of Conduct of the company by the complainant after raising the complaint may however invalidate the protection provided under this Policy.

Protection under the Policy shall be available to the employee who raises the concern under this Policy till such time that the complainant's employment subsists with the company. An employee who wishes to raise a concern in respect of any disciplinary action or any act of retaliation as defined in this Policy against the concerned employee can do so within 3 months of such action or act of retaliation. After this time period has elapsed, the concern, if raised shall not be treated as a concern under this Policy.

Any attempt on the part of any employee to misuse the policy for personal advantage will be dealt strictly.

7. Confidentiality and Anonymity

An employee may choose to send communication under this policy on an anonymous basis. However, employees are encouraged to disclose their identities while raising concerns under this Policy. This will assist in obtaining additional details or evidence as may be required during the inquiry. Identity of the complainant(s) shall be treated as confidential and shall not be disclosed. This would not have any impact on the employee's performance appraisal, assignment of work or other matters related to employment.