



VIGIL MECHANISM POLICY

Document Title	Vigil Mechanism Policy
Approved by	Administrator
Policy Owner	Ms. Divyani Chand, Chief Compliance Officer & Company Secretary
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Version No.	1.2/ 2024-25

VIGIL MECHANISM POLICY

BACKGROUND

As per Section 177 of the Companies Act, 2013 read with the Rules thereunder, AVIOM India Housing Finance Private Limited (the Company) is required to establish a Vigil Mechanism for the Directors and Employees to report genuine concerns or grievances and receive feedback on any action taken on the concerning issues.

The Vigil Mechanism shall provide for adequate safeguards against victimization of persons who use such mechanism and make provision for direct access to the Director nominated by the Board of Director (the Board).

OBJECTIVES

A Vigil Mechanism provides a channel to the employees and Directors to report to the management concerns about the malpractices and events which have taken place/ suspected to take place involving concerns about unethical behavior, actual or suspected fraud, manipulations, financial irregularities, violation of code of conduct, laws/

regulations and other matters or activity on account of which the interest of the Company is affected.

This mechanism neither releases employees from their duty of confidentiality in the course of their work nor can it be used as a route for raising malicious or unfounded allegations against people in authority and / or colleagues in general.

SCOPE OF THE POLICY

This Policy covers malpractices and events which have taken place / suspected to have taken place, misuse or abuse of authority, fraud or suspected fraud, violation of company rules, manipulations, misappropriation of funds, and other matters or activity on account of which the interest of the Company is affected.

RECEIPT AND DISPOSAL OF COMPLAINTS

Complaints should be reported in writing duly signed by the complainant as soon as possible after becoming aware of the same so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English or in Hindi. The complainant shall write his/her name and address on the complaint.

All Complaints should be addressed to the Director nominated by the Board ("hereinafter referred to as **"Nominated Director"**).

As on the date of the approval of the policy, the Company is under Corporate Insolvency Resolution Process (CIRP) and the Reserve Bank of India via press release dated January 27, 2025, has superseded the Board of Directors of the Company and appointed administrator in the Company.

Therefore, all the power of the Board shall be exercised by the Administrator.

The contact details of the Administrator is as under:-

Name - Mr Ram Kumar, Administrator/ Resolution Professional

Email Id- ram.kumar@aviom.in

On receipt of the Complaint, the nominated Director shall make a record of the Complaint for further appropriate investigation and needful action. The nominated Director, if deemed fit may call for further information or particulars from the complainant. All Complaints under this policy will be recorded and thoroughly investigated.

DECISION AND REPORTING

The Nominated Director along with its recommendations will report its findings to the Board within 15 days for further action as deemed fit.

A complainant who makes false allegations of unethical & improper practices or about wrongful conduct of the Subject (a person or group of persons against or in relation to whom a complaint is made or evidence gathered during the course of an investigation) to the Nominated Director shall be subject to appropriate disciplinary action in accordance with the rules, procedures and policies of the Company.

SECRECY / CONFIDENTIALITY

The complainant, Nominated Director, the Subject and everybody involved in the process shall maintain confidentiality of all matters under this Policy and discuss only to the extent or with those persons as required under this policy for completing the process of investigations.

PROTECTION

No unfair treatment will be meted out to a whistle blower by virtue of his/ her having reported a Complaint under this policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers. The identity of the Whistle Blower shall be kept confidential to the extent possible. Any other Employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.

RETENTION OF DOCUMENTS

All Complaints documented along with the results of Investigation relating thereto, shall be retained for a period of 5 (five) years from the date of the decision of the Board in specific matters.

ADMINISTRATION AND REVIEW OF THE POLICY

The Board shall be responsible for the administration, interpretation, application and review of this policy from time to time.

ANNUAL AFFIRMATION

The Company shall annually affirm that it has adopted a vigil mechanism which shall also form part of Board report.