



Whistle blower Policy

My Home Constructions Private Limited (MHCPL) is committed to upholding the highest standards of **integrity, transparency, and accountability** in all its business practices.

This Whistle blower Policy, in alignment with the Vigilance Policy (dated 04.01.2024) and Vigilance Procedures (dated 01/01/24 & 07/02/24), provides a secure mechanism for employees, contractors, vendors, suppliers, and other stakeholders to raise genuine concerns regarding unethical, illegal, fraudulent, or improper activities.

1. Introduction

This Whistleblowing Policy is established to guide the reporting of suspected unethical, illegal, or fraudulent activities by employees, contractors, vendors, suppliers, or others associated with My Home Constructions Private Limited ("MHCPL"), without fear of retaliation. MHCPL is committed to maintaining the highest ethical standards, transparency, and accountability, and encourages all stakeholders who identify improper conduct to report such matters through designated channels within the organization.

2. Purpose

This Whistleblowing Policy promotes a positive and ethical workplace culture by enabling individuals to voice concerns and address issues freely, thereby enhancing trust, morale, and accountability across the organization. The policy encourages employees, contractors, vendors, suppliers, or others associated with My Home Constructions Private Limited to report suspected unethical, illegal, or fraudulent activities without fear of reprisal. It also establishes a clear process for investigating such reports, ensuring that MHCPL can promptly identify issues and take corrective or disciplinary actions where necessary. Overall, this policy is an essential tool to foster an ethical and transparent culture, detect and prevent misconduct, safeguard the Company's reputation, and protect the interests of all stakeholders.

3. Scope

This Whistleblowing Policy covers suspected unethical, illegal, or fraudulent activities by employees, contractors, vendors, suppliers, or others associated with My Home Constructions Private Limited. The scope includes, but is not limited to:

- Accounting and financial irregularities.
- Corruption, bribery, and misuse of resources.
- Health, safety, and environmental violations.
- Human resources-related misconduct.
- Breach of confidentiality, data privacy, or information security.
- Non-compliance with laws, regulations, or the Company's Code of Conduct.

The policy applies to all business operations and facilities of MHCPL, wherever it operates. Reports may be made anonymously, provided the information is specific, credible, and



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sufficient to allow investigation. The purpose of this scope is to encourage genuine reporting of misconduct and ensure timely and appropriate action to address such issues.

4. Reporting Mechanism

Whistle blowers may report concerns through the following channels:

- Email: mhcvigilance@myhomeconstructions.com
- Helpline Number: +91- 9100999200
- Drop Box: Installed at designated company premises.
- In-person: Project Heads/Head – Vigilance / Vigilance Officer
- Digital portal for reporting : <http://mhcphp.myhomeconstructions.com:8084/suggestion/>

Reports may be made **anonymously** or with full disclosure. Specific details (date, time, persons, evidence) are encouraged to enable effective investigation.

5. Investigation Process

- Complaints will be formally registered in the **Vigilance Complaint Register**.
- The Head – Vigilance will review each complaint for specificity, credibility, and supporting evidence.
- Preliminary assessment will determine whether a detailed investigation is warranted.
- An **Enquiry Officer** may be appointed to conduct fact-finding and submit reports.
- Investigations will be completed within defined timelines (preliminary within 2 weeks, final within 1 month, extendable with EVC's approval).
- Reports and recommendations will be submitted to the **Executive Vice Chairman (EVC)** or the authority prescribed time to time for final decision.
- Actions may include recovery, suspension, termination, contract blacklisting, or escalation to law enforcement authorities.

6. Rights & Obligations.

Whistle blower (Informer):

- Report genuine concerns in good faith.
- Provide sufficient information and evidence.
- Support the investigation if required.

Accused:

- Cooperate fully with investigations.
- Provide relevant information and evidence.
- Refrain from influencing witnesses, tampering with evidence, or obstructing the enquiry.



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7. Protection & Confidentiality

- Whistle blowers acting in good faith will be protected from retaliation, harassment, suspension, demotion, or discrimination.
- Identity of the whistle blower and accused will be kept confidential, disclosed only on a need-to-know basis or as required by law.
- Head Vigilance and Enquiry Officers will act independently, free from internal or external influence.

8. False or Malicious Complaints

- Frivolous, mala fide, or knowingly false complaints are strictly prohibited.
- Such misuse will attract disciplinary action, including termination, blacklisting, or legal proceedings under applicable law.

9. Compliance with Laws

This policy is framed in accordance with the sprits of following laws even after being a Private Company:

- Section 177 of the **Companies Act, 2013**.
- The **Whistle Blowers Protection Act, 2014**.
- **Prevention of Corruption Act, 1988 (as amended)**.
- Other applicable Indian laws and corporate governance guidelines.

10. Review & Amendment

MHCPL reserves the right to review & amend or modify this policy from time to time to reflect evolving business needs, regulatory requirements, and best practices.