

Whistleblower Policy

ARIHANT FOUNDATIONS & HOUSING LIMITED

Introduction

Arihant Foundations & Housing Limited is committed to maintaining the highest standards of corporate governance, ethical integrity, and regulatory compliance. To reinforce transparency and accountability, this **Whistleblower Policy** establishes a mechanism for employees, stakeholders, and third parties to report violations without fear of retaliation. The purpose of this policy is to provide a structured approach to reporting concerns, ensuring confidentiality, protection, and fair resolution of complaints.

Purpose and Scope

This policy applies to all employees, directors, suppliers, contractors, investors, and external stakeholders of **Arihant Foundations & Housing Limited**. It is designed to:

1. Encourage **ethical conduct and accountability** in business operations.
2. Protect individuals who report misconduct **in good faith**.
3. Establish an **independent investigation process** overseen by the Audit Committee.
4. Ensure compliance with **SEBI regulations and the Companies Act, 2013**.

Regulatory Compliance

This policy is formulated in compliance with:

- **Section 177(9) & (10) of the Companies Act, 2013**
- **Regulation 22 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**
- **SEBI (Prohibition of Insider Trading) Regulations, 2015**
- **SEBI (Fraudulent and Unfair Trade Practices) Regulations, 2003**

4. Protected Disclosures

Whistleblowers may report issues related to:

- **Fraud** or financial misconduct
- **Violation of laws, regulations, or company policies**
- **Bribery or corruption**

- **Harassment or discrimination**
- **Insider trading or market manipulation**
- **Mis-selling or misrepresentation to investors**
- **Unauthorized trading or facilitation of mule accounts**
- **Environmental and safety concerns.**

Definitions Whistleblower

A **whistleblower** refers to any employee, director, supplier, contractor, or stakeholder who reports concerns about unethical practices, fraud, or regulatory violations.

Audit Committee

“Audit Committee” means the Audit Committee constituted by the Board of Directors of the Company in accordance with Regulation 18 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (‘Listing Regulations’) and Section 177 of the Companies Act, 2013 read with the rules made thereunder, as amended from time to time.

Protected Disclosure

A **protected disclosure** is a complaint made in good faith regarding fraud, bribery, insider trading, financial mismanagement, workplace harassment, or regulatory violations.

Investigators

Investigators may include **internal compliance officers, external auditors, or legal advisors** assigned by the Audit Committee to evaluate whistleblower complaints objectively.

Retaliation

Retaliation refers to any negative action—including termination, demotion, harassment, or discrimination—against a whistleblower due to reporting misconduct.

Subject Employees

Subject employees refer to individuals within the company who are either:

1. **Accused of misconduct** or violations under the whistleblower complaint.
2. **Directly or indirectly involved** in the reported issue or investigation.
3. **Responsible for governance, compliance, or management roles** that oversee ethical conduct within the organization.

Rights and Duties of Subject Employees Rights of Subject Employees

Subject employees involved in a whistleblower case have the following rights:

1. **Right to Fair Investigation** – They shall not be presumed guilty, and all allegations must be investigated with due process.
2. **Right to Confidentiality** – Their identity and involvement in the case shall remain confidential until legally required disclosure.
3. **Right to Respond** – They shall have the opportunity to present their side of the case, including supporting documents or witness statements.
4. **Right to Protection from False Allegations** – If proven innocent, they shall not face discrimination or damage to their reputation due to unsubstantiated claims.
5. **Right to Legal Assistance** – If the allegation involves regulatory authorities, they may request legal support through the company.

Duties of Subject Employees

All employees under investigation or involved in whistleblower cases have the following obligations:

1. **Duty to Cooperate** – They must comply fully with requests for documents, interviews, and investigation procedures.
2. **Duty to Maintain Confidentiality** – They must not disclose details of the investigation to unauthorized parties.
3. **Duty to Provide Truthful Information** – They must respond honestly and transparently without withholding or manipulating evidence.
4. **Duty to Refrain from Retaliation** – Subject employees must not engage in retaliation, intimidation, or influencing the investigation.
5. **Duty to Implement Corrective Actions** – If found in violation, they must adhere to disciplinary measures or recommended policy changes.

Reporting Mechanisms How to Report a Concern

Whistleblowers can submit complaints through the following **confidential manner**.

Written submission: Sealed envelope marked “Confidential” addressed to the:

Audit Committee Chairperson.

The Chairman Audit Committee

ARIHANT FOUNDATIONS & HOUSING LIMITED

No. 3, Ganapathy Colony, 3rd lane, off. Cenotaph road, Teynampet, Chennai 600 018.

Investigation & Resolution Process

Investigators & Their Roles

Upon receiving a whistleblower report, the Ethics Committee will appoint independent investigators, which may include:

- Internal compliance officers for preliminary review.
- External auditors or legal advisors for complex cases.
- Regulatory experts if financial, legal, or corporate laws are implicated.

Role of the Audit Committee & Investigators

Upon receiving a report, the **Audit Committee** will:

1. **Acknowledge receipt** within **7 business days**.
2. Conduct a **preliminary screening** to assess validity within **10 days**.
3. Assign **independent investigators** for formal review.
4. Gather **evidence, interview witnesses, and analyze relevant documents**.
5. Provide **recommendations for corrective action** within **30 business days**.
6. Escalate cases to **SEBI or legal authorities** if necessary.

Resolution & Corrective Measures

Based on investigation findings, the company may:

- **Initiate disciplinary action** against responsible individuals.
- **Implement procedural reforms** to prevent recurrence.
- **Report violations to regulatory authorities** if required.

Protection Against Retaliation

Arihant Foundations & Housing Limited ensures **strict protection** against retaliation for whistleblowers. This includes:

1. **Employment Security** – Whistleblowers shall not face dismissal or discrimination.
2. **Confidentiality Guarantee** – Identity will remain protected unless legally mandated

disclosure is required.

3. **Legal Assistance** – Whistleblowers may seek legal support if facing retaliation.
4. **Alternative Roles** – Employees experiencing workplace harassment after reporting may request reassignment.
5. **Strict Disciplinary Action** – Retaliation will result in severe consequences against responsible individuals.

Retention of Documents & Reports

All whistleblower complaints, investigations, and outcomes shall be securely retained for a **minimum of five years** in compliance with SEBI regulations.

Amendment & Policy Review

This policy shall be **reviewed annually** for compliance with evolving **SEBI regulations and corporate governance standards**. Any **modifications or major amendments** must be approved by the **Board of Directors**.
