

# The Hindustan Housing Company Ltd.

## VIGIL MECHANISM

- This Vigil Mechanism has been established by the Company pursuant to the provisions of Section 177(9) of the Companies Act, 2013 and approved by Board of Directors of the Company at its meeting held on 5<sup>th</sup> February, 2015.
- Many times a violation does not affect an individual directly, but it is detrimental to the organisation's interest. Individuals hesitate to report such violations out of fear or indifference. Vigil Mechanism provides a mechanism for an individual to report violations without fear of victimisation.
- When the director/employee sees violations of integrity norms, they may not be directly aggrieved, but they may have information that organisational interests are being compromised. This may be unethical behaviour, suspected or actual fraud, violation of the code of conduct etc.
- Some examples are persons taking bribes, confidential information being leaked out, misuse of company's resources, favours shown or demanded from business associates/partners, violation of statutory requirements, etc.
- Before reporting such events, the director/employee has to ascertain that a violation has actually occurred and that the act is not based on what can be termed as a normal business decision.
- In all such cases, the director/employee will address the complaint to any member of the Enforcement Committee along with the available details and evidence to the extent possible. In case, the complaint is received by a person, other than a member of Enforcement Committee, the same will then be forwarded by him/her to the Enforcement Committee.
- As a rule, anonymous complaints will not be entertained. The identity of the complainant will be protected and will be known only to the Enforcement Committee.
- The Enforcement Committee may meet the complainant, if necessary. They may also appoint any suitable person or group of persons to investigate the case, but will ensure that the identity of the complainant is protected.
- In appropriate and exceptional cases, the complainant shall have direct access to the Chairperson of the Audit Committee.

- The Enforcement Committee will decide the case and recommend action within four weeks to the Chairman. The final action to be taken will be decided by the Chairman.

**Enforcement Committee will consist of:**

- 1) Mrs. Minal Bajaj (Director)
  - 2) Mrs. Meeta Khalsa (Company Secretary)
  - 3) Mr. Vijay Bohra (Chief Financial Officer)
- Mrs. Minal Bajaj (Director) will be the Chairperson of the Enforcement Committee.
  - Any grievance against any member of the Enforcement Committee should be addressed to the Chairman.

For The Hindustan Housing Company Ltd.

Director