Centrum Housing Finance Limited

Whistle-blower Policy

Document Title	**Whistle-blower Policy**
Approved by	**Board of Directors at its meeting held on 24th May, 2017**
Date of latest release	**4th February, 2026**

Preface

The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior. The Company has adopted the Code of Business Conduct and Ethics, which lays down the principles and standards that should govern the actions of the Company and its employees.

Objective

The Company is committed to follow to the highest ideals of ethical, moral and legal conduct of business operations. To maintain these standards, the Company reassures its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of retaliation or adverse employment action. This policy aims to provide an opportunity for employees to raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports, etc.

Scope

Under the mentioned policy various stakeholders are eligible to make “Protected Disclosures." These stakeholders may be broadly categorized as follows:

- Directors of the Company
- Permanent, Part-time, and Contractual employees of the Company
- Employees of other agencies deployed for the Company’s activities, whether working from any of the Company’s offices or any other location
- Contractors, vendors, suppliers or agencies
- Customers of the Company

Policy

The Whistleblower policy intends to provide a medium to voice serious concerns that could have grave impact on the operations and performance of the business of the Company and also endeavours to comply with the provisions of the SEBI Prohibition of Insider Trading Regulations, 2015 for which an employee trading policy has been formulated.

It covers spectrum of malpractices, misuse of powers, frauds or suspected frauds, suspected disclosure of unpublished price sensitive information etc., on account of which interest of the Company and its stakeholders are generally affected. The Policy covers mismanagements and events which have taken place/ suspected to take place involving:

- Exploitation of authority
- Breach of contract
- Manipulation / Mismanagement of company data/records
- Financial irregularities, including fraud or suspected fraud in preparations of Financial Statements or Misrepresentation of financial reports
- Illegal act whether Criminal/ Civil

- Pilferage of confidential/proprietary information
- Wastage/misappropriation of company funds/assets
- Breach of Code of Conduct
- Unpublished price sensitive information

But this policy cannot in anyway be used as a defence for raising foul and false allegations against the management and co-workers. Management will not tolerate any such attempts and reserve its rights to take appropriate action, if needed.

Guiding Principles

To ensure that this policy is followed, and to assure that the concern will be acted upon seriously, the Company will:

- Ensure that the whistle-blower and/or the person processing the protected disclosure is not victimized for doing so
- Ensure complete privacy
- Not attempt to conceal evidence of the protected disclosure
- Take disciplinary action, if any one destroys or conceals evidence of the protected disclosure made/to be made

Procedure for Reporting & Dealing with Disclosures

- Reporting

The whistle blowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct of management or any employee concerns, suspected disclosure of price sensitive information should be reported directly to:

Chairperson, Audit Committee
Centrum Housing Finance Limited
801, Centrum House, CST Road
Vidyanagri Marg, Kalina
Santacruz E, Mumbai – 400098

or through the web-based reporting platform to report such violations on the Company's website. Each concern lodged, will be forwarded to the Chairperson of the Audit Committee via an email. The identity of all whistle blowers accessing the said portal will be kept confidential, unless the complainant has no reservations in disclosing the same.

- Timing

The earlier a concern is expressed, the easier it is to take action. The efforts will be to complete the investigation process by a month, subject to receipt of proper cooperation from all concerned.

- Evidence

The Protected Disclosure should provide the names of the subject and contain specific details and factual information to support the act(s) of wrong-doing or breaches. The onus of proving the allegations will be on the person raising the issues. Written evidence will be preferred. In case the Protected Disclosure is communicated in electronic mode, the same should be forwarded with the subject as "Protected disclosure under the Whistle Blower Policy".

- How the Complaint will be handled

The Audit Committee of the Board will oversee the vigil mechanism. If any of the members of the Committee have a conflict of interest in a given case, they should recuse themselves and the others on the Committee would deal with the matter on hand. The decision of the Audit Committee shall be final.

- Initial Inquiries

At the discretion of the Audit Committee, initial inquiries may be made to ascertain whether an investigation requires to be made. After completion of enquiry, a detailed report to be prepared. Some concerns may be resolved by agreed action without the need for investigation.

- Report to Complainant

The complainants will be given the opportunity to receive a report on their concern in two weeks. The report may inter alia contain:

  - Acknowledgement that the concern was received;
  - Manner in which matter will be dealt with;
  - An estimated time for a final response;
  - Intimation regarding initial inquiries, if any;
  - Any further investigation, if further needed.

- Further Information

Depending upon requirement, further information may be sought from the complainant.

- Information

Subject to legal constraints the complainant will receive information about the outcome of any investigations.

The Company affirms that no officials of the Company will be denied access to the Audit Committee and Chairperson of the Audit Committee.

The Board of Directors reserves its right to modify or amend this policy at its sole discretion at any time as it may deem necessary.

Document Retention

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company as per the applicable law.