

Ashiana Housing Limited**Vigil Mechanism**

Originally adopted by the Board of Directors on 30th May 2014 and amended by the Board of Directors on 11th August 2026

1. The directors and employees of the Company, across all the branches, have the right to report, whether in writing or by email (vishal@ashianahousing.com), their genuine concerns and grievances, including unethical behaviour, actual or suspected fraud or violation of the Company's code of conduct or ethics policy, any suspected violation of any law that applies to the Company including possible accounting or financial reporting violations, insider trading, leak of unpublished price sensitive information, bribery, directly to Mr. Vishal Gupta - Managing Director of the Company.

Other stakeholders including past employees (person other than the above category) can also anonymously report any instances of financial irregularities, breach of code of conduct, abuse of authority, disclosure of financial/ unpublished price sensitive information other than for legitimate purposes, unethical/unfair actions concerning Company vendors/suppliers, malafide manipulation of Company records, directly to Mr. Vishal Gupta - Managing Director of the Company.

2. However, in exceptional cases, the directors, employees of the Company, or any other aggrieved person including past employees (other complainant) may directly report to the Chairperson of the Audit Committee, presently Mr. Narayan Anand, at narayan_anand63@yahoo.com and in the absence of such Chairperson then directly to Mr. Varun Gupta - Whole Time Director of the Company also one of the members of the Audit Committee at varun.gupta@ashianahousing.com.
3. The onus of proving that the matter proposed to be reported falls in the category of exceptional cases, in clause (2), will be on such Director or employee or other complainant.
4. The directors or employees or other complainant who report or avail the vigil mechanism, as above, shall not become subject of victimization.
5. The Audit Committee of the Company shall oversee the vigil mechanism and in case any members of the committee have a conflict of interest in any given/ reported case then the remaining members who do not have any such conflict interest shall oversee the vigil mechanism.
6. In case of repeated frivolous complaints filed by a director or an employee or other complainant, the Audit Committee may take suitable action against the complainant.

For ASHIANA HOUSING LIMITED



VISHAL GUPTA
Managing Director