CAPRI GLOBAL HOUSING FINANCE LIMITED

Whistle Blower Policy
(Approved by Board at its meeting held on October 22, 2026)

CAPRI GLOBAL HOUSING FINANCE LIMITED
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1.0 Whistle Blower Policy

The Company believes in the conduct of the affairs of its various constituents in a fair and transparent manner, by adopting the highest standards of professionalism, honesty, integrity and ethical behavior and open communication.

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 stipulates a mandatory requirement for the Listed Companies to set up whistle blower / vigil mechanism for all its Stakeholders.

Accordingly, the Whistle Blower Policy ("the Policy") has been formulated with a view to provide a mechanism for associates of the Company to approach the Whistle Committee or Chairman of the Audit Committee of the Company to, inter alia, report to the management, instances of unethical behavior, actual or suspected, fraud or violation of the Company's code of conduct or policy.

1.1 Objective

- To establish a mechanism for employees to report to the management instances of unethical behavior, actual or suspected fraud or violation of the Company's code of conduct or ethics policy.

- To provide a framework to promote responsible and secure whistle blowing. It protects employees wishing to raise a concern about serious irregularities within the Company.

- To provide necessary safeguards for protection to employees from reprisals or victimization, for whistle blowing in good faith.

The Policy neither releases an employee from their duty of confidentiality, in the course of their work, nor is it a route for taking up a grievance about a personal situation.

1.2 Definitions

The definitions of some of the key terms used in this Policy are given below:

(a). **"Whistle Blower Committee"** means the Committee of persons which is nominated / appointed to conduct detailed investigation.

(b). **"Employee"** means any employee of CGHFL, including the Directors who are in whole timeemployment.

(c). **"Whistle Blower"** means an Employee raising a Protected Disclosure under this Policy.

(d). **"Subject"** means a person against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.

(e). **"Protected Disclosure"** means any concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

(f). **"Code"** means the Code of Conduct.

(g). **"Employee Policy Handbook"** means CGHFL employee code of conduct handbook.

(h). **"Disciplinary Action"** means any action that can be taken on the completion of / during the investigation proceedings, including but not limiting to a warning, imposition of fine, suspension from official duties, or any such action as is deemed to be fit considering the gravity of the matter.

(i). **"CGHFL" / "the Company"** specifically for the purpose of this Policy shall mean Capri Global Housing Finance Limited and all its subsidiaries whether incorporated in or abroad.

(j). **"Act"** means the Companies Act, 2013 r/w relevant rules, as amended from time to time.

(k). **"Audit Committee"** means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Act and Regulation 18 of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015.

(l). **"Board"** means the Board of Directors of the Company.

(m). **"Company"** means Capri Global Housing Finance Limited and its subsidiaries and associates.

(n). "Director" means all the directors of the Company.

(o). "Fraud" in relation to affairs of a company or a body corporate, includes any act, omission, concealment of any fact or abuse of position committed by any person or any other person with the connivance in any manner, with intent to deceive, to gain undue advantage from, or to injure the interests of, the Company or its creditors or any other person, whether or not there is any wrongful gain or wrongful loss.

1.3 Scope

This Policy is an extension of the Code of Conduct and Employee Policy Handbook. The role of a Whistle Blower is to bring to the notice of the appropriate authority any Protected Disclosure.

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

1. Ensure that the Whistle Blower and/or the person processing the Protected Disclosure is not victimized for doing so.
2. Treat victimization as a serious matter including initiating disciplinary action on such person/(s); ensure complete confidentiality.
3. Not attempt to conceal evidence of the Protected Disclosure.

4. Take disciplinary action, if anyone destroys or conceals evidence of the Protected Disclosure made/to be made;
5. Provide an opportunity of being heard to the persons involved especially to the Subject.
6. Seeks to ensure that anyone who is aware of a breech of the company policies and procedures, suspected or actual frauds and embezzlement, illegal, unethical, behavior or violation of company's code of conduct or ethics etc., Feels free to bring this to the attention of appropriate personnel in the company, without fear of victimization, harassment or retaliation.

A Whistle Blower is not required or expected to act as investigator or finder of facts. A Whistle Blower is also not required or expected to determine or suggest the appropriate corrective or remedial action that may be warranted in a given case.

1.4 Eligibility

This policy is applicable to the following:
1. All the Directors of the Company
2. All Employees of the CGHFL and its respective affiliate/ group company as the case may be; and

All permanent employees of CGHFL are eligible to raise Protected Disclosure under the Policy. The Protected Disclosure raised should be in relation to matters concerning CGHFL only.

1.5 Types of Protected Disclosures

The Whistle Blower Policy is intended to cover malpractices and events which have taken place/ suspected to take place involving the following:

- May lead to incorrect financial reporting,
- Leakage of confidential information,
- Are not in line with applicable CGHFL Group Policy,
- Are unlawful,
- Are fraud, relates to financial irregularity or forgery of documents,
- Pertains to corruption, theft, bribery, or blackmail,
- Sexual harassment,
- Other criminal offences,
- Corruption and bribery,
- Insider trading,
- Leak of Unpublished Price Sensitive Information,
- Kickbacks,
- Miscarriage of justice,
- Endangering the health or safety of any individual,

- Endangering the environment,
- Any violations to the Company's ethical business practices as specified in CGHFL' Code of Conduct Policy,
- Concealing any of the above,
- Otherwise amount to serious improper conduct, or
- Any other unethical, biased, favoured, imprudent event which would affect the interest of CGHFL
- The above list of only illustrative and should not be considered as exhaustive
- This Policy should not be used in place of the company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues.

Employees are advised to report Protected Disclosure in writing, as soon as possible or preferably within 30 consecutive days after becoming aware of existence of some fraudulent / illegal activity. However, if the employee is not able to report the same for any reason within 30 days, s/he has a choice of reporting the incident at a later date as well.

An employee may raise a protected disclosure by sending an email to **whistle.blower@caprihomeloans.com**

If initial enquiries by the Committee indicate that the concern has no basis, or it is not a matter to be investigated or pursued under this Policy, it may be dismissed at this stage and the decision is documented and a note to this effect be circulated to Audit Committee for their information. Where initial enquiries indicate that further investigation is necessary, this will be carried through the Whistle Blower Committee. The investigation would be conducted in a fair manner, as a neutral fact-finding process and without presumption of guilt.

Relevant authorities and its powers to review disclosures and direct corrective action relating to such disclosures.

1.6 Committee

A Committee titled "Whistle Blower Committee" has been constituted to investigate into serious concerns raised by an employee. The functioning of the Committee shall be overseen by the Audit committee. The Committee in its present form comprises of the following persons:

1. President & Executive Director - Business Strategy
2. Chief Risk Officer
3. Chief Compliance Officer
4. Chief Human Resources Officer
5. Head – Legal
6. Head – Human Resources

7. Head – Investigation & Vigilance

To carry out the investigation, any 3 active Committee Members will form the quorum of the Committee and Director Strategy, being mandatory.

1.7 Disqualifications

- While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action as laid down in the Employee Policy Handbook.

- Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a *mala fide* intention.

- Whistle Blowers, who make any Protected Disclosure, which have been subsequently found to be *mala fide* or malicious, or Whistle Blowers who make more than 3 consecutive Protected Disclosures, which have been subsequently found to be frivolous, baseless or reported otherwise than in good faith, will be severely reprimanded and also will be disqualified from reporting further Protected Disclosures under this Policy for a period of oneyear from the date of such last disclosure.

1.8 Retention of documents

All Protected Disclosures in writing are documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of seven years.

1.9 Investigation Process

- The 'Employee' may choose to articulate details of the Protected Disclosure to the Committee in writing to the Committee. The Members of the Whistle Blower Committee shall keep the identity of Whistle Blower secret. It is being assured that there won't be any victimization of the whistle blower.
- The employee has to write to **whistle.blower@caprihomeloans.com** to submit his/her protected disclosure.
- In the case where the complaint is against one of the Committee Member, the complaint should be addressed to the Head – Culture & Talent Management of the Company or any Committee Member against whom the complaint is not directed at.
- If any of the Members of the Committee have a conflict of interest in a given case, the Committee Member should rescue themselves and others from the committee would deal with the matter at hand.

- On receipt of the disclosure, the Committee will look into it, to assess initially what action should be taken, depending on the merit of the case.
- The employee must inform the Committee at the outset in case there are any personal interests involved as the Committee may deem it necessary to interview the employee, to obtain as much information as possible about the grounds for employee's belief of Protected Disclosure.
- In case the Committee finds merit in the Protected Disclosure raised, it would proceedfurther in the investigation. The concerned person/s will be given an opportunity to present their views to the Committee.
- After examination of the complaint, the Committee will initiate action as appropriate depending on the seriousness of the concern and action.
- The disciplinary action would be in accordance with the policy laid down in the Employee Manual. If the action amounts to an offence under the Indian Penal Code, then CGHFL will initiate criminal proceedings, if necessary.
- A detailed written report of the Protected Disclosure would be made. The record will include:

  a) Facts of the matter.
  b) Whether the same Protected Disclosure was raised previously by anyone, and if so, the outcome thereof.
  c) Whether any Protected Disclosure was raised previously against the same Subject.
  d) The financial/ otherwise loss which has been incurred / would have been incurred by the Company.
  e) Findings of Whistle Blower Committee.
  f) The recommendations of the Committee on disciplinary/other action/(s).

- The Whistle Blower Committee shall finalise and submit the report to the Audit Committee within 15 days of investigation.
- In case the Protected Disclosure is proved, the Whistle Blower Committee can and take disciplinary action as they may think fit and take preventive measures to avoid reoccurrence of the matter.

  i) In case the Protected Disclosure is not proved, extinguish the matter.

  Or

  ii) Depending upon the seriousness of the matter, Whistle Blower Committee may refer the matter to the Audit Committee for necessary action with its proposal. In case the Audit Committee thinks that the matter is too serious, it can further place the matter before the Board with its recommendations. The Board may decide the matter as it deems fit.

- In exceptional cases, where the Whistle Blower is not satisfied with the outcome of the investigation and the decision, s/he can make a direct appeal to the Chairman of the Audit Committee.

1.10 Protection

No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blower. Complete protection will, therefore, be given to Whistle Bloweragainst any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behavior or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/functions including makingfurther Protected Disclosure. The Company will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure. Thus, if the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower to receive advice about the procedure, etc.

a. The Whistle Blower would, however, be required to disclose his/her identity and furnish sufficient information for verifying his/her identity. The identity of the Whistle Blower shall be kept confidentially.
b. Any other Employee assisting in the said investigation or furnishing evidence shall also be protected to the same extent as the Whistle Blower.

1.11 Confidentiality

The Whistle Blower, the Subject, the Committee Members, and everyone involved in the process shall:

a. maintain complete confidentiality/ secrecy of the matter.
b. not discuss the matter in any informal/social gatherings/ meetings.
c. discuss only to the extent or with the persons required for the purpose of completing the process and investigations.
d. not keep the papers unattended anywhere at any time,
e. keep the electronic mails/files under password.

If anyone is found not complying with the above, s/he shall be held liable for disciplinary action as considered fit by the Company.

1.12 Reporting

A quarterly report with number & type of complaints received under the Policy and their outcome shall be placed before the Audit Committee.

1.13 Amendments to the Policy

In case of any subsequent changes in the provisions of the Companies Act or any other regulations, including the listing regulations, which makes any of the provisions in the Policy inconsistent with the Companies Act or such other regulations, such provisions of the Companies Act or such other regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

This Policy shall be reviewed by the Board. Any changes or modification on the Policy would be presented for approval of the Board. The Board authorize Managing Director to make changes in the Policy due to regulatory or legal requirement and such changes made to be brought to the attention of the Board at the first meeting following the amendment.