EXCERPTS OF WHISTLE BLOWER POLICY

Hemdev Corporate Services Private Limited (Company) has established its Whistle Blower Policy (the Policy) for employees so that they can raise concerns/issues, if any, which they have on the following or possibilities/apprehensions of:

· Breach of any law, statute or regulation by the Company;

· Issues related to accounting policies and procedures adopted for any area or item.

· Acts resulting in financial loss or loss of reputation.

· Misuse of office, suspected/actual fraud and criminal offences.

ADMINISTRATION OF THE POLICY:

The employee may send a communication directly in writing through a letter to the Chairperson, Audit Committee of the Company or the Chief Compliance Officer and Head – Legal, Hemdev Corporate Services Private Limited, 121, Veena Beena Shpg Ctr, Guru Nanak Rd, Bandra West, Mumbai - 400050. An employee may also send a communication through an e-mail addressed to queries+whistleblower@hemdev.in or record a concern in the Whistle Blower Case Management System.

which can be accessed on Universe > Quick Links > Whistle Blower Policy> Click here to read whistleblower policy of Hemdev Corporate Services Private.

The Chief Compliance Officer and Head – Legal will get the concerns investigated and brief the audit committee on a quarterly basis. The Chief Compliance Officer and Head – Legal shall lay down various guidelines for implementation of the Policy including record keeping and dissemination of information about the Policy.

PROTECTION TO EMPLOYEES:

Any employee who makes a disclosure or raises a concern under the Policy will be protected, if the employee discloses his/her identity, discloses the information in good faith, believes it to be substantially true, does not act maliciously nor makes false allegations and does not seek any personal or financial gain.

The Company strictly prohibits any attempt of retaliation by anyone against any employee who raises a concern under the policy in good faith.

Any Employee who has been subject to victimization for use of this mechanism may communicate their concern by writing to the Chairperson, Audit Committee or the Chief Compliance Officer and Head – Legal of the Company.

Any infractions of the Code of Conduct of the Company by the complainant after raising the complaint may invalidate the protection provided under this Policy.

Nothing in this Policy precludes or is intended to preclude a complainant from seeking a monetary award from a government, administrative, or law enforcement authority, as provided for by law.