

RISHITA DEVELOPERS PRIVATE LIMITED

CIN: U45201UP2008PTC035945; Email: finance@rishitadevelopers.com
Registered Office: Coronation Anand Tower, 1st Floor, 116-117, Vibhuti Khand, Gomti Nagar, Lucknow - 226010;
Contact No:979200038; Website: <https://www.rishita.in/>

VIGIL MECHANISM POLICY

(As approved by the Board of Directors)

1. INTRODUCTION

This Vigil Mechanism is established in accordance with Section 177(9) of the Companies Act, 2013, and the applicable rules thereunder. Rishita Developers Private Limited (“the Company”) is committed to upholding high standards of integrity, transparency, and accountability. This Policy provides a structured mechanism for Directors, Employees, Vendors, and other Stakeholders to report genuine concerns about unethical behavior, actual or suspected fraud, or violations of the Company’s Code of Conduct.

2. OBJECTIVE

The objectives of this Policy are to:

- Safeguard Directors and Employees from victimization when reporting Protected Disclosures.
- Enable reporting of unethical behavior, fraud, or violations of the Code of Business Conduct and Ethics.
- Provide a secure channel to raise ethical, legal, or regulatory concerns.
- Ensure timely action while maintaining confidentiality.
- Protect the Reporting Person from retaliation.

3. DEFINITIONS

The following key terms are defined for clarity:

Company - Rishita Developers Private Limited.

Director - An appointed or elected member of the Board of Directors of the Company.

Employee - Any individual employed by the Company, including contractual employees, and their representative bodies.

Complaint – A written expression of an improper activity submitted by any Director or Employee of the Company in accordance with this Policy.

Investigators – Persons authorized, appointed, consulted, or approached by the Reporting Person or the Chairperson of the Company to investigate a Protected Disclosure.

Improper Activity – Any activity by an Employee or Director that violates any law or the Company’s Code of Conduct, including corruption, bribery, theft, misuse of Company property, fraudulent claims, actual or suspected fraud, or willful omission of duties.

Protected Disclosures – Bona fide written communications regarding an improper activity, made in good faith by a Director, Employee, or other Stakeholder. Disclosures should be factual, specific, and not speculative or interpretive.

Respondent / Respondents – Person(s) against whom a Protected Disclosure has been made or evidence gathered during an investigation.

Complainant– Any Employee, Director, or Stakeholder making a Protected Disclosure under this Policy.

Stakeholder – Includes vendors, suppliers, lenders, customers, business associates, trainees, and others engaged in financial or commercial dealings with the Company.

Vigilant Officer – Mr. Sudhir Kumar Agarwal, Director of the Company, shall serve as the Vigilant Officer under this Policy.

4. SCOPE

This Policy applies to any actual or suspected instances of:

- Abuse of authority
- Breach of contracts or agreements
- Manipulation or falsification of Company records/data

- Financial irregularities, including fraud, errors in financial statements, or deficiencies in internal controls
- Misappropriation or unauthorized disclosure of confidential/proprietary information
- Violation of applicable laws or regulations
- Breach of Company policies or the Code of Business Conduct

5. APPLICABILITY

This Policy is applicable to:

- All Directors and Employees of the Company
- Vendors, contractors, and other business associates connected with the Company

6. PROCEDURE FOR REPORTING

A Reporting Person may report concerns in writing or by email to the Vigilant Officer at:

To: Vigilant Officer

Rishita Developers Private Limited

Registered Office: First Floor, Coronation Anand Tower, 116-117, Vibhuti Khand, Gomti Nagar,
Lucknow - 226010

Email: cs@rishita.in

Complaint Details Should Include:

- Alleged unethical act
- Names of persons involved
- Evidence (if any)
- Contact details of the Reporting Person (optional for anonymous complaints)

Note: If the complaint involves the Vigilant Officer, it may be escalated directly to the Chairman of the Board.

7. INVESTIGATION AND ACTION

The Vigilant Officer will conduct a preliminary review and may appoint suitable persons to investigate.

Investigations will be conducted fairly, objectively, and confidentially.

Findings and recommendations will be submitted to the Board for appropriate action.

Disciplinary or corrective measures will be taken in accordance with Company policies if allegations are proven.

8. PROTECTION TO REPORTING PERSON

The identity of the Reporting Person shall be kept confidential.

No adverse action, harassment, or unfair treatment shall be taken against any Reporting Person raising a concern in good faith.

Retaliation against a Reporting Person will result in disciplinary action.

9. FALSE COMPLAINTS

Any person knowingly filing a false or malicious complaint will be subject to appropriate disciplinary action.

10. AMENDMENT AND REVIEW

This Policy may be amended or reviewed by the Board of Directors as deemed necessary to ensure continued compliance with applicable laws.

**For and on behalf of
Rishita Developers Private Limited**

**SD/-
Mr. Sudhir Kumar Agarwal(Director)
DIN: 01783755**

**SD/-
Ms. Lavee Agrawal(Director)
DIN: 01836581**