

WHISTLE BLOWER POLICY FOR THE BANK

BACKGROUND

As per Listing Agreement Clause 49, it was a non mandatory requirement to have a Whistle Blower Policy in an organisation. Accordingly, in our bank, it was observed that the bank has well defined systems and procedures and also a proper reporting system and therefore this mechanism was not introduced.

Though the bank is having a proper complaint handling system in place yet a scheme for public interest disclosure that ensures protection of informers is to be framed / implemented. As such, formation of a **Whistle Blower Policy would be a good step from the view of Corporate Governance.**

This **Whistle Blower Policy** is based on the Government of India Resolution on **"Public Interest Disclosures & Protection of Informer"** (PIDPI) in the Bank.

PREAMBLE

As a socially responsible organization, the Bank believes in conducting its affairs in a fair & transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behavior. The Bank is committed to develop a culture, where it is safe for all, who alarms concerns about any unacceptable/unethical practice or misconduct at any level.

As such, in case the complainant has reasonable grounds of having observed unethical and improper practices or any other wrongful conduct in any of the departments / offices / Branches of the Bank, he may lodge a complaint under this policy, which shall be known as **"Whistle Blower Policy"** in the Bank.

IMPORTANCE OF THE POLICY

The Government of India has authorized the Central Vigilance Commission (CVC) as the Designated Agency to receive written complaints for disclosure on an allegation of corruption or misuse of office and to recommend appropriate action. The jurisdiction of the Commission in this regard is extended to any corporation established by or under any Central Act. Our Bank, being established under the Central Act, therefore, comes under the purview of the Central Vigilance Commission.

In accordance with the aforesaid Resolution of the Government of India, the CVC, which will accept such complaints has the responsibility of keeping the identity of the complainant secret. As such, they have formulated norms for acceptance of complaints under the PIDPI. Bank is required to inform its employees, officers and general public, the laid down norms of the CVC in this regard and this policy is intended to provide for the same.

A copy of the detailed notification is also available on the website of the Commission <http://www.cvc.nic.in> issued in public interest by the Central Vigilance Commission, INA, Satarkata Bhawan, New Delhi.

MODALITY OF OPERATION AT THE BANK LEVEL:

The complainant shall lodge the complaint to the CVO in a closed / secured envelope marked as “**Complaint under the Public Interest Disclosure (PIDPI)**” at the following address:

The Chief Vigilance Officer
Punjab National Bank
Head Office: 7 Bhikaiji Cama Place
New Delhi 110 607

The CVO shall be authorized to deal with the complaints received under PIDPI. Complainant shall be known as “**Whistle Blower**” and the policy shall be known as “**Whistle Blower Policy**”. The confidentiality of whistle blower shall generally be maintained.

PROCEDURE FOR LODGING COMPLAINT UNDER WHISTLE BLOWER POLICY:

Any complaint which is to be made under PIDPI should comply with the following aspects:-

- i) Anonymous / pseudonymous complaints / reports shall not be entertained under this scheme.
- ii) The complaint /report should be sent in a secured manner by way of closed envelope to the Chief Vigilance Officer.
- iii) The envelope should be addressed to the officials as mentioned above and should be **superscribed “Complaint under The Public Interest Disclosure (PIDPI)”**. The complainant should only give his/her name and address either in the beginning of the text of the complaint or at the end of it.
- iv) If the complainant wants that his name should not be disclosed, the text of the complaint should be carefully drafted so as **not to give any details or clue as to his/her identity**. However, the details of the complaint should be specific and verifiable.
- v) If the envelope is not superscribed and closed, it will not be possible for the Bank to cover the identity of the complainant, thus his protection under the above resolution. Such complaints will be dealt with as per the normal complaint policy of the Bank.

OTHER ASPECTS:

i) In order to cover the identity of the complainant (whistle blower), the Bank will not issue any acknowledgement and the whistle-blower will also be advised that in case he intends to send reminder, he should follow the same procedure of correspondence as envisaged above.

ii) No adverse personnel action shall be taken or recommended against an employee (**Whistle Blower**) in retaliation to his lodging a complaint under this policy. However, he shall not be protected for his misconduct, which does not relate to the **disclosure made as a whistle blower**.

iii) An employee who knowingly makes false allegations of unethical & improper practices or alleged wrongful conduct shall be subject to disciplinary action and will not be protected under the policy.