

पंजाब नैशनल बैंक  
...भरोसे का प्रतीक !



punjab national bank  
...the name you can BANK upon!

# WHISTLE BLOWER POLICY

**Inspection & Audit Division,  
Head office, Dwarka  
New Delhi**

# **WHISTLE BLOWER POLICY FOR THE BANK**

## **1 BACKGROUND**

**1.1** Punjab National bank is committed to the highest standards of ethics & integrity. The bank encourages an open culture in all its dealings between staff, managers, customers and all people with whom it comes into contact.

**1.2** The company shall establish a vigil mechanism for directors and employees to report concerns about unethical behaviour, actual or suspected fraud or violation of the company's code of conduct or ethics policy.

**1.3** This mechanism should also provide for adequate safeguards against victimization of director(s) / employee(s) who avail of the mechanism and also provide for direct access to the Chairman, Audit Committee of Board. The details of establishment of such mechanism shall be disclosed by the Bank on its website and in the Board's report.

## **2 PREAMBLE**

Though the bank is having a proper complaint handling system in place yet a scheme for 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.**

Under the provisions of Companies Act & Guidelines issued by SEBI, the Whistle Blower Complaints are to be made to the Audit Committee, which includes direct access to the Chairman of the Audit Committee by the Whistle Blower.

## **3. IMPORTANCE OF THE POLICY**

**3.1** 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.

**3.2** 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.

#### **4. ELIGIBILITY:**

Any employee of the bank can lodge a complaint under Whistle Blower Policy.

Various stake holders of the bank are eligible to make Protected Disclosures under the policy. These stakeholders may fall into any of the following broad categories:

- (i) Employee of the bank
- (ii) Employees of other agencies deployed for the bank activities, whether working from any of the bank's offices or any other location.
- (iii) Contractors, vendors, suppliers or agencies (or any of their employee) providing any material or service to the Bank.
- (iv) Directors of the Bank

A person belonging to any of the above mentioned categories can avail of the channel provided by this Policy for raising an issue covered under this policy.

#### **5. SCOPE:**

**5.1** Staff member are to be encouraged as a preventive vigilance measures to report incidences of under-cover financial misconduct happening around the desk.

**5.2** The policy intends to help employees / persons who have major concerns over any wrong doing within the Bank to report unlawful conduct, misconduct, malpractices, violation of any legal or regulatory provisions, financial mismanagement, accounting irregularities etc.

**5.3** Through an exhaustive list of activities that constitute such misconduct/ malpractice / violations cannot be enumerated, it is expected that the following acts to be reported under this Policy:

- (i) Criminal offence (e.g. frauds, corruption or theft) committed / likely to be committed.
- (ii) Failure to comply with legal / regulatory provision
- (iii) KYC/AML violations to provide some undue advantage to anyone.
- (iv) Breach of client promises by the Bank
- (v) Bank funds used in an unauthorised manner
  
- (vi) Sexual or physical abuse of a member of staff, service recipient or service provider.

- (vii) Any other form of improper action or conduct
- (viii) Information relating to any of the above deliberately concealed or attempts being made to conceal the same
- (ix) Fraudulent activity in an account.

The bank has provided this policy so as to enable concerns about such wrong doing(s) raised at an early stage and in the right way.

## **6. WHISTLE BLOWER'S ROLE**

**6.1** The whistle Blower's role is that of a reporting party with reliable information. He/she is not required or expected to act as investigator or fact finder, nor would he/she determine that appropriate corrective or remedial action that may be warranted in a given case.

**6.2** Disclosure made under the policy will be appropriately dealt with by the Bank, and these will be reported to the Audit Committee of Board that will be the monitoring authority for the purpose of this policy.

## **7. WHISTLE BLOWER'S PROTECTION:**

**7.1** If one raises a concern under this policy, he/ she will not be at risk of suffering any form of reprisal or retaliation. Retaliation includes decimation, reprisal, harassment or vengeance in any manner. The bank will not tolerate the harassment or victimization of any one raising a genuine concern.

**7.2** The protection is available provided that:

- (i) The communication / disclosure is made in good faith
- (ii) She / he reasonably believes that information, and any allegation contained in it, are substantially true.
- (iii) She / he is not acting for personal gain.

**7.3** Bank will not disclose the identity, without her / his consent. If the situation arises where Bank is not able to resolve the concern without revealing the identity (for instance because her/ his evidence is needed in court), bank will discuss with her / him the matter in which bank propose to proceed, and within the confines of statutory requirements endeavour to meet her/ his preference on revealing the identity.

## 8. MODALITY OF OPERATION AT THE BANK LEVEL

The complainant shall lodge the complaint to the Chairman, Audit Committee of Board in a closed / secured envelope marked as “**Complaint under the provisions of Whistle Blower Policy**” at the following address:

The Chairman of Audit Committee of Board,  
Board & Coordination Division,  
Punjab National Bank  
Head Office, 5<sup>th</sup> Floor,  
Dwarka, New Delhi-110075

Alternatively the complaint can be lodged through email at [whistleblower@pnb.co.in](mailto:whistleblower@pnb.co.in).

The Chairman of Audit Committee of Board is authorized to deal with the complaints received under **provisions of Whistle Blower Policy**.

## 9. PROCEDURE FOR REPORTING

**9.1** Any complaint which is to be made under **provisions of Whistle Blower Policy** should comply with the following aspects:-

- i) The complaint /report should be sent in a secured manner by way of closed envelope to the Chairman, Audit Committee of Board.
- ii) The envelope should be addressed to the officials as mentioned above and should be superscribed “**Complaint under the provisions of Whistle Blower Policy**”. 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.
- iii) If the complainant wants that his/ her 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.
- iv) In order to have a speedy disposal of these complaints the complainant should submit complaint in a closed envelop **super scribed “Complaint under the provisions of Whistle Blower Policy”**. If the envelope is not super scribed and closed, it will not be possible for the Bank to cover the identity of the complainant.

**9.2** All the complaints received under this Policy will be opened in the presence of Chairman of the Audit Committee of Board, by an authorized official of Board & Coordination Division, designated in this regard by Chairman, ACB. Once, the Chairman, ACB decides that this complaint can be considered under the Whistle Blower Policy, the authorized official will enter it in a Corporate Register containing brief particular of the complaint received under this Policy. He / she shall assign a Unique Reference Number (URN) to each complaint. All inter-office correspondence in respect of complaints received under Whistle Blower Policy will be done citing only Unique Reference Number (URN) and not the name of Whistle Blower.

## **10. OTHER ASPECTS**

**10.1** Whistle-blower is advised that in case he intends to send reminder, he should follow the same procedure of correspondence as envisaged above.

**10.2** 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.

**10.3** All reports received in writing or documented, along with the result of investigation relating thereto, shall be retained by the Bank for period of seven years.

**10.4** The matters related to Appointments, Postings & Transfers etc. will not be normally entertained under Whistle Blower Policy. For these types of matters, complainant may use any other mechanism. However, if there is any serious issue involved in this type of complaint, the matter shall be brought into the notice of MD & CEO.