



PSB ALLIANCE PVT.LTD

WHISTLE BLOWER POLICY

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1. Objective

To ensure that PSB Alliance Pvt. Ltd. (hereinafter referred to as “the Company”) implements a Vigil mechanism (the Whistle Blower Policy) in letter and spirit by undertaking all necessary and reasonable steps to encourage and support the making of disclosures by employees who have observed any unethical practice or grave misconduct. It enables Employees and Directors about their duty to report any suspected violation of any law that applies to the Company and any suspected violation of Company’s Code of Conduct. This Whistle Blower Policy (‘the Policy’) provides a platform and mechanism for the Employees and the Directors to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.

2. Applicability

The Policy is applicable to all the employees and Directors of the Company.

3. Unethical practice or grave misconduct

An unethical practice or grave misconduct means a conduct which results in violation of rules of the Company or in a substantial mismanagement of the Company resources, and if proven, constitutes a criminal offence or reasonable grounds for dismissal of the person engaging in such conduct. It also includes any unethical practices or any questionable accounting/audit matters and fraudulent financial practices.

4. Reporting Procedure

It is the policy of the Company to encourage employees to inform the management of the Company about existence of any unethical practice or grave misconduct, past or present, and report such event. The unethical practice or grave misconduct can be reported to the MD & CEO. If it is against the MD & CEO, it can be reported to the Board of the Company. The manner of intimation can be either by email or by sending a letter.

5. Compliance Officer

The Chief Compliance and Risk Officer (CCRO) of the Company or an authorised official is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The CCRO will advise the MD & CEO and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Audit Committee on compliance activity relating to accounting or alleged financial improprieties.



In case of complaints received about the Accounting and Auditing matters the CCRO shall immediately notify the Audit Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Committee until the matter is resolved.

6. No Retaliation

It is contrary to the values of the Company for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the Company. An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary proceedings which may include termination of employment. If the employee feels that he has been subjected to discrimination, retaliation or harassment for having reported an unethical practice or grave misconduct under this policy, he/she must immediately report the fact to the MD & CEO or the Chairman, of the Company. All the complaints received under this Policy will be investigated within 30 days. If a complaint of discrimination, retaliation or harassment is substantiated, appropriate disciplinary action shall be taken.

7. Investigation

All complaints received under this policy will be promptly and thoroughly investigated. The Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reported events will be considered with all the seriousness it deserves and will be promptly and thoroughly investigated. The investigation report shall be submitted in 30 days from the receipt of the complaint by the MD & CEO/Board. All information disclosed during the course of the investigation shall be kept confidential, except as necessary to conduct the investigation and for taking any remedial action, in accordance with applicable laws. The specific action to be taken in any particular case depends on the nature and gravity of the conduct or circumstances reported and the evidentiary value and relevancy of the information provided to establish a prima facie case. All employees have a duty to cooperate in the investigation and provide factual information failing which they shall be subject to disciplinary action, including termination of the employment.



8. Action

If, at the conclusion of the investigation, it is determined that a violation of policy has occurred, the Company will take effective remedial action commensurate with the severity of the offence. This action may include disciplinary action against the persons involved in the unethical practice or grave misconduct and making them liable to punishment including termination of employment with the Company without prejudice to its rights to take legal action against the accused employee. Necessary steps will also be taken to prevent further violations of the policy.

9. Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which also prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense including termination of the employment