

Policy for Whistle Blower For FY 2025-26

1. All Branches/Offices
2. Branch at GIFT City
3. PNB Card and Services Ltd.

Division : INSPECTION & AUDIT DIVISION
Version : 2025_IAD_1.0



Policy Custodian

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Policy Version Control

S. No.	Version Number	Version Date	Summary of Changes
1	2019-_IAD_1.0	16.09.2019	Detailed guidelines added
2	2021_IAD_1.0	01.04.2021	NIL
3	2022_IAD_1.0	01.04.2022	NIL
4	2023_IAD_1.0	01.04.2023	NIL
5	2024_IAD_1.0	26.03.2024	Modification/Additions made in clauses w.r.t. Whistle Blower's Protection and Disqualifications from Protection.
6	2025_IAD_1.0	20.02.2025	Incorporated in Policy.

Policy Governance

Frequency Of Review	Annually or as and when required
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Supersedes	IAD HO Circular No. 12/2024 dated 26.03.2024

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1. BACKGROUND

- 1.1 Punjab National Bank (herein after referred to as 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 bank shall establish a vigil mechanism for directors, employees and any stake holder to report concerns about unethical behaviour, actual or suspected fraud or violation of the bank's code of conduct or ethics policy.
- 1.3 This policy is framed in the light of provisions of clause 9 & 10 of section 177 of Companies Act, Clause 8.5 page 13/18 of RBI Master directions on fraud (RBI/DBS/2016-17/28 dated 01.07.2016), Master Directions on Fraud Risk Management in Commercial Banks (including Regional Rural Banks) and All India Financial Institutions (RBI/DOS/2024-25/118 DOS.CO.FMG.SEC.No.5/23.04.001/2024-25 dated July 15 2024 paragraph no 2.1.5) and Clause IV of para 2(d) Chapter II(4) page 7/35 of SEBI Regulations 2015(Listing Obligations and Disclosure Requirements) and related CVC guidelines as applicable and relevant to bank.
- 1.4 This mechanism aims at providing adequate safeguards against victimization of all concerned that avail of the mechanism. Bank shall put in place a transparent mechanism to ensure that Whistle Blower complaints on possible fraud cases / suspicious activities in account(s) are examined and concluded appropriately under its Whistle Blower Policy.

2. OBJECTIVE

This Policy aims to establish a mechanism to receive protected disclosure relating to any allegation of corruption or wilful misuse of power or wilful misuse of discretion against any employee of the bank and to inquire or cause an inquiry into such disclosure and to provide adequate safeguards against victimization of the person making such protected disclosure and for matters connected therewith and incidental thereto.

3. SCOPE

- 3.1 All stakeholders are encouraged as a preventive vigilance measure to report incidences of financial misconduct, wherever noticed.
- 3.2 The policy intends to help all stakeholders who may have concerns over any wrong doing within the Bank to report unlawful conduct, misconduct, malpractices, violation

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of any legal or regulatory provisions, financial mismanagement, accounting irregularities, etc.

3.3 Though an exhaustive list of activities that constitute such misconduct/ malpractice/ violations cannot be enumerated, it is expected that the following acts may be reported under this Policy:

3.3.1 Criminal offence (e.g. frauds, corruption or theft) committed/ likely to be committed.

3.3.2 Failure to comply with legal / regulatory provision

3.3.3 KYC/AML violations to provide some undue advantage to anyone.

3.3.4 Breach of client promises by the Bank

3.3.5 Bank funds used in an unauthorised manner

3.3.6 Sexual or physical abuse of a member of staff, service recipient or service provider.

3.3.7 Any other form of improper action or conduct

3.3.8 Information relating to any of the above deliberately concealed or attempts being made to conceal the same.

3.3.9 Fraudulent activity in an account.

3.3.10 Instances of Leak of unpublished price sensitive information in terms of SEBI (Prohibition of Insider Trading) Regulations, 2015 and Bank's Policy for Prevention of Insider Trading.

3.4 Whistle Blower can make a disclosure against any employee/ officer of the bank upto level of General Manager / Chief General Manager. *

*As regard disclosure against any Director, Executive Director, Managing Director & Chief Executive Officer and Chairman, etc., it can be lodged under Govt. of India PIDPI regulations to designated authority like CVC or Secretary, DFS.

4. COMPETENT AUTHORITY

4.1 A designated Committee comprising of:

- Chairman of the Audit Committee of the Board (ACB)
- Domain Executive Director: Human Resources (HR)
- Domain Executive Director: Inspection Audit Division (IAD),

*In case of non-availability of any of the two domain EDs (HR/IAD), the alternate ED (as per office order) shall participate in the said committee

4.2 This designated Committee will be the Competent Authority to deal with the protected disclosure received under the provisions of this Policy.
Details as mentioned at 2.2 in operational guidelines (Part-II).

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- 4.3 This designated Committee may designate an Authorized Official (presently from the Board and Coordination Division). All the protected disclosures received will be opened in the presence of the Designated Committee by the authorized official nominated by the committee.
- 4.4 TMD(FRMD), as per existing guidelines, will be the Nodal Division for the Whistle Blower Mechanism.

5. ELIGIBILITY

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

- 5.1 Directors of the Bank
- 5.2 Employee of the bank
- 5.3 Employees of other agencies deployed for the bank activities, whether working from any of the bank's offices or any other location.
- 5.4 Contractors, vendors, suppliers or agencies (or any of their employee) providing any material or service to the Bank.
- 5.5 Any other stakeholder.

6. PUBLIC INTEREST DISCLOURE

- 6.1** 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 behaviour. The Bank is committed to develop a culture, where it is safe for all, to alarms concerns about any unacceptable/unethical practice or misconduct at any level.
- 6.2** 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 make a disclosure under this policy.
- 6.3** Every disclosure made as per the provisions of this Policy shall be treated as public interest disclosure before the Competent Authority.
- 6.4** Every disclosure shall be made in good faith and the person making protected disclosure shall make a personal declaration stating that he/she reasonably believes that the information disclosed by him/her and allegation contained therein is substantially true.
- 6.5** Whistle Blower shall also declare that he has not made any complaint on the same subject matter to any outside Authority / Agency or higher executives of the bank,

prior to this disclosure.

- 6.6** Every protected disclosure shall be made in writing or by electronic mail or other modes in accordance with the guidelines as mentioned at Para 4 “Guidelines for handling protected disclosure made by the whistle Blower” of operational Guidelines, containing full particulars and be accompanied by supporting documents, or other materials, if any.
- 6.7** The Competent Authority may, if it deems fit, call for further information or particulars from the person making the disclosure.
- 6.8** No action shall be taken on public interest disclosure by the Competent Authority, if the disclosure does not indicate the identity of the complainant or the identity of the complainant is found incorrect.

7. WHISTLE BLOWER’S ROLE

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.

8. INQUIRY IN RELATION TO DISCLOSURE BY WHISTLE BLOWER

- 8.1** The Competent Authority shall, upon receipt of the protected disclosure while concealing the identity of the complainant, shall make discreet inquiry within maximum period of 15 days, to ascertain whether there is any basis for proceeding further to investigate the disclosure.
- 8.2** The Competent Authority may close the matter, if after conducting an inquiry, is of the opinion that:
- 8.2.1 The facts and allegation contained in the disclosure are frivolous or vexatious; or
- 8.2.2 There are no sufficient grounds for proceeding with the inquiry.
- 8.3** Any disclosure relating to Fraud and subject matters having vigilance implications will be brought to the notice of the CVO for further action.
- 8.4** After conducting the investigation, if Competent Authority is of the opinion that report reveals either wilful misuse of discretion or substantiates allegation of corruption, it shall take following steps:
- 8.4.1 Recommend to appropriate authority for initiation of disciplinary proceeding or administrative action against the erring official(s) as per bank guidelines.
- 8.4.2 Recommend for taking of corrective measure.

8.4.3 The Protected Disclosures received under the provisions of this Policy shall be investigated by the Investigating Officer (IO) within a maximum period of 30 days, after proceeding further to investigate the disclosure if considered under Whistle Blower.

In case of delay in investigation by the Investigating Officer, the Domain ED IAD is empowered to allow additional reasonable time to complete such investigation.

8.4.4 In case the designated committee is of the view that the disclosure is not to be considered under Whistle Blower, TMD(FRMD) the nodal division for the whistle Blower Mechanism shall take up the matter with concerned division and ensure the said matter is taken up to a logical end.

8.5 The Competent Authority, on the merits of the case may or may not decide to go for personal hearing before closure of the matter.

8.6 Following matters shall not be entertained or inquired into by the Competent Authority to the extent:

8.6.1 If any matter specified or an issue raised in a disclosure has been determined by a Court or Tribunal authorized to determine the issue, after consideration of the matter specified or issue raised in the disclosure, the Competent Authority shall not take notice of the disclosure to the extent that the disclosure seeks to reopen such issue.

8.6.2 If any public inquiry has already been ordered under the Public Servants Act or referred for inquiry under the Commission of Inquiry Act.

8.6.3 If the protected disclosure is made after the expiry of seven years from the date on which the action complained against is alleged to have taken place.

8.7 The Competent Authority shall not question any bonafide action or discretion used by the official as per business rules.

9. WHISTLE BLOWER'S PROTECTION

9.1 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 anyone raising a genuine concern.

9.2 The protection is available provided that:

9.2.1 The communication / disclosure is made in good faith.

9.2.2 He/ she reasonably believe that information, and any allegation contained in it, is substantially true.

9.2.3 He/ she is not acting for personal gain.

- 9.3** Bank will not disclose the identity, without his / her consent. If the situation arises where Bank is not able to resolve the concern without revealing the identity (for instance because his/ her evidence is needed in court), bank will discuss with his/ her the matter in which bank propose to proceed, and within the confines of statutory requirements endeavour to meet his/ her preference on revealing the identity.
- 9.4** If an employee is aggrieved by any action against him on the ground of making any disclosure, he may file an application before the Designated Committee, seeking redressal in the matter. The Designated Committee will ensure that no punitive action is taken by any authority concerned against any person on perceived reasons/suspicion of being “Whistle Blower”.

10. Disqualifications from Protection

- 10.1 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.
- 10.2 No protection is available under this Policy from departmental action arising out of false or bogus disclosure made with malafide intention or complaints made to settle personal grievance.
- 10.3 In case the disclosures are subsequently found to be malafide or frivolous or malicious and it is established that Complaint has been made with intention of malice, appropriate disciplinary action will be taken against the concerned employee as per guidelines.
- 10.4 No protection under this policy is available to employee against any adverse action occurring independent of his disclosure under this policy or for alleged wrongful conduct, poor job performance, any other disciplinary action, etc., not relating to the disclosure made pursuant to this policy.

11. GENERAL PROVISIONS

11.1 Disclosure of the Policy

This policy will be placed on the website of the Bank.

11.2. Ownership of the Policy:

Inspection & Audit Division will be the owner of this policy.

11.3 Validity and Review of the Policy

The Policy conforms to the Statutory/ Regulatory Guidelines applicable to the subject matter under reference and reflects the statutory/ regulatory changes that occurred till 10.01.2025. The policy has been duly vetted by Compliance Division.

The policy guidelines will be applicable w.e.f. the date of approval by the Board and shall remain valid for twelve months from the date of approval by the Board. The policy shall be subject to annual review.

Further, Functional Committee (ACE) shall be authorized to:

- 11.3.1** Incorporate any changes necessitated in the policy for the interim period upto the next review, due to regulatory pronouncements made during the validity period of the policy and
- 11.3.2** Extend validity of the policy for period upto three (3) months and the Board will be informed of such extension subsequently at the time of annual review.

11.4 Reporting

There is no regulatory requirement for reporting of this policy to any outside agency/ authority.

11.5 Authority for Approving Operational Guidelines

Functional Committee (ACE) will be the authority for approving operational guidelines.

11.6 Relaxations/Deviations/ Exclusions

NIL

Operational Guidelines of Policy for Whistle Blower For FY 2025-26

1. All Branches/Offices
2. Branch at GIFT City
3. PNB Card and Services Ltd)

Division : INSPECTION AND AUDIT DIVISION

Version : 2025_IAD_1.0



Guideline Custodian

Division	Inspection & Audit Division
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Guideline Version Control

S. No.	Version Number	Version Date	Summary of Changes
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2	2021_IAD_1.0	01.04.2021	NIL
3	2022_IAD_1.0	01.04.2022	NIL
4	2023_IAD_1.0	01.04.2023	NIL
5	2024_IAD_1.0	26.03.2024	Modification/Deletion made in clauses regarding other aspects and format for lodging complaint has been devised.
6	2025_IAD_1.0	20.02.2025	Incorporated in Policy.

Guideline Governance

Frequency Of Review	Annually or as and when required
Last reviewed on	27.02.2024
Approval Path	Audit Committee of Executives
Supersedes	IAD, HO Circular No. 12/2024 dated 26.03.2024

1. PROCEDURE FOR REPORTING

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

- 1.1 The disclosure should be sent in a secured manner by way of closed envelope to the Chairman, Audit Committee of Board.
- 1.2 The envelope should be addressed to the officials as mentioned above and should be super scribed “**Disclosure 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 disclosure or at the end of it.
- 1.3 If the Whistle Blower wants that his/ her name should not be disclosed, the text of the disclosure should be carefully drafted so as not to give any details or clue as to his/her identity. However, the details of the disclosure should be specific and verifiable.
- 1.4 In order to have a speedy disposal of these disclosures, the Whistle Blower should submit disclosure in a closed envelop **super scribed “Disclosure 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.

2. MODALITY OF OPERATION AT THE BANK LEVEL

2.1 Whistle Blower Channels:

- 2.1.1 The Whistle Blower shall lodge the disclosure (As per Performa Annexure A) to the Chairman, Audit Committee of Board in a closed/ secured envelope marked as “**Disclosure 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, 5th Floor, Sector -10, Dwarka, New Delhi-110075
- 2.1.2 The Whistle Blower can disclose through email at whistleblower@pnb.co.in which will be owned by the Designated Committee.
- 2.1.3 The Whistle Blower (only in the case of staff) can make a disclosure through the functionality provided for lodging a complaint under the Whistle Blower Mechanism by any staff through HRMS.
Details mentioned on 4.14 in operational guidelines (Part-II).

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2.1.4 The Whistle Blower can make a disclosure through a functionality provided for lodging a complaint under the Whistle Blower Mechanism, by any staff and members of the Public through a dedicated page provided at the website of the Bank.

Details as mentioned at 4.15 in operational guidelines (Part-II).

2.1.5 The Whistle Blower can make a disclosure through a functionality provided for lodging complaint by any stake holder user of PNB ONE App, under whistle blower mechanism.

Details mentioned at 4.16 in operational guidelines (Part-II).

2.1.6 DBTD HO to ensure that the functionality created for receipt of Whistle Blower Complaint through Website as well as through PNB One App, remains active with smooth working as well as the maintenance/modification/amendment (if any) to be taken up by them only, on the request of the owner Division.

On similar lines HRD to ensure that the functionality remain functional under HRMS.

2.2 A Designated Committee is proposed to oversee the Whistleblower mechanism in our Bank. This committee will include the following members:

- Chairman of the Audit Committee of the Board (ACB)
- Domain Executive Director: Human Resources (HR)
- Domain Executive Director: Inspection Audit Division (IAD),

*In case of non-availability of any of the two domain EDs (HR/IAD), the alternate ED (as per office order) shall participate in the said committee

All the protected disclosures received will be opened in the presence of the designated Committee by the authorized official designated by the Committee.

- a) For disclosures received through email, PNB One and Website, password to the email id: whistleblower@pnb.co.in, may be assigned to the authorized official by the Committee.
- b) For disclosures received through secured envelope and HRMS; the authorized official shall obtain such disclosures after receiving the same from the recipient (at present HRMS ID of the Chairman ACB).

The authorized official will verify the identity of whistle blower and would ensure to safeguard the personal information viz. Name, Employee ID Number, Branch/Location etc. of the Whistle Blower while, taking print-out of the complaint, and accordingly place it before the committee.

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This will ensure in protecting the identity of the complainant and also the confidentiality of the contents. All such complaints received should be kept in a Safe Custody i.e. in a Lock and Key in the custody of the authorized official only.

The authorized official will present the received complaints to the Designated Committee, which will determine whether the disclosure falls under the Whistleblower Policy (as mentioned under 'Scope', at Point Number 3 of the Policy).

If identified as whistle blower complaint, authorized official will enter the same into the Corporate Register containing brief particular of the disclosure received under this Policy. He / she shall assign a Unique Reference Number (URN) to each disclosure.

All inter-office correspondence in respect of disclosures received under Whistle Blower Policy will be done citing only Unique Reference Number (URN) and not the name of Whistle Blower.

2.3 Role of Authorized Official:

Policy provides that the committee may designate an authorized official to handle whistle blower complaints. Some more roles & responsibilities may be added to the role of authorized official as below:

- a) Authorized official will maintain Whistle Blower corporate register with following format:

Date of Complaint.	Receiving Channel with date of receiving the Complaint.	Whether considered as 'Whistle Blower Complaint	*Name & details of Whistle Blower/ Complainant	Person against whom reported	Date of placing before the Designated Committee.	URN no. if considered as whistle blower

*The Authorized Officer shall place the complaint before the Designated Committee (defined above) for deliberation and taking appropriate course of action on the complaint.

2.4 To provide comprehensive MIS, authorized official will maintain the record of complaints, which were not considered as 'Whistle Blower Complaint' by the designated committee.

Date of Complaint.	Receiving Channel with date of receiving the	Name & details of Whistle Blower/	Person against whom reported.	Date of placing before the Designated	Remark of Committee (mentioning specific reason

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	Complaint.	Complaint.		Committee.	for not considering the complaint as 'Whistle Blower Complaint'.

TMD(FRMD) the nodal division for the whistle Blower Mechanism shall take up the matter with concerned division and ensure the said matter is taken up to a logical end.

- 2.5** TMD(FRMD) will continue to be the nodal Division of Whistle Blower Mechanism and will place investigation report to the designated committee.

Further, TMD(FRMD) will obtain information (Summary) from Authorized Official on monthly basis, regarding Opening no. of complaints, complaint received during the month, complaint identified as whistle blower and complaints not identified as whistle blower.

2.5.1 Role of Investigative Function:

Designated Committee if decides to take appropriate course of action on the complaint it will direct TMD(FRMD) to initiate the said action.

TMD(FRMD) may investigate the disclosure at its own or may assign the investigation to any official in the field or may request HO: IAD to get the investigation done from any Auditor/ Senior Official.

TMD(FRMD) will put up status each complaint received under Whistle Blower Mechanism to the ACE/ACB, on quarterly basis, beside the regular Note placed before the said committee.

- a) TMD(FRMD) will maintain Whistle Blower Follow-Up Register as under:

URN no. if considered as whistle blower	Date of filing Complaint	Branch	Person against whom reported	Brief Details of Complaint	Date of Action taken	Nature of Action taken	Date of closure of case	ATR/Status submitted to ACB on

- b) TMD(FRMD) will put up status to the ACE/ACB on a quarterly basis on the following format:

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Review of Whistle Blower cases						
Opening No of Complaints as on	Received during the Quarter	No. Of cases rejected	No of cases where Investigation completed	No cases pending	Allegations not substantiated/ No of cases where action taken against whistle blower for malafide.	
No. of cases where disciplinary action taken against employee under Whistle Blower Policy						
No. of fraud detected under Whistle Blower Policy						
Major areas of the Bank reported under Whistle Blower Policy						
Remedial Action taken/to be taken						
Information about the disclosure which were not to be considered under Whistle Blower						

2.5.2. TMD(FRMD), HO as well as IAD-HO shall nominate a Nodal Officer to handle such matters within their Division to have a better framework of follow-up of these complaints.

2.6 CLI, HO will be responsible for following:

- a) Encourage all employees of the Bank to report suspected or actual occurrence of malafide, unethical, or inappropriate actions, behaviours or practices by staff members without fear of retribution.
- b) To circulate various modes available to raise whistle blower complaints in the Bank to enable the staff members to register their complaints.
- c) Ensure that the Policy is known to all employees.

2 OTHER ASPECTS

3.1 Whistle blower should refrain from sending reminder or seeking further development/ action taken regarding disclosure made by him so as to protect his/her identity.

3.2 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 from the date of closure.

3.3 The standard operating procedure (SOP) for smooth rollout of this policy will be kept updated by the ACE.

3.4 Employment related concerns of routine nature, i.e., salary, perquisites, promotion, Postings, Transfers, performance appraisal, incentives, LFC, etc., should be reported through normal channel meant for the purpose and not under Whistle Blower Policy. Whistle Blower mechanism shall cover only matters where unethical & improper practices, in dealing such matters, are observed.

4 GUIDELINES FOR HANDLING PROTECTED DISCLOSURE MADE BY WHISTLE BLOWER

Receipt of Disclosure under Whistle Blower Policy



4.1 All the protected disclosures received will be opened in the presence of the Designated Committee by the authorized official designated by the committee.

Consideration of Designated Committee and issue of URN



4.2 Once, the Designated Committee, decides that this disclosure can be considered under the Whistle Blower Policy, the authorized official (designated by the committee) will enter it in a Corporate Register containing brief particulars of the disclosure received under this Policy. He / she shall assign a Unique Reference Number (URN) to each disclosure.

4.3 For disclosures received via email at whistleblower@pnb.co.in, password may be assigned to the authorized official, by the designated committee. After receiving the email, the authorized official, by the designated committee, will present the complaints to the committee, which will determine whether the disclosure falls under the Whistleblower Policy. Disclosures received from Closed/ secured envelope, PNB One, HRMS and Website shall also follow this procedure.

If identified as whistle blower complaint, authorized official will enter the same into the Corporate Register and assign a Unique Reference Number

Acknowledgement to Complainant



4.4 Within 3 working days of receipt of a disclosure, ensuring protection of the identity of the complainant, the Authorized official shall, on the directions from the Designated Committee issue a proper acknowledgement to the complainant

followed by an initial response to the Whistle Blower as directed by the designated committee.

Inter-office correspondence



4.5 All inter-office correspondence in respect of disclosure received under Whistle Blower Policy will be done citing only Unique Reference Number (URN) and not the name of Whistle Blower.

Placing Note before Competent Authority



4.6 The authorized official will furnish a brief note covering all details about the matter that Whistle Blower wishes to report. Authorized Official should not mention in the note, the name or any other particulars that may identify the Whistle Blower.

4.7 Copies of documents that may help in establishing the veracity of the report may preferably be attached to the note. However, care may be taken that these papers do not contain the name or any other particulars indicating Whistle Blower's identity.

After placing the disclosure before the designated committee, the Authorized Official shall ensure to black out any such detail which may disclose the identity of the whistle blower. Hence, thereafter all inter-office correspondence will be done by citing only Unique Reference Number (URN) and not the name/details of Whistle Blower.

4.8 The aforesaid note along with instruction of Designated Committee should be sent along with a forwarding letter/ email message to Transaction and Monitoring Division (TMD(FRMD)) for further investigation in the matter and to take appropriate action.

The Protected Disclosures received under the provisions of this Policy shall be investigated by the Investigating Officer (IO) within a maximum period of 30 days, after proceeding further to investigate the disclosure if considered under Whistle Blower.

In case of delay in investigation by the Investigating Officer, the Domain ED IAD is empowered to allow additional reasonable time to complete such investigation.

TMD(FRMD) the nodal division for the whistle Blower Mechanism shall take up the matter with concerned division and ensure the said matter is taken up to a logical end.

Investigation and further Recommendations



- 4.9 HO: TMD(FRMD)/ Vigilance (for matters referred to CVO) may investigate the disclosure at its own / may assign the investigation to any official in the field or may request HO: IAD to get the investigation done from any Auditor/ Senior Official. TMD(FRMD) will put-up status to the ACB on quarterly basis.
- 4.10 The Designated Committee may recommend the matter for Disciplinary action or administrative action.
- 4.11 The Board Division will include the confirmation in Annual Disclosures that the said Designated Committee has not denied access to any stake holder under the Whistle Blower Mechanism.

Placing Note to MD & CEO



- 4.12 If there is any serious issue involved in any type of disclosure, the matter shall be brought to the notice of MD & CEO.

Monitoring of Cases



- 4.13 ACB will monitor all cases of Whistle Blower disclosures regularly and keep the Board informed through the minutes of ACB meeting/ or as deemed appropriate.
- 4.14 Functionality for lodging complaint under the Whistle Blower Mechanism by any staff through HRMS.
- URL: <https://pnbnet.net.in:5005/psp/HRMS/login>
 - Developed for every Staff Member of PNB, for lodging a complaint through a dedicated page in HRMS.
 - The flow in HRMS will be as the follow- 'Self Service>Staff Welfare>Whistle Blower>Add a Value'.
 - Once the employee submits a Complaint, it will directly move to the HRMS of ACB Chairman.
 - An informatory system generated email will automatically be sent to the email ID: whistleblower@pnb.co.in, containing only the information that a complaint has been received in the HRMS of the ACB Chairman.
- 4.15 Functionality for lodging complaint under the Whistle Blower Mechanism, by any staff and members of Public through a page provided at website of the Bank.

पंजाब नेशनल बैंक
निरीक्षण और लेखा परीक्षा प्रभाग, प्रधान कार्यालय
PUNJAB NATIONAL BANK
INSPECTION & AUDIT DIVISION, HEAD OFFICE

- URL: <https://www.pnbindia.in/WhistleComplaintLodge.aspx>
- A Webpage created over the PNB Website for lodging a complaint under Whistle Blower Mechanism.
- The webpage is accessible by clicking over the a hyper link named – “whistle Blower Mechanism” placed at PNB Website home page.
- For lodgement through this facility, the complainant must mandatorily provide his/her credential such as – Name, Address, Email ID, Mobile Number.
- Two different OTPs will be automatically sent at the entered email ID and Mobile Number, this is for authentication of the complainants’ identity.
- The Complaint will be lodged successfully after the OTPs verification.
- An email will be sent to the email ID entered by the Complainant containing the PDF of the lodged complaint having the system generated Complaint Number.
- This lodged complaint will be directly forwarded to the email ID: whistleblower@pnb.co.in.

4.16 Functionality for lodging complaint by any stake holder user of PNB ONE App, under whistle blower mechanism.

- An Icon has been provided over the PNB ONE App that is having navigation as –
- Login PNB ONE home page> More> Services > Whistle Blower.
- By clicking over this icon, the flow will redirect to the already available functionality to lodge a complaint under the Whistle Blower Mechanism at the PNB India Website.

5 VALIDITY AND REVIEW OF OPERATIONAL GUIDELINES

These guidelines will be applicable w.e.f. the date of approval of Policy (Part-I) by the Board and shall remain valid for twelve months from the date of approval of Policy (Part-I) by the Board. This shall be subject to annual review.

Further, Functional Committee (ACE) shall be authorized to extend the validity of operational guidelines for a period upto three (3) months and the Board will be informed of such extension subsequently at the time of annual review.

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PUNJAB NATIONAL BANK
INSPECTION & AUDIT DIVISION, HEAD OFFICE

ANNEXURE A

Format for Disclosure under the provisions of Whistle Blower Policy:

Unique Reference Number (URN) To be filled by Bank	
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The Chairman
Audit Committee of Board
Board & Coordination Division
Punjab National Bank
Head Office, 5th Floor, Sector 10,
Dwarka, New Delhi - 110075

Dated:

Reg: Disclosure under the provisions of Whistle Blower Policy

Personal Information of the Whistle Blower:

1. Name:
2. In case disclosure made by staff
 - (a) Emp. Id _____
 - (b) Present Postings at Branch/Office _____ CO _____
3. Mobile _____ email _____
4. Details of complaint _____ as per sheet
5. Whether similar complaint made to any other authority of matter sub-judice as per knowledge

Declaration: I declare that the above information is furnished by me under whistle blower policy of the Bank in good faith and not for any personal gain. Further I reasonably believe that information and allegation contained in my submission is substantially true.

Signature of Whistle Blower

*Copy of ID proof must be enclosed along with Complaint Form.

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PUNJAB NATIONAL BANK
INSPECTION & AUDIT DIVISION, HEAD OFFICE

BRIEF FACTS OF THE CASE REPORTED UNDER WHISTLE BLOWER POLICY

URN		Date of filing Complaint		Signatures of Authorized Official	
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(For use of Authorized Official, Do not write anything above it)

Facts of the case: (Please submit full details including details of the concerned officials against whom disclosure has been made)
