

# The Patna Electric Supply Co. Ltd

33A, Jawaharlal Nehru Road, Chatterjee International, Unit A-9, 8<sup>th</sup> Floor Russel Street, Kolkata-700071

CIN: L40109WB1956PLC023307

Email: [peslco@gmail.com](mailto:peslco@gmail.com)

Ph No: +91-9163468547

Website: [www.patnaelectricssupplycompany.com](http://www.patnaelectricssupplycompany.com)

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## WHISTLE BLOWER POLICY (VIGIL MECHANISM)

### 1. PREAMBLE

The Patna Electric Supply Co. Ltd. ("the Company") is committed to maintaining the highest standards of ethics, integrity, and transparency in its business conduct. To support this commitment and in compliance with **Regulation 22 of SEBI (LODR) Regulations, 2015** and **Section 177 of the Companies Act, 2013**, the Company has formulated this **Whistle Blower Policy / Vigil Mechanism** to provide a framework for directors, employees, and stakeholders to report genuine concerns about unethical behavior, actual or suspected fraud, or violation of the Company's code of conduct.

### 2. OBJECTIVES

- To encourage stakeholders to report unethical behavior, malpractice, fraud, or violations of legal or regulatory requirements.
- To ensure that concerns are properly investigated and appropriate corrective actions are taken.
- To provide protection to whistleblowers against any form of retaliation or victimization.

### 3. APPLICABILITY

This Policy applies to:

- All employees (permanent, temporary, contractual)
- Directors (executive and non-executive)
- Other stakeholders including vendors, consultants, and service providers having a business relationship with the Company

### 4. SCOPE OF THE POLICY

This Policy covers reporting of any concerns related to:

- Violation of Company's Code of Conduct or ethics
- Criminal offenses, fraud, corruption, bribery, or theft
- Financial irregularities or misappropriation
- Insider trading or leakage of price-sensitive information

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- Misuse of Company's assets or authority
- Harassment (including sexual harassment)
- Any other unethical, unlawful, or improper conduct

## 5. WHISTLE BLOWER PROTECTION

- Whistleblowers making disclosures in good faith shall be protected against any retaliation, harassment, or adverse action.
- The Company shall not tolerate any attempt to suppress or victimise the whistleblower.
- Any employee or director found to be retaliating shall be subject to disciplinary action, including termination.

## 6. REPORTING MECHANISM

### a) Channels for Reporting

Whistleblowers can report concerns in the following ways:

- **Email:** [pesclco@gmail.com](mailto:pesclco@gmail.com)
- **Letter** (marked "Private and Confidential"):  
To the Chairman, Audit Committee  
The Patna Electric Supply Co. Ltd.  
[Registered Office Address]

### b) Anonymous Complaints

- Anonymous disclosures are permitted but may limit the ability to investigate effectively.

### c) Details to be Provided

A complaint should ideally include:

- Name and contact (optional if anonymous)
- Brief background and facts of the concern
- Relevant documents/evidence (if any)

## 7. HANDLING AND INVESTIGATION OF COMPLAINTS

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- The **Audit Committee** of the Board shall oversee the vigil mechanism.
- All complaints shall be recorded and handled by the **Vigilance Officer** or **Compliance Officer**.
- Investigations will be conducted in a fair and unbiased manner, maintaining confidentiality.
- The Audit Committee will receive quarterly reports on whistleblower complaints and action taken.

## **8. PROTECTION OF IDENTITY AND CONFIDENTIALITY**

- The identity of the whistleblower and the details of the complaint will be kept strictly confidential to the extent practicable.
- Disclosure will only be made on a "need to know" basis or if required by law.

## **9. DISCIPLINARY ACTION**

- If allegations are found true, appropriate disciplinary/legal action will be taken.
- Malicious or frivolous complaints made with intent to harm shall also attract disciplinary action.

## **10. ACCESS TO CHAIRMAN OF THE AUDIT COMMITTEE**

In case the whistleblower feels that the issue is not being addressed or is sensitive enough, they may directly approach the **Chairman of the Audit Committee** by email or letter.

## **11. DISPLAY AND DISCLOSURE**

In compliance with **Regulation 46(2)(e)** of SEBI LODR:

- The Policy shall be uploaded on the Company's website: [www.patnaelectricssupplycompany.com](http://www.patnaelectricssupplycompany.com)
- Disclosure shall be made in the **Corporate Governance** section of the **Annual Report** stating:

## **12. AMENDMENT**

This Policy may be amended by the Board of Directors from time to time in line with changes in laws or governance requirements.

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