

**KINGS INFRA VENTURES LIMITED****WHISTLE BLOWER POLICY****WHISTLE BLOWER POLICY - REPORTING IRREGULAR PRACTICES IN ANY OPERATIONAL AREAS INCLUDING FRAUDS & MALPRACTICES AT OFFICES****OBJECTIVE**

As a part of handling complaints, maintenance of Corporate Governance and towards achieving greater transparency, 'Whistle Blower Mechanism' is being put in place to enable our employees to report unethical practices, frauds, if they observe in any operational area. The policy has been put in place to provide a framework to employees to act as whistle blowers. It aims to protect such whistle blowers wishing to raise a concern about any allegations of corruption or of misuse of office that could jeopardize the interest of the Bank.

DEFINITIONS & MODE OF MAKING COMPLAINT**DESIGNATED AUTHORITY UNDER WHISTLE BLOWER POLICY**

The Chief Financial Officer [in his absence the Whole Time Director], will be the "Designated Authority".

AUTHORIZED OFFICIAL UNDER WHISTLE BLOWER POLICY

An officer not below the level of Whole Time Director Wing, authorized by the Designated Authority for receiving and handling of whistle blower complaint.

MODE OF MAKING COMPLAINT

Any complaint under this Policy shall be addressed to the Chief Financial Officer (in his absence the Whole time Director), the Designated Authority in the prescribed format enclosed as ANNEXURE-A. The employees of the Company may make the complaint through written complaint in a closed/secured envelope shall be addressed to the Designated Authority at the following address:

To,
The Chief Financial Officer
Kings Infra Ventures Limited
14B, 14th Floor, The Atria,
Oppo. Gurudwara Temple,
Thevara, Kochi – 682015, Kerala, India

**ROLES AND RESPONSIBILITIES:****PROCEDURE FOR HANDLING OF COMPLAINTS**

When the complaints submitted in physical form, the envelope shall be super scribed with “Complaint under the Whistle Blower Mechanism”. If the envelope is not super scribed as mentioned above, it will not be possible to protect the complainant under the above mechanism and the complaint will be dealt with as a normal complaint. The complainant shall give his/her name and address, telephone number, email id, in the beginning or end of the complaint or in an attached letter. The disclosure or complaint shall contain, as full particulars as possible and shall be accompanied by supporting documents or other materials.

All such envelopes will be opened by the Authorized Official in presence of the Designated Authority only. The identity of the complainant would be confirmed by the Authorized Official by writing a letter to him/her. Sample of the letter is enclosed as ANNEXURE- B.

The Whistle Blower/Complainant will be required to confirm within 30 days of receipt of letter that he/she had sent the complaint and also confirm/certify that he/she had not made similar/identical allegations of corruption/misuse of office to any other authority to qualify as a “Whistle Blower” complainant. While sending such confirmation envelope should be superscribed with “Complaint under the Whistle Blower Mechanism.” If the envelope is not superscribed as mentioned above, it will not be possible to protect the complainant under the above mechanism and the complaint will be dealt with as a normal complaint.

In case the identity of the complainant is not confirmed, the complaint will be treated as anonymous/pseudonymous and will not be entertained. After the identity of the complainant is confirmed, the Authorized Official shall record the details of the complainant.

PROCEDURE TO BE ADOPTED AFTER ESTABLISHING THE IDENTITY OF COMPLAINANT:

On receipt of complaints through physical form, the Authorized Official will ensure that the identity of the complainant is removed from the body of the complaint and the dummy complaint is given a number with which the original complaint can be traced back. Further action on complaint will be initiated as per Company norms.

The complaint received through physical mode would be kept in a safe/almirah duly ensuring dual custody. The custody of the almirah will remain with the Authorized Official and at no point of time the complaint can be accessed except by the Authorized Official/ Designated Authority.

The dummy complaint so made would be submitted to the 'Designated Authority' who would take the decision whether the matter requires to be looked into further and report is to be called in the matter from the respective Circles. (Separate file may be maintained for complaints under Whistle Blower Mechanism).

While considering the complaints, the "Designated Authority" would take no action on complaints relating to administrative matters like recruitment, promotion, transfers and other related issues.

In such cases, where a decision has been taken to call for a report, a maximum time limit of 2 weeks may be given. In case no reply is received within two weeks, a reminder should be sent at the level of the Authorized Person. If no reply is still received, the second reminder after 2 weeks should be sent at the level of the "Designated Authority". If no reply is still received, the "Designated Authority" may call for an explanation and recommend administrative action for deliberate delay.

On receipt of the report, the concerned Authorized Official will place the matter to the 'Designated Authority'. The Designated Authority may take a call on the matter and take appropriate action as per Bank norms. In case of serious complaints of irregularities, the Designated Authority shall order a detailed investigation into the matter. On receipt of the Investigation Report, the same shall be scrutinized by the Audit Committee constituted as per Section 177 of Companies Act 2013, for initiating further action in the matter. The "Designated Authority" shall ensure that no punitive action is taken by any concerned Administrative Authority against any person on perceived reasons/suspicion of being "whistle blower". The Authorized Official shall maintain a separate list for the complaints received under the Policy and monitor their progress periodically and put up the same to the 'Designated Authority' every 2 weeks.

Wherever the complainant has alleged victimization/ harassment, the 'Designated Authority' shall ensure that if the identity of the complainant somehow becomes known, he/she should not be harassed/victimized by way of frequent transfers etc.

DISQUALIFICATIONS

While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection will warrant appropriate action/disciplinary action.

Protection under this policy would not mean protection from disciplinary action arising out of allegations made by the Whistle Blower which are found to be false or bogus or done with a malafide intention.

REVIEW OF FUNCTIONING OF THE WHISTLE BLOWER MECHANISM/ REPORTING STRUCTURE/ MONITORING:

A quarterly report with the number of complaints received under this Policy by the HR Executive along with outcome shall be placed before the Audit Committee of the Board.

**PUBLICATION**

The Policy will be posted on the Company's website.

ORDER OF PREVALENCE:

This shall be in supersession of all earlier Circulars, instructions issued on the subject matter.

OPERATION:

This policy shall be in force till such time it is repealed.

GENERAL PROVISIONS/ EXCEPTIONS:

Anonymous/ pseudonymous complaints will not be entertained in terms of Central Vigilance Commission guidelines.

The text of the complaint should be carefully drafted so as not to give any details or clue as to the identity of the whistleblower. However, the details of the complaint should be specific and verifiable.

The identity of the complainant will not be revealed unless the complainant himself/ herself has made the details of the complaint either public or disclosed his/ her identity to any other office or authority.

REGULATORY PRESCRIPTION:

This Whistle Blower Policy is based on the provisions of Companies Act, In compliance clauses of listing agreement of SEBI and RBI Directions.

MAKING MODIFICATIONS / ISSUING CLARIFICATIONS:

The Managing Director & CFO or in his absence, the Executive Director, shall be competent to make any changes, issue clarification with respect to the policy in tune with the Government Guidelines/ Central Vigilance Commission Guidelines/other Regulatory guidelines issued from time to time.

**ANNEXURE – A****WHISTLE BLOWER COMPLAINT FORM**

Code No.		Date of filing complaint		Initial of Designated Authority	
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(For use of Designated Authority, do not write anything above it)

(FOR USE OF ALL THE STAFF OF KINGS INFRA VENTURES LIMITED)

To
The Whole Time
Director,
Kings Infra
Ventures Limited
14B, 14th Floor,
The Atria, Oppo.
Gurudwara
Temple, Thevara,
Kochi – 682015,
Kerala, India

PERSONAL INFORMATION OF WHISTLE BLOWER

Name:

Staff No.:

Mobile No.:

Email ID (Optional):

Branch: _____ Address:

Regional Office:

Circle:

Person against whom the complaint is made: As per enclosed sheet
Gist of Complaint: As per enclosed sheet

Complaint letter and supporting document (if any):

Attachment ID Proof of the Whistle Blower

(Mandatorily to be enclosed):

Date:

Place:

DECLARATION

I declare that the above information furnished under Whistle Blower Policy is true and correct. I am aware that in case of wrong complaint, I am liable for disciplinary action as per policy. I confirm that, I have not made any similar/identical allegations of

corruption/misuse of office to any other authorities to qualify as a ‘Whistle Blower Complaint’.

Date:

Place: (SIGNATURE OF EMPLOYEE)

Code No		Date of filling Complaint		Initial Designated Authority	of	
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(For use of Designated Authority, do not write anything above it)

**WHISTLE BLOWER COMPLAINT
BRIEF FACTS OF THE CASE REPORTED UNDER**

Statement of facts: (Please use extra pages if necessary)

Statement detailing acts of commissions/omissions of the person(s) against whom disclosure is made:(Please use extra pages if necessary)

Was this disclosure made to anyone in the past? If yes, when and to whom?

**ANNEXURE - B****CONFIDENTIAL**

Speed post/Registered post

To,
Sir,
.....
.....

Please refer to your complaint dated ----- received on..... under "Whistle Blower Policy".

2. As per policy, a complainant is required to confirm that he/she has actually sent the said complaint to the Company. You are, therefore, requested to confirm within 30 days of receipt of this letter, that you have sent the above-mentioned complaint.

3. You are also requested to furnish a certificate to the Company as per the format enclosed, that you have not made similar/identical allegations of corruption/misuse of office to any other authorities to qualify as a 'Whistle Blower' complainant.

4. The reply may be addressed to the undersigned by name.

Yours faithfully.

Encl: Certificate

CERTIFICATE

It is certified that I have not made similar/identical allegation of corruption/misuse of office to any other authorities to qualify as a Whistle Blower complainant.

Date:

Signature

Name of the Complainant