

Vigil Mechanism (Whistle Blower Policy)

As required Section 177 of the Companies Act, 2013 & in compliance with clause 49 of the Listing Agreement with BSE, the Company hereby lays down a vigil mechanism (whistle blower Policy), for the directors & employees to report concerns of unethical behavior, fraud or violation of the Company's "Code of Conduct", which have taken place or are suspected to take place.

Eligibility :

All directors & employees of the Company are eligible to make disclosures under the policy on matters relating to the Company, in writing, addressed to the Vigilance Officer of the Company or to the Chairman of the Audit Committee, in exceptional cases, whose contact details are as under :-

Vigilance Officer

Mr. Alok Chowdhury
Phone:022- 26242144
Email:info@ppdcl.com

Chairman of Audit Committee

Mr. Satendra Bhatnagar
Mobile:9820366025
Email:satyendrakb@yahoo.co.in

Objective & Procedure :

The disclosure reported under this policy should be factual and contain specific information enabling proper assessment of the nature of the concern & must be forwarded under a covering letter bearing the identity & signature of the person. Anonymous disclosures are not eligible for consideration under this policy. As far as possible, the disclosures should be reported within 30 days after the whistleblower becomes aware of the same.

The Vigilance Officer, after receiving the disclosures, shall detach the forwarding letter having the identity of the Whistleblower, & process only the disclosures, to protect his identity.

All disclosures under this Policy will be recorded & thoroughly investigated, by appointing outside agencies, if so needed. The decision to conduct an investigation, by itself, would not tantamount to accusation, but will be treated as a neutral fact-finding process. No allegation of wrongdoing will be considered as maintainable unless supported by adequate & good evidence. The investigation should be completed within 120 days of receipt of disclosures, & or, as extended by the Audit Committee. Care will also be taken that there is no conflict of interest situation in the entire process of investigation.

Protection :

The whistleblower will receive complete protection from unfair practices like, threats, disciplinary action or any type of retaliatory action. He will continue to perform his duties without any direct or indirect obstruction to all his rights as the director / employee of the Company.

While genuine whistle blowers would get complete protection from unfair treatment, false or bogus allegations made with a mala fide intention, would not obtain protection from disciplinary action under this Policy.

Retention of Documents :

The Papers related to the Disclosures under this policy would be retained for a period of five years or such other period as specified by any other law in force, whichever is more.

Decision :

In case the investigation concludes that an improper or unethical act has been committed, the Vigilance Officer / Chairman of Audit Committee will recommend to the Company to take such disciplinary or corrective action as it deems fit while adhering to the applicable staff conduct & disciplinary procedures.

Amendment :

The Company reserves the right to modify this Policy in while or in past, without assigning any reason whatsoever. The amendments, however, would become applicable only after they have been communicated.