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WHISTLE BLOWER POLICY

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[w.e.f. 03.09.2015]

**West Bengal Infrastructure Development
Finance Corporation Limited**



WHISTLE BLOWER POLICY OF WBIDFC

1. Preface

- 1.1 Section 177(9) of the Companies Act, 2013 read with Rule 7 of the Companies (meeting of Board and its Powers) Rules, 2014 require every listed company and other class of companies to establish a vigil mechanism. It is an in-built system for Directors and employees to report direct to the Chairperson of the Audit Committee of their genuine concerns or grievances of unethical behavior, incidents, actual or suspected, fraud or violation of the Company's code of conduct or ethics policy for which Company is to provide for adequate safeguards against victimization of such persons who use such mechanism.
- 1.2 Accordingly, this Whistleblower Policy ("the Policy") has been formulated with a view to provide a mechanism for dealing with disclosure by Directors and employees of WBIDFC Ltd in which a Director or an employee of WBIDFC Ltd, is suspected or alleged to have acted for an improper purpose or in a corrupt manner in violation of the company's general guidelines. It also ensures adequate safeguard to the whistle blower against victimization and reprisals for such disclosure.

2. Objective:-

- 2.1 The policy is formulated with the objective to provide an opportunity to Directors and employees of WBIDFC to report to the management instances of unethical behavior, actual or suspected, fraud or violation of the company's general guidelines by an employee/Director of WBIDFC.
- 2.2 It is also to provide necessary safeguards for such employees disclosing such instances from reprisals or victimization.

3. Exception:-

- 3.1 A whistle blower proceeded against for any criminal and/or departmental misconduct, misdemeanor, negligence of duties or violation of service rules or for any action, not related with such disclosure under this policy, shall not be liable to be protected under this policy



