

Bihar Police Buildings Constructions Corporation Private Limited

(A Government of Bihar Undertaking)

Corporate Identity No. U45200BR1974SGC001126

Regd. Office: Kautilya Nagar, Near BSAP-05 Campus,

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Vigil Mechanism Policy

1. Introduction

The Bihar Police Buildings Constructions Corporation Private Limited ("BPBCC" or "the Company") is committed to upholding the highest standards of ethics, transparency, and accountability. In alignment with these values, the Company has established a Vigil Mechanism ("the Policy") to facilitate the reporting of concerns about unethical behavior, misconduct, or any practices that may harm the Company's operations or reputation.

This Policy complies with the provisions of Section 177(9) of the Companies Act, 2013, which mandates the creation of a vigil mechanism for employees and directors to report genuine concerns.

2. Objectives

The objectives of this Policy are:

- a) To encourage employees, directors, stakeholders and other associated parties to report unethical conduct, fraud, or violations of Company policies.
- b) To ensure that concerns can be raised without fear of retaliation, discrimination, or harassment.
- c) To provide a clear process for investigating and addressing complaints raised under this Policy.

3. Scope

This Policy applies to all acts of unethical behavior, malpractices, fraud, and violations of the Company's Code of Conduct, including:

- a) Financial irregularities or fraud

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- b) Corruption and bribery
- c) Misuse of Company's assets
- d) Non-compliance with legal and regulatory obligations
- e) Abuse of power or authority
- f) Workplace discrimination, harassment, or bullying.

4. Reporting Mechanism

- a) **Whistle-blower:** Any employee, director, vendor, customer, or other stakeholders may raise concerns regarding unethical or improper conduct within the Company.
- b) **Confidentiality:** The identity of the whistle-blower will remain confidential and will only be disclosed if required by law or necessary for the investigation.
- c) **How to Report:** All concerns must be reported directly to the **Chairman-cum Managing Director (CMD)** of the Company, who is the sole authorized person responsible for the implementation of this Policy.
 - o **Submission of Complaints:** Complaints may be submitted in writing or via email to the CMD at policenigam@bihar.gov.in. The complaint should include detailed information on the nature of the concern, individuals involved, and any supporting evidence.

5. Investigation Process

- a) Upon receiving a complaint, the **Chairman-cum-Managing Director (CMD)** will conduct a preliminary review to assess its validity.
- b) If the CMD deems it necessary, a thorough investigation will be initiated. The whistle-blower may be requested to provide additional details or evidence as part of the investigation.
- c) Investigations will be conducted impartially and confidentially, with a focus on resolving the matter promptly and fairly.
- d) After the investigation, the CMD will take appropriate corrective and disciplinary actions, if required, based on the findings.



6. Protection of Whistle-blower

The Company assures that no whistle-blower will face retaliation, discrimination, or any form of adverse employment action for reporting concerns in good faith. Any acts of retaliation or discrimination against a whistle-blower will lead to disciplinary measures.

If a whistle-blower believes they are being retaliated against, they may escalate the issue directly to the CMD for resolution.

7. False Complaints

While the Company encourages genuine reporting, any false or malicious complaints made with an intent to harm the reputation of others will result in disciplinary actions against the complainant.

8. Role of the Chairman cum Managing Director (CMD)

The Chairman-cum-Managing Director will have the overall responsibility for the functioning of the vigil mechanism. The CMD will ensure that all complaints are thoroughly investigated and that appropriate corrective actions are taken to address valid concerns.

9. Amendments

The Company reserves the right to modify or amend this Policy at any time, as required, provided that such amendments comply with applicable laws and regulations.

10. Conclusion

BPBCC is committed to fostering an ethical and transparent working environment. The Vigil Mechanism Policy is a step toward ensuring that employees and stakeholders can report concerns without fear and that those concerns will be addressed appropriately and confidentially.

Shreetha
17/11/2024