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WHISTLEBLOWER POLICY

PLIL/ FCU/POLICY/001

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Document Information

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Prepared by	Designation	Date	
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Approved by	Designation	Date	
Board of Directors		10-Feb-2014	
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Change Date	Change Summary	Change Reasons	Change By	New Version	Approved by
	PLIL/FCU/POLICY/001/3.2	Change in designations	Gaurav Mathur – AVP & Head Fraud Control Unit	3.2	Board Members
APRIL 2018	PLIL/FCU/POLICY/001/3.3	1. Incorporate requirements of IRDA Corporate Governance guidelines vide ref. no. IRDA/F&A/GDL/CG/100/05/2016 2. Disciplinary committee process and its members	Gaurav Mathur – AVP & Head Fraud Control Unit	3.3	Board Members
MARCH 2019	PLIL/FCU/POLICY/001/3.4	Change in designations	Gaurav Mathur – AVP & Head Fraud Control Unit	3.4	Board Members
SEPT 2019	PLIL/FCU/POLICY/001/3.5	Change in designations	Vinay Sharma – Sr. Manager & Head Fraud Control Unit	3.5	Board Members
MAY 2020	PLIL/FCU/POLICY/001/3.6	Modification in Escalation Matrix	Vinay Sharma – Sr. Manager & Head Fraud Control Unit	3.6	Board Members



Policy

Employees must report suspected unethical or illegal behavior to members of the Disciplinary Committee or Fraud Control Unit. This includes concerns relating to possible irregularities, governance weaknesses, financial reporting issues or other such matters. Under exceptional circumstances employees may report issues in confidence directly to the Chairman of the Board or of a Committee of the Board or to the Statutory Auditor.

The Company will neither engage in nor tolerate retaliatory, threatening or harassing acts against any employee for reporting suspected unethical or illegal behavior or practices.

The Company's Appointed Actuary and the statutory/ internal auditors have a duty to 'whistle blow', i.e. – to report in a timely manner to the IRDAI if they are aware that the Company has failed to take appropriate steps to rectify a matter which has a material adverse effect on its financial condition.

The Company's Board or any of its Committees that it so appoints shall be briefed annually by management on Whistleblower complaints, investigations and Action taken.

Purpose

The purpose of the policy is to ensure that employees report suspected unethical or illegal behavior or practices and to protect them from acts of retaliation.

Responsibilities

Heads of Business Divisions, Businesses within the Divisions, and Corporate Departments

- Reports of unethical or illegal behavior or practices made by their employees are appropriately reported to Fraud Control unit for investigation.
- Whistle blowers are not subjected to retaliation, threats or harassment of any kind within the business or corporate department; and
- Partner with FCU, Legal, Human Resources and Compliance as needed and appropriate regarding employee complaints of unethical or illegal practices, as well as threats or acts of retaliation against reporting employees.

Fraud Control Unit:

- Shall perform independent and objective investigation.
- Maintaining anonymity, if requested, of employees who report unethical or illegal behavior or practices to the extent possible unless legally prohibited



- Ensuring that allegations of unethical or illegal conduct received are appropriately investigated; and
- Partnering with, Human Resources, Legal, Internal Audit, and Compliance, as appropriate.

Employees:

- Must report suspected unethical or illegal behavior to members of the Disciplinary Committee or Fraud Control Unit.
- Are prohibited from retaliating against, threatening or harassing an employee for reporting suspected unethical or illegal behavior; and
- In cases where an internal or external whistleblower reports a matter to any employee, he/ she is obliged to immediately report the event to members of the Disciplinary Committee or Fraud Control Unit.
- Are prohibited from knowingly reporting false or misleading information.

Disciplinary Actions

The Company has established a Disciplinary Committee ("Committee") chaired by the MD & CEO that shall decide and concur upon disciplinary actions to be taken against employees and intermediaries based on investigation findings. The Committee or a Sub-Committee that it so appoints, will decide the disciplinary action(s) after reviewing and discussing the report. The Committee will evaluate each instance of misconduct in consideration of the facts and circumstances of the incident(s). While determining disciplinary actions it may take into account relevant considerations such as prior or similar misconduct at the Company, length of experience at the Company and nature and severity of the violation. The decisions of the Committee will be documented.

The range of disciplinary actions includes, but is not limited to, warning and training, compensation adjustments including withholding sales incentives, probation, suspensions, and termination of employment. In addition, conduct leading to disciplinary actions by the Company may serve as the basis for disqualifying the employees and associates from Conferences and other recognition programs. The Committee may also recommend training re-enforcement, process improvements or changes, where applicable. The Company retains the sole discretion to evaluate violations of Company policy and to determine the appropriate discipline.

As per the decision of the Disciplinary Committee, the Fraud Control Unit will communicate actions to relevant functions for implementation. Human Resources will issue applicable letters of warning, probation, probation extension, recoveries, suspensions, termination of employment to employees. Disciplinary actions involving employees will be communicated to the concerned employee(s) by his/ her/ their management and/ or Human Resources.



Human Resources will coordinate any related administrative operations follow-up and implementation and intimate the Fraud Control Unit for its records. In case of disciplinary action against agents, Distribution Operations will perform the necessary administrative tasks.

Escalation Matrix

Contact information for key personnel and department to whom employees may raise their concerns is as follows:

Name	Designation	Address	Contact Number	Email
Fraud Control Unit		2 nd Floor, 9B, DLF Cyber City, Phase III, Gurgaon - 122002		Fraud.control@pramericalife.in
Malay Ray	Chief Risk Officer	4th Floor, 9B, DLF Cyber City, Phase III, Gurgaon - 122002	+ 91-124-4697352 +91-9811692133	malay.ray@pramericalife.in
Sharad Kumar Sharma	Chief Human Resource Officer and Business Ethics Officer	4th Floor, 9B, DLF Cyber City, Phase III, Gurgaon - 122002	+ 91-124-4697130 +91-9999796149	sharad.sharma1@pramericalife.in
Alok Mehrotra	Chief Financial Officer	4th Floor, 9B, DLF Cyber City, Phase III, Gurgaon - 122002	+ 91-124-4697042 +91-9953188432	alok.mehrotra@pramericalife.in
Kalpana Bharat Sampat	Chief Operating Officer	4th Floor, 9B, DLF Cyber City, Phase III, Gurgaon - 122002	+ 91-124-4697280 +91-9819345998	kalpana.sampat@pramericalife.in
Anoop Pabby	MD & CEO	4th Floor, 9B, DLF Cyber City, Phase III, Gurgaon - 122002	+ 91-124-4697010 +91-9873341570	anoop.pabby@pramericalife.in