

Dynamic Portfolio Management & Services Ltd.

Regd. Off. : 53-A, Mirza Ghalib Street, 4th Floor, Kolkata - 700 016
Phone : 033 - 3291 0308, 2229 2597 / 3283, Fax : +91-33-2227 2512
E-mail : dpms.kolkata@gmail.com Website : www.dynamicwealthservices.com

VIGIL MECHANISM / WHISTLE BLOWER POLICY

PREAMBLE

Section 177 of the Companies Act, 2013 requires every listed company and such class or classes of companies, as may be prescribed to establish a vigil mechanism for the directors and employees to report genuine concerns in such manner as may be prescribed and Clause 49, effective from October 1, 2014, of the Listing Agreement provides for a mandatory requirement for all listed companies to establish a mechanism called Whistle Blower Policy for employees to report to the management instances of unethical behaviour, actual or suspected fraud or violation of the company's code of conduct.

A vigil mechanism shall provide for adequate safeguards against victimization of persons who use such mechanism and also make provision for direct access to the chairperson of the Audit Committee in appropriate or exceptional cases. Dynamic Portfolio Management & Services Limited, being a Listed Company establishes a Vigil Mechanism.

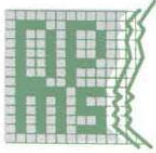
POLICY OBJECTIVES

The Vigil Mechanism guide Directors and Employees to report genuine concerns about unethical behavior, actual or suspected fraud or violation of the Code of Conduct or policy.

The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations and in order to maintain these standards, the Company encourages its employees who have genuine concerns about suspected and/or actual misconduct to come forward and express these concerns without fear of punishment or unfair treatment.

SCOPE

The Mechanism is an extension of the Code of Conduct for Directors & Senior Management Personnel and covers disclosure of any unethical and improper or malpractices and events which have taken place/ suspected to take place involving:



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1. Breach of the Company's Code of Conduct
2. Breach of Business reliability and principles
3. Breach of terms and conditions of employment and rules thereof
4. Intentional Financial irregularities, including fraud, or suspected fraud
5. Manipulation of company data/records
6. Perforation of confidential/propriety information
7. Misappropriation of Company funds/asset

Definitions:

“Audit Committee” means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013 and read with revised Clause 49 of the Listing Agreement with the Stock Exchanges.

“Company” means Dynamic Portfolio Management & Services Limited

“Code” means Conduct for Directors and Senior Management Personnel adopted by Dynamic Portfolio Management & Services Limited

“Employee” means every employee of the Company, including the Directors in the employment of the Company.

“Protected Disclosure” means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. Protected Disclosures should be factual and not speculative in nature

“Subject” means a person against or in relation to whom a Protected Disclosure has been made or evidence gathered during the course of an investigation.

“Whistle Blower” means an Employee making a Protected Disclosure under this Policy.

PROCEDURE

All Protected Disclosures should be reported in writing by the complainant as soon as possible, not later than 30 days after the Whistle Blower becomes aware of the same and should either be typed or written in a legible handwriting in English.



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The Protected Disclosure should be submitted under a covering letter signed by the complainant in a closed and secured envelope or sent through email with the subject "Protected disclosure under the Whistle Blower policy".

All Protected Disclosures of the Directors, Key Managerial Personnel and other Employees including Assistant General Manger above cadre should be addressed to the Chairman of the Audit Committee.

All Protected Disclosures of the other Employees i.e below Assistant General Manger cadre should be addressed to the Vigilance Officer of the Company.

The contact details of the Vigilance Officer of the Company are as under:-

Mr. Ravi Kumar Newatia
Director
53A. Mirza Galib Street
4th Floor, Kolkata – 700016
033-22293283,22292597