

THE VISAKHAPATNAM CO-OPERATIVE BANK
CENTRAL OFFICE: VISAKHAPATNAM

WHISTLE BLOWER POLICY

REVIEWED ON 23.03.2025

WHISTLE BLOWER POLICY

1. OBJECTIVE

The objective of 'Whistle Blower Policy' is to ensure highest ethical, moral and business standards in the course of functioning and to build a lasting and strong culture of Corporate Governance within the Bank. In terms of Policy, an internal mechanism is established for staff members to report to the management, concerns about unethical behavior, actual or suspected fraud or violation of the Bank's Code of Conduct. The Policy is intended to encourage all employees of the Bank to report suspected or actual occurrence of illegal, unethical or inappropriate actions, behavior or practices by staff members without fear of retribution. The employees can voice their concerns on irregularities, malpractices and other misdemeanors through this policy. It also provides necessary safeguard and protection to the employees who disclose the instances of unethical practices/ behavior observed in the Bank.

2. DEFINITIONS

Whistle Blower- The Employees of the Bank making the disclosure under this policy is called whistle blower. The Whistle Blower's role is that of a reporting party. Whistle blowers are not investigators or finders of facts; neither can they determine the appropriate corrective or remedial action that may be warranted.

Designated Official– Zonal Managers are the designated authority to receive reports from whistle blowers of respective Zones. In charge of HR department also is the designated authority for receiving the reports from the whistle blowers of any branch/ Office of the Bank

Subject – Branch / Employee– The specific branch and/or employee in respect of whom disclosure is being made is called – the Subject.

Employees– All employees of the Bank, including officer and award staff members, as also those under contract service in the Bank can act as Whistle blowers.

Disclosure – Any communication, whether by letter/ email/SMS/Watts-app I or over telephone, relating to unethical practice or behavior or violation of service rules/ procedures/ policies, made in good faith by the Whistle Blower?

Reviewing Authority – Chief Executive Officer of the Bank , shall be the reviewing Authority. Upon receiving the remarks and recommendation, he may take a view on closure of the complaint or forward the same to the concerned department for initiation of necessary action/ enquiry under Service Rules/ Bipartite Settlement, standing rules as the case may be.

3. COVERAGE

All employees of the Bank posted at branches/offices are covered under this policy. The Policy covers malpractices and events which have taken place/ suspected to have taken place in the Bank involving:

- Corruption
- Frauds
- Misuse/ abuse of official position,
- Manipulation of data / documents,
- Any other act of an employee which affects the interest of the Bank adversely and has the potential to cause financial or reputational loss to the Bank.
 - a) The details in the complaint should be specific and verifiable.
 - b) Suitable proof of his identity / contact numbers / address so that additional information, if any, can be obtained. In case identity cannot be ensured, the complaints will be treated as anonymous complaints, and may not attract further action.

4. CONFIDENTIALITY MECHANISM OF WHISTLE BLOWER:

Upon receipt of Complaint, the Designated Authority will enter the particulars of Complaint in the Register and allot a number. While preserving the complaint, the details will be sent to the departments for verification. The Designated Officer will strive to ensure that identity of Whistle Blower is not disclosed. The register will be confidential and retained with the Designated Official.

5. PROTECTION TO WHISTLE BLOWER

- I. The Bank will protect the confidentiality of the complainants and their names / identity will not be disclosed except as statutorily required under law.
- II. No adverse penal action shall be taken or recommended against an employee in retaliation to his disclosure in good faith of any unethical and improper practices or alleged wrongful conduct. It will be ensured that the Whistle Blower is not victimized for making the disclosure.
- III. In case of victimization in such cases, serious view will be taken including departmental action on such persons victimizing the Whistle Blower
- IV. Identity of the Whistle Blower will not be disclosed to the Investigating Official.
- V. If any person is aggrieved by any action on the ground that he is being victimized due to the fact that he had filed a complaint or disclosure, he may file an application before the Reviewing Authority.

6. DISQUALIFICATIONS FROM PROTECTION

- I. Protection under the Policy would not mean protection from departmental action arising out of false or bogus disclosure made with malafide intention or complaints made to settle personal grievance.
- II. Whistle Blowers, who make any disclosures, which have been subsequently found to be malafide or frivolous or malicious shall be liable to be prosecuted and appropriate disciplinary action will be taken against them under Service Rules/ bipartite settlements only when it is established that the Complaint has been made with intention of malice.

- III. This policy does not protect an employee from an adverse action which occurs independent of his disclosure under this policy or for alleged wrongful conduct, poor job performance, any other disciplinary action, etc. unrelated to a disclosure made pursuant to this policy.

7. MECHANISM FOR ACTION/REPORTING ON SUCH DISCLOSURES

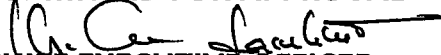
- I. The designated official shall, on receipt of the complaint, arrange to verify the identity of the Whistle Blower.
- II. Proper record will be kept of all disclosures received. The action taken against each disclosure will be also noted and put up to the Reviewing Authority within 7 days of receipt of complaint.
- III. Only on being satisfied that the disclosure has verifiable information, necessary enquiry / investigation will be done with regard to the complaint. The Designated Official will also have the authority to seek the assistance / support from other departments/ offices to conduct enquiry / investigation. The process of investigation will be completed within 45 days of receipt of the Complaint.
- IV. The identity of the Whistle Blower will not be disclosed to the officials conducting the enquiry / investigation. In case additional information is required to be collected from the Whistle Blower, it will be through the Designated Official.
- V. Any inquiry/ investigation conducted against any Subject shall not be construed by itself as an act of accusation and shall be carried out as a neutral fact finding process, without presumption of any guilt.
- VI. The inquiry/ investigation shall be conducted in a fair manner and provide adequate opportunity for hearing to the affected party and a written report of the findings should be prepared for submission.
- VII. A time frame of maximum 45 days will be permitted to complete the investigation / enquiry. In case the same cannot be completed within the stipulated period, the Reviewing Authority may allot further time by recording reasons.

- VIII. Depending upon the nature of disclosure and its gravity, the Designated Official will take a view to take up investigation on a priority basis and fix shorter time frame for its completion.
- IX. In case the disclosure made does not have any specific & verifiable information, the Designated Official will be authorized not to take any action. This would be suitably recorded and placed before the Reviewing Authority.
- X. In case the allegations made in the disclosure are substantiated, appropriate departmental action as per the provisions of service conditions in vogue will be taken against the employee (officer/award) concerned on whose part the lapses are observed.
- XI. The action taken against the subject/employee as stated in the above paragraph will be in addition to any other action or prosecution which may be initiated against said subject/employee under any statute or law in force.

8. REVIEW OF THE POLICY

The Board will review the Policy every year and suggest modifications as warranted.

SUBMITTED FOR APPROVAL


CHIEF EXECUTIVE OFFICER