

WHISTLE BLOWER POLICY

1 OBJECTIVE

As a part of handling complaints, maintenance of Corporate Governance and towards achieving greater transparency, 'Whistle Blower Mechanism' is being put in place to enable our staff members to report unethical practices, frauds, if they observe in any operational area. The policy has been put in place to provide a framework to employees to act as whistle blowers. It aims to protect such whistle blowers wishing to raise a concern about any allegations of corruption or misuse of office that could jeopardize the interest of the Bank.

2 PROCEDURE TO BE FOLLOWED BY WHISTLE BLOWERS:

- i. The employees of the Bank may make a written complaint to the 'Designated Authority'
- ii. The complaint shall be in a closed/secured envelope and should be addressed to the General Manager, Personnel and Human Resources Division (PHRDD), Head Office, who is the "Designated Authority" at the following address:

**The General Manager
PHRDD, Karnataka Vikas Grameena Bank
Head Office Dharwad- 580008**

3 ROLES AND RESPONSIBILITIES:

Procedure for handling of complaints:

- i. The 'Designated Authority' i.e. General Manager, PHRDD, HO, shall authorize an officer not below the level of Chief Manager of PHRDD, HO for receiving complaints.
- ii. The envelope shall be super scribed with "Complaint under the Whistle Blower Mechanism". If the envelope is not super scribed as mentioned above, it will not be possible to protect the complainant under the above mechanism and the complaint will be dealt with as a normal complaint. The complainant shall give his/her name and address, telephone number, email id, in the beginning or end of the complaint or in an attached letter. The disclosure or complaint shall contain, as full particulars as possible and shall be accompanied by supporting documents or other materials.
- iii. All such envelopes will be opened by an authorized official (i.e., Chief Manager in PHRDD) in presence of the designated authority i.e., General Manager, PHRDD.

- iv. The identity of the complainant would be confirmed by the Chief Manager in PHRDD so authorized, by writing a letter to him/ her. Sample of the letter is in Annexure.
- v. The Whistle Blower/ Complainant will be required to confirm within 30 days of receipt of letter that he had sent the complaint and also confirm/ certify that he had not made similar/ identical allegations of corruption/ misuse of office to any other authority to qualify as a “Whistle Blower” complainant. While sending such confirmation, the envelope should be super scribed with “Complaint under the Whistle Blower Mechanism”. If the envelope is not super scribed as mentioned above, it will not be possible to protect the complainant under the above mechanism and the complaint will be dealt with as normal complaint.
- vi. After the identity is confirmed, the Chief Manager of PHRDD so authorized will ensure that the identity of the complainant is removed from the body of the complaint and the dummy complaint is given a number with which the original complaint can be traced back. Further action on complaint will be initiated as per Bank norms.
- vii. The original complaint would be kept in a safe/almirah duly ensuring dual custody. The custody of the almirah will remain with the Chief Manager so authorized and at no point of time the complaint can be accessed except Authorized/ Designated Authority.
- viii. The dummy complaint so made would be submitted to the 'Designated Authority' who would take the decision whether the matter requires to be looked into further and report is to be called in the matter from the respective Regional Offices. (Separate file may be maintained for complaints under Whistle Blower Mechanism).
- ix. **While considering the complaints the “Designated Authority” would take no action on complaints relating to administrative matters like recruitment, promotion, transfers and other related issues.**
- x. In such cases, where a decision has been taken to call for a report, a maximum time limit of 2 weeks may be given. In case no reply is received within two weeks, a reminder should be sent at the level of the Authorised Person. If no reply is still received, the second reminder after 2 weeks should be sent at the level of the “Designated Authority”. If no reply is still received, the "Designated Authority' may call for an explanation and recommend administrative action for deliberate delay.
- xi. On receipt of the report, the concerned Chief Manager of PHRDD so authorized will put up the matter to the 'Designated Authority'. The Designated Authority may take a call on the matter and take appropriate action as per Bank norms.
- xii. In case of serious complaints of irregularities, the Designated Authority shall order a detailed investigation into the matter.

- xiii. On receipt of the Investigation Report, the same shall be scrutinized by Internal Advisory Committee (IAC) constituted as per Staff Accountability Policy for initiating further action in the matter.
- xiv. Meanwhile, the "Designated Authority" shall ensure that no punitive action is taken by any concerned Administrative authority against any person on perceived reasons/suspicion of being "whistle blower".
- xv. The Chief Manager so authorized shall maintain a separate list for the complaints received under the Policy and enter the information in the computer system and monitor their progress periodically and put up the same to the 'Designated Authority every 2 weeks.
- xvi. Wherever the complainant has alleged victimization/ harassment the "Designated Authority" shall ensure that if the identity of the complainant somehow becomes known, he/she should not be harassed/ victimized by way of frequent transfers etc.

4 DISQUALIFICATIONS:

- i. While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection will warrant appropriate action/ disciplinary action. Protection under this policy would not mean protection from disciplinary action arising out of allegations made by the Whistle Blower which are found to be false or bogus or done with a malafide intention.
- ii. Pursuant to a complaint, if the investigation reveals the involvement of the Whistle Blower himself/ herself in the act and /or irregularity, no protection including that of non-disclosure under this policy shall be available to the Whistle Blower under any circumstances and he/she shall be liable to be proceeded against as per norms, for his/her involvement in the act and / or irregularity.

5 REVIEW OF FUNCTIONING OF THE WHISTLE BLOWER MECHANISM/ REPORTING STRUCTURE/ MONITORING:

A quarterly report with the number of complaints received under this Policy by PHRDD along with the outcome shall be placed before the Audit Committee of the Board.

6 PUBLICATION:

The Policy will be posted on the Bank's website and Intranet.

7 OPERATION:

This policy shall be in force till such time it is repealed.

8 GENERAL PROVISIONS/EXCEPTIONS:

- i. Anonymous/ pseudonymous complaints will not be entertained.
- ii. The text of the complaint should be carefully drafted so as not to give any details or clue as to the identity of the whistleblower. However, the details of the complaint should be specific and verifiable.
- iii. The identity of the complainant will not be revealed unless the complainant himself/ herself has made the details of the complainant either public or disclosed his/ her identity to any other office or authority.
- iv. The Designated Authority shall not entertain or inquire into any disclosure in respect of which a formal inquiry has been ordered under Karnataka Vikas Grameena Bank (Officers and Employees) Service Regulations-2010, or any such disclosure which is subjudice or being enquired by law enforcing agencies.

CONFIDENTIAL

Speed post/ Registered post

To,

Sir/Madam,

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Please refer to your complaint dated..... received onunder
“Whistle Blower Policy”.

As per policy, a complainant is required to confirm that he/she has actually sent the said complaint to the Bank. You are, therefore, requested to confirm within 30 days of receipt of this letter, that you have sent the above mentioned complaint.

You are also requested to furnish a certificate to the bank as per format enclosed that you have not made similar/identical allegations of corruption/misuse of office to any other authorities to qualify as a “Whistle Blower” complainant.

The reply may be addressed to the undersigned by me.

Yours faithfully,

CHIEF MANAGER (PHRDD)

Encl: Certificate

CERTIFICATE

It is certified that I have not made similar/identical allegation of corruption/misuse of office to any other authorities to qualify as a “Whistle Blower” complainant.

Date:

Signature

Name of the Complainant:

Address: