



GP PARSIK SAHAKARI BANK LTD

(Multi-State Scheduled Bank)

Whistle Blower Policy

1. Preface

- The GP Parsik Sahakari Bank Ltd believes the conduct of its users should be fair and transparent. They are to work adopting highest standards of professionalism, honesty, integrity with proper ethical and moral behaviour.
- The bank has laid down the principles and standards that would govern the actions of the users.
- Any actual or potential violation of the standards, howsoever insignificant or perceived as such, would be a matter of serious concern for the bank.
- The role of the users in pointing out such violations cannot be undermined. Every user of the bank shall promptly report to the management any actual or possible violation or an event they become aware of that could materially/adversely affect the business, reputation of the bank, financial irregularities, organizational interpersonal relationship and immoral behaviour."
- Accordingly, this Whistle Blower Policy ("the Policy") is formulated with a view to provide a mechanism for users to approach the Audit Committee directly.

2. Definitions

The definitions of some of the key terms used in this Policy are given below.

- "Audit Committee" means the Audit Committee constituted by the Board of Directors
- "User" among other things means every regular user's of the bank and includes part timers, probationers, Management Trainees, Temporary users, apprentices, outsourced vendors, suppliers, its customers and shareholders or a well wisher.
- "Investigators" mean those persons authorized by the bank and include the statutory auditors.
- "Protected Disclosure" means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.
- "The Bank" means the GP Parsik Sahakari Bank Ltd.

- "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 a User making a Protected Disclosure.
- "Anonymous whistle blower" mean a person making a Protected Disclosure who does not identify himself or leaves no trail.

3. **Scope**

- The Whistle Blower's role is that of a reporting party with reliable information.
- The protected disclosure should be substantiated by facts, circumstances and evidence as to create reasonable grounds for suspicion that the interest of the bank is likely or being compromised.
- They are not required or expected to act as investigators or finders of facts, nor would they determine the appropriate corrective or remedial action that may be warranted.
- Whistle Blowers would not act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by the Audit Committee or the Investigators.
- Protected Disclosure will be appropriately dealt with by the Audit Committee.

4. **Eligibility**

All Users of the Bank are eligible to make Protected Disclosures under the Policy. The Protected Disclosures may be in relation to matters relating to the bank or the personal conduct of user/s.

5. **Disqualifications**

- While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.
- Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention.

6. **Procedure**

- All Protected Disclosures should be addressed to the Chairman and the Vice Chairman of the Audit Committee of the bank in a sealed cover marked "whistle-blower" or "CONFIDENTIAL" or by email. The contact details for the same are as whistleblower@gpparsikbank.net The same would be available on the website of the bank.
- Protected Disclosures should preferably be reported in writing so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English, Hindi or in the regional language of the place of employment of the Whistle Blower.

- The Chairman of the Audit Committee shall detach the covering letter or take a print of the email (sans the name of the whistleblower) and discuss the Protected Disclosure with Members of the Audit Committee and if deemed fit, forward the Protected Disclosure to the Audit Department of the Bank for investigation.
- Protected Disclosures should be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.

7. Investigation

- The Chairman and the Vice Chairman (VC) will take decision for onward action on the protected disclosure based on the perceived merits. The Protected Disclosures needing further investigation will be investigated by the nominee appointed by the Audit Committee Chairman/VC.
 - The investigator can either be an independent outside agency or an employee of the bank not be lower than the rank of Senior Manager and may rise in rank depending upon the subject being investigated.
 - The investigator will investigate / oversee the investigations under the authorization of the Audit Committee and in absolute confidence deal about the matter.
 - Protected Disclosures which in the opinion of the Audit Committee may hamper the independence of the investigation will be investigated by the Audit Committee itself or by its nominee.
 - The Investigator may at its discretion, consider involving any other Investigators for assistance.
 - The investigator is expected to be discreet, unbiased, factual and conclusive. The investigation process should not disclose or create suspicion or cast aspersion on any of the subjects.
 - The decision to conduct an investigation taken by the Audit Committee is by itself not an accusation and is to be treated as a neutral fact-finding process.
 - The outcome of the investigation may not support the conclusion of the Whistle Blower that an improper or unethical act was committed.
 - The identity of the whistle blower and the subject should be kept confidential to the extent possible given the legitimate needs of law and the investigation.
 - Subjects may be called upon at the outset of a formal investigation (if need be) and will be given an opportunities for providing inputs during the investigation.
 - Subjects shall have a duty to co-operate with the investigator/ Audit Committee to the extent that such co-operation sought does not merely require them to admit guilt.
 - Subjects have a right to consult with a person or persons of their choice.
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- Subjects shall be free at any time to engage counsel at their own cost to represent them in the investigation proceedings.
 - Subjects have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced,

coached, threatened or intimidated by the Subjects.

- Unless there are compelling reasons not to do so, Subjects will be given the opportunity to respond to material findings contained in an investigation report. No allegation of wrong doing against a Subject shall be considered as maintainable unless there is good evidence in support of the allegation.
- Subjects have a right to be informed of the outcome of the investigation. If allegations are not sustained, the Subject should be consulted as to whether public disclosure of the investigation results would be in the best interest of the Subject and the bank.
- The investigator and all the users in the know of the investigation are to act in confidentiality and should not compromise the name of the subject by actions, deeds, innuendos, leading questions or in suggestive ways.
- The investigation shall be completed normally within 45 days of the receipt of the Protected Disclosure.

8. Protection

- No unfair treatment will be meted out to the Whistle Blower by virtue of his/her having reported a Protected Disclosure.
- The bank as a policy condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers.
- Complete protection will, therefore, be given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/functions including making further Protected Disclosure.
- If the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, bank will arrange for the Whistle Blower to receive advice about the procedure, etc.
- The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law. Whistle Blowers are cautioned that their identity may become known for reasons outside the control of the bank. (e.g. during investigations carried out by Investigators).
- Any other User assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.

9. Investigators

- Investigators are required to conduct a process towards fact-finding and analysis. Investigators shall derive their authority and access rights from the Audit Committee when acting within the course and scope of their investigation.
- Technical and other resources may be drawn upon as necessary to augment the investigation. All Investigators shall be independent and unbiased both in fact and as perceived. Investigators have a duty of fairness, objectivity, thoroughness, ethical behavior, and observance of legal and professional standards.
- Investigations will be launched only after a preliminary review which establishes that:

- the alleged act constitutes an improper or unethical activity or conduct, and
- either the allegation is supported by information specific enough to be investigated, or matters that do not meet this standard may be worthy of management review, but investigation itself should not be undertaken as an investigation of an improper or unethical activity.

10. Decision

If an investigation leads the Audit Committee to conclude that an improper or unethical act has been committed, it shall direct the management to take such disciplinary or corrective action as is governing/applicable for breach under the appropriate HR Policies laid under the ISMS policies/governing service rules as applicable to all the users. The actions under the HR policies would not preclude the bank from taking simultaneous or further actions under the laws of the land if the breach is found to be contravening the legal/regulatory requirements.

11. Reporting

The Investigator shall submit a report to the Audit Committee on a regular basis about all Protected Disclosures referred to him/her since the last report together with the results of investigations, if any.

12. Retention of documents

All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Bank for a minimum period of 10 years.

13. Amendment

The bank reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Users unless the same is notified to the Users.

14. Classification of Policy.

The policy will be classified as a public document and would be displayed on the bank's internet website, intranet website and branch document available to the general public.

15. Training and awareness

The bank would also educate, create awareness and training curriculum for all users.

16. **Review of Policy**

Whistle Blower Policy will be reviewed on annual basis.