

**Shree Warana Sahakari Bank Ltd. Warananagar.**

**Taluka: Panhala, District: Kolhapur.**

**Whistle Blower Policy**

**I. PREAMBLE**

To safeguard the Bank against internal / external threats like frauds, bribery, corruption, abuse of authority, non-compliance with laid down systems & procedures etc. involving financial and reputational implication, constant vigilance at all levels is necessary through a process called 'participative vigilance' where each and every employee/director has certain role-play and is duty bound to execute the same. The staff members/directors are appealed not to be silent spectators to any wrong doing in the branch / office but to report the same to the higher authority/authority concerned. The same is intended to ensure that a few unscrupulous staff members are not vitiating the overall atmosphere / work culture and putting the Bank's interest and reputation in jeopardy.

It is also observed that these acts do not take place overnight but are being carried out / perpetrated over a period of time. It is unlikely that such acts could escape the knowledge of other colleagues working in the Branch / Office. Had such instances of frauds, bribery, corruption, abuse of authority, non-compliance with laid down systems and procedures etc. been brought to the notice of the higher authorities/ authorities concerned in time, further damage could have been avoided.

Staff members/directors, many a time, are hesitant to come forward and report to higher authorities about wrongdoings, mishaps around them fearing disclosure of identity and probable retribution / victimization from the official/s concerned. In order to instill confidence in the staff members/directors as well as to prevent the mishap at the initial stage itself, a need was felt for introduction of 'Whistle Blower Policy' which will lead to ensure more effective Corporate Governance.

**II. SCOPE AND COVERAGE**

- i. Under the Policy all employees of the Bank, depositors/borrowers/ shareholders/public having sufficient grounds for concern can lodge the complaints. The complainant would be referred to as the 'Whistleblower'.
- ii. These complaints can pertain to the acts of omission and commission by any of the employees of any of the branches / Departments /Office.

**III. MAIN FEATURES OF THE POLICY**

The Policy is intended to cover the following serious and sensitive concerns :

- i. acts that are unethical / immoral / illegal.
- ii. actions that would amount to serious improper conduct.
- iii. actions that may lead to / has lead to financial frauds / incorrect and misleading financial reporting.
- iv. actions that are in contravention of the various policies / rules framed by the regulators / the Bank from time to time.

#### IV. PROCEDURE FOR MAKING COMPLAINT UNDER 'WHISTLE BLOWER'

The detailed procedure to be followed by the complainant for lodging the complaint under 'Whistle Blower' category is as under :-

1. For lodging the complaint off line (i.e. in physical form)
  - i. The complaint should be in a closed / sealed envelope
  - ii. The envelope should be addressed to the Chairman / Chief Executive Officer of our Bank and should be super scribed 'Complaint under Whistle Blower Policy'.

If the envelope is not super scribed and not closed, it will not be possible for the Chairman / Chief Executive Officer of our Bank to protect the identity of the complainant and the complaint will be dealt with as per the normal complaint handling policy. The complainant should give his / her name and address in the beginning or at the end of the complaint or in separately attached letter.

- iii. The complaint should be signed by the complainant at the end of the complaint after leaving some place. The Chairman / Chief Executive Officer of our Bank will not entertain any anonymous/ pseudonymous complaint, however, try to verify the seriousness of the complaint.
  - iv. The text of the complaint should be carefully drafted so as not to indicate any details or clue as to identity of the complainant. However, the details of the complaint should be specific and verifiable.
  - v. In order to protect the identity of the complainant, the Chairman / Chief Executive Officer of our Bank will not issue any acknowledgement and the whistle blowers are advised not to enter into any further correspondence with the Chairman / Chief Executive Officer of our Bank in their own interest. The Chairman / Chief Executive Officer of our Bank assures that subject to the facts of the case being verifiable, necessary action will be taken as provided in this policy. If any further clarification is required, the Chairman / Chief Executive Officer of our Bank will get in touch with the complainant.
2. For lodging the complaint on-line via email ID – [info@waranabank.com](mailto:info@waranabank.com). The Bank has created an email ID - [hr@waranabank.com](mailto:hr@waranabank.com) to facilitate lodging of complaints under 'Whistle Blower' category. The access rights to view the complaints coming to this email ID under 'Whistle Blower' category are restricted only to the designated authorities i.e. Chairman/Chief Executive Officer of our Bank. It is appealed that the complaints be preferably lodged via this email id. Bank will ensure protecting the identity of the complainant as well as confidentiality of the contents since it will be handled by designated authorities i.e. Chairman/Chief Executive Officer of our Bank.

## V. ROLE OF THE CHAIRMAN/CHIEF EXECUTIVE OFFICER OF OUR BANK.

- i. The Chairman/Chief Executive Officer of our Bank will be designated authorities to receive written complaints made by any officials/ employees/directors of our Bank.
- ii. The Chairman/Chief Executive Officer of our Bank., as the designated authorities, will ascertain the identity of the complainant. If the complaint is anonymous / pseudonymous, the authority shall not take any action in the matter; however, try to verify the serious of the complaint.
- iii. The identity of the complainant will not be revealed unless the complainant himself has made either the details of the complaint public or disclosed his identity to any other office or authority.
- iv. If the allegations made in the complaint referred to the Chairman of our Bank are specific and verifiable then he/she will refer the same to the Chief Executive Officer for further action. As regards the complaints made to Chief Executive Officer, he/she will take further action in the matter. The Chief Executive Officer will order investigation into the complaint and will obtain all the relevant papers / documents in respect of the matter raised in the complaint. While calling for preliminary inquiry/investigation report, the Chief Executive Officer will not disclose the identity of the complainant. The Chief Executive Officer shall also advise the authority/ies from whom such report/s is/are sought to keep the identity of the complainant as secret, even if for any reason/s, the said authority/ies comes to know the identity of the complainant.

In spite of the directions of the Chief Executive Officer to protect the identity of the complainant, if the identity of the complainant gets disclosed, the Chief Executive Officer is authorized to recommend appropriate action against the authority/person responsible for making such disclosures.

- v. If any Director / Official is aggrieved by any action on the ground that he is being victimized due to fact that he had filed a complaint, he may file an application before the Chairman / Chief Executive Officer of our Bank seeking redressal in the matter. Chairman of our Bank / Chief Executive Officer will ensure that no punitive action is taken by any concerned authority against any person on perceived reasons / suspicion of being "Whistle Blower".
- vi. In case the Chief Executive Officer finds the complaint to be motivated or vexatious, he/she shall be at liberty to initiate appropriate action against such complainant.
- vii. After conducting investigation, if it reveals that there was misuse of office and / or substance in the allegations of corruption, the Chief Executive Officer shall recommend appropriate action which shall inter-alia include following :

- a. Appropriate proceedings against the concerned staff member,
  - b. Recommend to appropriate authority / agency for initiation of criminal proceedings in suitable cases, if warranted, by facts and circumstances of the case,
  - c. Recommend corrective measures to prevent recurrence of such events in future.
- viii. In case a complaint results in detection of unethical practices/abuse of authority/fraud/other wrong doings and thereby averts or minimizes the financial/reputational loss to the Bank, the moral courage shown by the whistle blower (in staff) will be recognized by the Bank by way of appropriate indirect incentive / benefits. Towards this end, the Chief Executive Officer will ensure along with the General Manager/(HR & ADMIN) that such genuine informants are given due weightage in career growth and placement as deemed fit. A dossier will be personally maintained by the General Manager/(HR & ADMIN) in strict confidence for the purpose. The Chief Executive Officer will ensure full protection against disclosure of identity of the whistle blower.
- VI. This policy is prepared for the financial year 2022-2023 and same shall be effective /operative till the new policy is approved. This policy is approved by Hon Board of Directors vide resolution number 46 in its meeting dated 06-04-2022.

**Shree Warana Sahakari Bank Ltd;**

**Rajesh P Sardal**  
**Chief Executive Officer**

**PROCESS FLOW (WHISTLEBLOWER POLICY)**

