

## WHISTLE BLOWER POLICY

### 1. OBJECTIVE

**TJSB Sahakari Bank Ltd.** is committed in maintaining the highest standards of ethics, integrity and build a great foundation of long-lasting framework of Corporate Governance in its business operations. The Bank expects that all its employees and other stakeholders having business relations with the Bank should maintain the similar standards of high ethics and integrity in their dealing with the Bank. In its simplest form, the policy involves reporting of wrongdoing within an organisation either internal or external parties. With the implementation of this policy, Bank is establishing an internal mechanism for internal or external parties of the Bank to report to the management of the Bank their concerns about suspected statutory violations, concerns about unethical behavior, actual or suspected fraudulent or irregular conduct of an employee or of a person having business relations with the Bank, violation of the Code of Conduct or any other policy of the Bank.

This policy encourages all the employees of the Bank and other persons having business relations with the Bank to bring forward any such concern to the notice of the Management without any fear of retaliation that has potential risk of damaging the reputation of the Bank or may expose the Bank to any other risk including regulatory or legal risk. This policy provides necessary safeguards to the employees as well as other relevant persons who will bring forward the irregularities or violate/malpractices and or any other misdemeanors. However, no person should use the process contained in this policy to address any personal grievances.

### 2. NAME OF THE POLICY

This policy shall be called as the “Whistle Blower Policy”.

### 3. APPLICABILITY

This policy applies to all the employees of the Bank, Depositors, Borrowers, Stakeholders of the Bank.

### 4. DEFINITIONS

In this policy unless the context otherwise requires-

**Whistle Blower-** Means the employee of the Bank or any other person having business relations with the Bank making the disclosure under this policy.

- a. **Employee-** Exclusively for the purpose of this policy, “Employee” means a person employed by the Bank in the services of the Bank in the capacity of permanent, probationer.
- b. **Disclosure** – Means any communication, whether by letter or email relating to unethical practice, fraudulent activities, or violation of service rules as mentioned in clause 5 of this policy which is made in good faith by the Whistle Blower.
- c. **Ombudsperson** – The Ombudsperson will be Senior Executive with proven track record and well respected for his / her independent view towards issues.
- d. **Investigators/Investigation Committee-** Investigators or Investigation Committee means any person(s) duly authorized, appointed by the Chairman of the Audit Committee or Managing Director and CEO of the Bank and includes the auditors of the Bank to conduct an investigation under this policy and wherever the report of any breaches have been notified to the external government authorities includes such authority.
- e. **Disciplinary Authority-** The disciplinary authority will be as per the service rules of the Bank. Wherever the complaint is made against the Managing Director and CEO of the Bank, the Board of Directors will act as the disciplinary authority.
- f. **Stakeholders-** Means any customers, suppliers, service providers or shareholders having business relationship with the Bank.

## 5. ILLUSTRATIVE EXAMPLES OF VIOLATIONS, BREACHES OR WRONGDOING

Employees and other stakeholders can disclose / escalate acts related to fraud, corruption, statutory violations, or any other misconduct that they are aware of or comes to their attention or of which they have genuine suspicion of occurrence. The act may have occurred in the past, ongoing or is being planned. Illustrative examples of such acts include the following:

- a. Fraudulent or unethical conduct.
- b. Unlawful conduct which is a violation of any of the law in force.
- c. Abuse of authority in a manner that compels employees or stakeholders to commit breaches or violation of law, internal rules, or practices.
- d. Demand of greased payment, bribery, corruption.
- e. Failure to comply with statutory obligations or regulatory requirements.
- f. Breach of Code of Conduct of the Bank or any other policy.
- g. Acts resulting in financial loss or loss of reputation of the Bank.
- h. Collusive practices.

- i. Any other activities which have potential of causing reputational, regulatory, or legal risk to the Bank.

#### **6. APPOINTMENT OF OMBUDSPERSON & ALTERNATIVE OMBUDSPERSON**

The powers to appoint Ombudsperson and alternative Ombudsperson is delegated to MD & CEO.

#### **7. REPORTING AUTHORITY**

Employees and other stakeholders can report any such acts as mentioned in clause No. 5 by a written letter or by an email to Ombudsperson on [whistleblower@tjsb.co.in](mailto:whistleblower@tjsb.co.in)

#### **8. REPORTING MECHANISM/INFORMATION**

To facilitate the reporting process, the employee or other stakeholder who intends to make a disclosure should provide the necessary information such as their Name, Employee Code No. (If he / she is employee), Branch, Department, Contact Number, address, email address etc. The disclosure should provide the names of the Person(s)-in-question and contain specific details and factual information to support the act(s) of wrong-doing or breaches. Although the person making the disclosure is not expected to prove the allegation, at the minimum, some facts and evidence in support of the complaint should be provided.

The Bank shall make every Endeavor to protect the identity of the person who has made the disclosure. However, it is made clear that there could be certain situations beyond the control of the Bank which may reveal the identity of the person during the investigation process or if and when the same is mandated to the Bank due to regulatory process.

#### **9. ANONYMOUS COMPLAINT**

As mentioned in clause No. 8, the employee or other stakeholder who is making the disclosure should provide the details of his/her identity, contact numbers, address etc. to enable the Bank Ombudsperson or Investigation Committee to obtain additional information if required.

In case, the identity is not disclosed, the complaint will be treated as anonymous and based on the details available in the complaint, Bank will investigate further.

#### **10. INVESTIGATION PROCESS**

Wherever deemed appropriate and backed by some relevant information or data or evidence, all disclosures reported under this Policy will be investigated in a diligent manner. The investigation will be carried out either by the Ombudsperson or by a committee nominated by the Chairman of the Audit Committee. If the allegations are against any

members of the Audit Committee or against the Managing Director & CEO of the Bank, they shall recuse themselves (concern people) from appointing the investigators or the investigation committee. In this scenario, other board members of the Bank will appoint the appropriate investigation committee.

- a. The decision to investigate any disclosures would be a neutral fact finding process. In case the disclosure made does not have any specific & verifiable information, the Ombudsperson will be authorized not to take any action.
- b. The investigators or the investigation committee may adopt a process of investigations completely at their discretion which may include interaction with Whistle Blower, witnesses, person against whom the allegation is made and examining documents, data, electronic systems, visiting relevant places/premises etc.
- c. During the investigation process the investigators or the investigation committee may seek additional inputs/information from the Whistle Blower to aid the investigation.
- d. The identity of the Whistle Blower will be kept confidential to the extent possible given the legitimate needs of law and the investigation.
- e. Whistle Blower shall have a duty to cooperate with the Investigators during investigation.
- f. The person against whom the allegation is made or are made is required to maintain complete confidentiality. He or she will be offered every opportunity of putting forward his or her defense.
- g. The person against whom the allegation is made will not interfere with the investigation in any form that including influencing the witnesses in coercive or detrimental manner or will not destroy or tamper the evidence in any manner.
- h. The frequency of contact between the complainant and the body investigating the matter will depend on the nature of the issue and the clarity of information provided. Further information may also be sought from him / her.
- i. Based on a thorough examination of the findings, the Ombudsperson / the committee will prepare a report of the findings which would also recommend an appropriate course of action.
- j. Appropriate administrative steps will be taken for redressing the loss, if any, caused to the Bank, as a result of the corrupt act or misuse of office, or any other offence covered by the policy.

- k. Depending upon the outcome of the investigation, the Bank Management may in its discretion share the outcome of the investigation with Whistle Blower.
- l. The Bank shall endeavor to complete the investigations in an expeditious manner.
- m. In case the allegations made in the disclosure are substantiated, the Bank shall initiate appropriate departmental action as per the provisions of the service rules which are applicable to the employee against whom the allegations are made.
- n. The action taken against the employee as stated in the above paragraph will be in addition to action or prosecution initiated against said employee under any law which is in force by the Bank.

#### **11. NON-RETALIATION**

Whistle-blowers shall be protected from any disciplinary or retaliatory action from the Bank regardless of the outcome/action arising from the investigation if the Whistle Blower has made the disclosure in good faith, believes that his or her allegation is substantially true, it is not a frivolous or malicious allegation and is not initiated with an intention of seeking any personal advantage or gain.

The Bank shall initiate appropriate disciplinary action against the employees who will act in defiance to this clause.

#### **12. MISUSE/ABUSE OF THE POLICY**

Whistle Blower should ensure that they shall not misuse or abuse the terms of this policy to bring forward frivolous, groundless or any other grievance of personal nature. Any employee or other stakeholder who is found to be misusing the policy, the Bank shall be justified in initiating appropriate disciplinary action against the employee or termination of the business relationship with other stakeholders. Wherever the Whistle Blower himself or herself is the party to any violation provided in clause 5, the terms of this policy will not automatically grant any immunity to such person/s.

#### **13. POLICY COMMUNICATION**

The Bank shall communicate this policy with all the employees and other stakeholders through internal channels of communication. A copy of this policy will also be uploaded on the Bank website as well.

#### 14. RESPONSIBILITIES & ACCOUNTABILITY

<b>Employees / Depositors</b>	Avoid anonymity when raising a concern.
<b>Borrowers / Stakeholder</b>	Bring to early attention of the Bank any improper practice they become aware of.
	Cooperate with the investigating authorities in maintaining full confidentiality
	The intent of the policy is to bring genuine and serious issues to the fore, and it is not intended for petty complaints. Malicious allegations by employees may attract disciplinary action.
	A complainant has the right to protection from retaliation. But this doesn't extend to immunity for complicity in the matters that are subject of the allegations and investigations.
	In exceptional cases where the complainant is not satisfied with the outcome of investigation carried out by the Ombudsperson, he / she can make a direct appeal to Chairman of the Bank.
<b>Ombudsperson and Alternative Ombudsperson</b>	Ensure the policy is being implemented in the true spirit
	Ascertain prima facie the credibility of the charge. If initial enquiry indicated that further investigation is not required, close the issue.
	Document the initial enquiry
	Ensure that necessary safeguards are provided to the complainant.
	Provide quarterly reports to the Managing Director regarding the complaints received and status thereof.
<b>Investigation Committee</b>	Conduct enquiry in a fair, unbiased manner.
	Ensure complete fact-finding
	Maintain strict confidentiality
	Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom.
	Recommend an appropriate course of action, suggest disciplinary action, including dismissal and preventive measures.
	Minute the deliberations in the meetings and document the final report
<b>Managing Director</b>	To place quarterly report from Ombudsperson

	before Board of Directors and PHRC
	Ensure necessary implementation of the recommendations of the Ombudsperson / Investigation Committee.
<b>Subject of Investigation</b>	Provide full cooperation to the investigation team.
	Be informed of the outcome of the investigation.
	Accept the decision of the Ombudsperson and/or Investigation Committee.
	Maintain strict confidentiality
<b>Time Frame (TAT)</b>	As far as possible all concerns raised by the complainant (whistleblower) should reach a logical conclusion within 90 days, depending on the process of investigation and implementation of the action, if the concerned raised is proved.

#### 15. REVIEW OF THE POLICY

The Bank shall review this policy from time to time depending upon any legislative or regulatory change or as per the discretion of the Bank.

The policy will continue to remain in force till modifications / amendments are recommended by the Committee.

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#### ANNEXURE I

#### OMBUDSPERSON CONTACT DETAILS

OMBUDSPERSON: Ms. Rini Deepshankar Ghosal, DGM, Human Resource Development

ALTERNATIVE OMBUDSPERSON: Ms. Asmita Nitin Sule, AGM, Chief Compliance Officer

Email ID: [whistleblower@tjsb.co.in](mailto:whistleblower@tjsb.co.in)