



THE PRATAP CO-OP. BANK LTD.

WHISTLE-BLOWER POLICY

## **1. Preamble**

Whistleblowing involves the reporting of wrongdoing within an organization, either to internal or external parties. This policy aims to protect the public interest by encouraging employees and stakeholders to disclose any fraudulent, illegal, or unethical behaviour within the Bank. The policy aligns with global practices and is developed in compliance with the guidelines from regulatory authorities like the Reserve Bank of India (RBI) and the Central Vigilance Commission (CVC).

## **2. Objective**

The objectives of this Whistle-blower Policy are:

- To provide employees, depositors, borrowers, and stakeholders an avenue to report concerns regarding corruption, misuse of office, criminal offenses, suspected fraud, and other unethical conduct.
- To ensure that Whistle-blowers can report concerns without fear of retaliation.
- To promote transparency and accountability within the Bank by enabling the investigation of allegations.

## **3. Scope and Coverage**

- Eligible Whistle-blowers: This policy applies to all employees, depositors, borrowers, shareholders, and the general public who have sufficient grounds for concern. The person raising the concern is referred to as the "Whistle-blower."
- Types of Concerns Covered: Complaints under this policy can relate to acts of omission or commission by any employee of the Bank that lead to financial fraud, corruption, violation of laws, or any action that harms the Bank's reputation or interests.

## **4. Reporting Mechanism**

- Ombudsperson: The Bank appoints an Ombudsperson, who is a senior employee with a proven track record of integrity and independence. The Ombudsperson is responsible for receiving and investigating complaints under this policy.
- Reporting Process:
  - Confidential Submission: Complaints should be submitted in a sealed envelope addressed to the Ombudsperson at The Pratap Co-operative Bank Ltd., A/203, Shreepati Aradhana Building, Bhuleshwar Road, Bhuleshwar, Mumbai 400 002.

- Acknowledgment: The Ombudsperson will acknowledge receipt of the complaint and ensure it is logged for investigation.
- Anonymous Complaints: Generally, anonymous complaints will not be entertained unless the matter is of a serious nature, in which case the Ombudsperson may proceed with an investigation.

## **5. Investigation Process**

- Initial Review: The Ombudsperson will conduct a preliminary review to determine if the complaint has merit. If not, the complaint may be dismissed, and this decision will be documented.
- Detailed Investigation: If warranted, a full investigation will be conducted. This may involve appointing a committee by the Chairman/Board to assist in the investigation.
- Confidentiality: The identity of the Whistle-blower will be protected throughout the investigation process, and the investigation will be conducted impartially without any presumption of guilt.
- Final Report: The Ombudsperson or the investigating committee will prepare a report of findings and recommend appropriate action, which may include disciplinary measures against those found guilty.

## **6. Safeguards**

- Confidentiality: Every effort will be made to protect the identity of the Whistle-blower, subject to legal constraints. Disclosure of the Whistle-blower's identity without their consent is prohibited.
- Protection from Retaliation: Harassment, victimization, or any form of retaliation against the Whistle-blower is strictly prohibited. Any employee found guilty of such behaviour will face disciplinary action.
- Protection from Malicious Complaints: Complaints made with malicious intent may result in disciplinary action against the complainant.

## **7. Reporting and Accountability**

- Ombudsperson's Reports: The Ombudsperson will provide quarterly reports to the Chief Executive Officer (CEO), who will present them to the Executive and Administrative Committee of the Board of Directors. These reports will detail the number of complaints received and the status of each.
- Responsibility of Employees and Stakeholders:
  - Avoid anonymity when possible, as it can impede the investigation.
  - Report genuine and serious concerns and refrain from filing frivolous or vexatious complaints.

## **8. Time Frame**

All concerns raised under this policy should reach a conclusion within 60 days, depending on the complexity of the investigation and the actions required.

#### **9. Amendments**

This policy may be amended, modified, or rescinded by the Chairman/Board at any time to ensure its continued relevance and effectiveness.

#### **10. Communication of Policy**

This policy will be communicated to all employees, stakeholders, and the public through internal channels and public notifications. Training sessions will be conducted to ensure that everyone is aware of the policy and the procedure for raising concerns.

Here is the "Responsibility and Accountability" clause, as per the attached PDF, tailored for The Pratap Co-operative Bank Ltd:

#### **11. Responsibility and Accountability**

##### **Employees/Depositors/Borrowers/Shareholders:**

1. Avoid anonymity when raising a concern.
2. Bring to the early attention of the Bank any improper practice they become aware of. Although they are not required to provide proof, they must have sufficient cause for concern.
3. Cooperate with the investigating authorities, maintaining full confidentiality.
4. The intent of the Policy is to bring genuine and serious issues to the fore and it is not intended for petty complaints. Frivolous, motivated, and vexatious complaints should not be submitted. Malicious allegations by employees may attract disciplinary action.
5. A complainant has the right to protection from retaliation. But this does not extend to immunity for complicity in the matters that are the subject of the allegations and investigation.

6. In exceptional cases, where the complainant is not satisfied with the outcome of the investigation carried out by the Ombudsperson, he/she can make a direct appeal to the Chairman of The Pratap Co-operative Bank Ltd.

**Ombudsperson:**

1. Ensure that the Policy is being implemented in the true spirit.
2. Ascertain prima facie the credibility of the charge. If the initial inquiry indicates that further investigation is not required, close the issue.
3. Document the initial inquiry.
4. Where further investigation is indicated, carry this forward, through a Committee if necessary.
5. Acknowledge receipt of the concern to the complainant, thanking him/her for the initiative taken in upholding the standards of the Bank's business conduct.
6. Ensure that necessary safeguards are provided to the complainant.
7. Provide quarterly reports to the Chief Executive Officer with a copy to the Executive and Administrative Committee of the Board of Directors regarding the complaints received and the status thereof.

**Ombudsperson / Committee:**

1. Conduct the inquiry in a fair, unbiased manner.
2. Ensure complete fact-finding.
3. Maintain strict confidentiality.
4. Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom.

5. Recommend an appropriate course of action, suggested disciplinary action, including dismissal, and preventive measures.

6. Minute the deliberations in the meetings and document the final report.

**Chief Executive Officer:**

1. To place the quarterly reports from the Ombudsperson before the Executive and Administrative Committee of the Board of Directors.

2. Ensure necessary implementation of the Recommendations of the Ombudsperson/Committee.

**Subject of Investigation:**

1. Provide full cooperation to the Investigation team.

2. Be informed of the outcome of the investigation.

3. Accept the decision of the Ombudsperson.

4. Maintain strict confidentiality.

The above policy was placed in the board meeting of 23<sup>rd</sup> August 2024. The same was discussed in the meeting and approved by Members.

Chairman