

## **Whistle Blower Policy**

### **1. Introduction & Definition**

We at Dombivli Nagari Sahakari Bank Limited (DNS Bank) in our daily banking business deal with customers, vendors, service providers, walk in customers, shareholders, non-customers, various financial/non-financial institutes including various government agencies.

Our Bank staff while handling these banking business is required to show the conduct of highest standards and must extend and or avail services in strict compliance with the laid down guidelines issued from time to time by the Bank.

While conducting these business transactions, there could be serious violations and or non-observations of the laid down norms by the authority (ies), which he/she might be doing unintentionally or with certain ill motives.

Such breaches of laid down norms even when come to knowledge or noticed by one or more staff members/outsider, the same are not brought to and or not reported to Higher/Appropriate Authorities, for fear of he/she/they may get targeted and or some harm might be done by the **'person(s) against whom such reporting has been made.**

When one or more of such **Staff Members/Outsider(s)** reports such unethical practices/behavior of **'person(s)'**, with good intention/motive to get such misdeeds properly investigated by Higher Authority and take suitable action including bring awareness among all staff to stop any such unethical practices, such staff member(s)/Outsider(s) are called **"Whistle Blower"**.

These 'Well-wisher Staff or Outsider' called 'Whistle Blower' must be given due protection by the Bank, and as such the need for having a **'Whistle Blower Policy', is laid down hereunder:**

### **2. Process**

- Whistle Blower (Staff or outsider) will have to make the complaint (which will be called herein after **'Protected Disclosures'**) in writing under his/her signature giving full facts of unethical practice/misdeeds/misbehavior etc. with



supporting documentary evidences (wherever available) to Chairman of Audit Committee at following address:

Chairman of Audit Committee  
Dombivli Nagari Sahakari Bank Ltd  
'Madhukunj' Plot No. P/52  
MIDC, Kalyan Shil Road  
Sonarpada  
Dombivli (East) 421204

**Protected Disclosures** should be sent in sealed cover marked '**Confidential WB**'.

**Protected Disclosures should be factual and not speculative or in the nature of conclusion, and should contain as much specific information as possible to allow for proper assessment and extent of the concern and the urgency of a preliminary investigative procedure.**

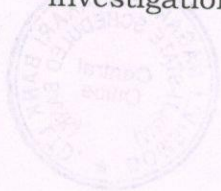
Protected Disclosure should be either typed or written in legible handwriting in Marathi, English or in Hindi and it can also be sent by mail at email address [abhijit.marathe@dnsb.co.in](mailto:abhijit.marathe@dnsb.co.in).

- Chairman of the Audit Committee will discuss the subject matter in Audit Committee and if deemed fit,
- And Taking into account perceived merits of the disclosures, will refer it to Chairman and in absence of Chairman to Vice Chairman (chairperson), who will take final decision for onward action.
- Based on such decision, Chairman of the Audit Committee will forward the Protected Disclosure with all enclosures to Audit Department for further investigation.

### **3. Investigation:**

**Investigation 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.**
- Audit Department after receipt of all the relevant papers/documents, will get the matter investigated by Audit Staff or staff of other department\* (called Nominated Authority) who shall be one scale higher than the 'Person' against whom investigation has to be made.



- In case the subject matter involves special skill/knowledge of a particular department, investigation can also be got done by nominating staff (higher in scale than the 'Person' against whom investigation is being made), from "Investments/IT related/Taxation". Such investigation in special circumstances can also be got done through outside agencies (approved by the Committee).
- Audit Staff/Any other Staff nominated (Nominated Authority) to investigate, shall carry out investigate strictly confidentially, without disclosing/naming the 'Protected Disclosure'.
- For investigating the matter, the Nominated Authority will have the power to meet and or call staff member(s) /outsider whose inputs such authority feels necessary.
- If investigation requires assistance of an outside agency, same may be availed to get the evidences/information to get to the root of the disclosures and come to final conclusion.
- Nominating Authority is expected to be discreet, unbiased, factual and conclusive. The process should not disclose or create suspicion or case aspersion on any of the subjects i.e 'Person(s)' complained against.
- Nominated Authority are required to conduct the process towards fact-finding and analysis.
- Final report of Nominated Authority will be submitted to Audit Committee for taking final call.

**During Investigation the 'Person' Complained against:**

- The 'Person(s)' may be called upon by the Nominated Authority of a formal investigation (if need be) and will be given an opportunity for providing inputs during the investigation. He/she will have a duty to co-operate with the Nominated Authority/Audit Committee to the extent that such co-operation sought does not merely required him/her to admit guilt.
- The 'Person' shall have a right to consult with a person or persons of his/her choice including engaging a counsel at his/her own cost to represent him/her in the investigation proceedings.
- The 'Person' shall not interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witness shall not be influenced, threatened or intimidated.



**Whistle Blower:**

- Identity of Whistle Blower will be kept strictly confidential.
- He /she will not be given any unfair treatment by virtue of him/her having reported Protected Disclosure.
- Complete protection will be given to Whistle Blower against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action. Transfer, demotion, refusal of promotion.
- He/She will be, in case of need, required to give evidence in criminal or disciplinary proceedings, bank will arrange to get advice about the procedure.
- He/she should not make frivolous complaints and must give full specific facts of allegations being made against Person(s) along with supporting documents/evidences.
- He/she will also be subjected to disciplinary action if during or in investigation it is found that allegations were made just to settle some scores or harass the 'Person'.

**4. Submission of final report by Nominated Authority and Action thereon:**

- If the investigation report submitted by the Nominated Authority 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 applicable for breach under the appropriate HR Policies any other Policies laid in the Bank.
- The action initiated under HR Policy shall 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.
- HR will ensure the disciplinary action are concluded within stipulated time line and punishment or otherwise is awarded as per laid down norms.
- HR to create awareness among the staff by issuing notifications/circular to arrest recurrence of any such unethical/misdeeds in the Bank.

**5. Reporting to the Board & Retention of Documents:**

- All the Protected Disclosures in writing or documented along with the results of the investigation relating thereto shall be retained by the bank for a minimum period of 10 years.
- An annual review note will be placed by HR to Board informing details of cases in a Financial Year with gist of case, status of



pending cases, punishment awarded or otherwise, how awareness message was circulated to staff, preventive measures taken within one month from the end of the Financial Year.

- Audit Department will provide the inputs to HR for compilation of Board Note with details of all cases referred to them and outcome of the investigation.

#### **6. Review of Policy:**

- Whistle Blower Policy will be reviewed on annual basis and is subject to amendment as and when any new guidelines are issued by any regulator or Bank feels it necessary.

Ramesh Singh  
CEO & General Manager

