



THE KASARAGOD CO-OPERATIVE
TOWNBANK
LTD, No.970

WHISTLE-BLOWER
POLICY

RES No. Dated

Policy Custodian

Department	Inspection and Audit
Renewal Basis	To be reviewed every 3 years.

Synopsis:

Our Whistle-blower Policy aims to establish a system to receive protected disclosure relating to any allegation of corruption/misuse of power/misuse of discretion relating to any employee of the bank and to inquire thereof.

This Policy is framed under RBI guidelines as applicable and relevant to banks under provisions of Guidelines/Regulations.

The policy aims to:

- Provides avenues for employees to raise concerns internally as a matter of course and receive feedback on any action taken.
- Provide for matters to be dealt with quickly and appropriately and ensure that concerns are taken seriously.
- Reassure employees that they will be protected from victimization for whistleblowing in good faith.

Contents

Sl.No	Particulars
1	BACKGROUND
2	OBJECTIVE
3	ELIGIBILITY
4	COMPETENT AUTHORITY
5	PUBLIC INTEREST DISCLOSURE
6	SCOPE
7	WHISTLE-BLOWER'S ROLE
8	INQUIRY IN RELATION TO DISCLOSURE
9	WHISTLE-BLOWER'S PROTECTION
10	PROCEDURE FOR REPORTING
11	MODE OF OPERATION AT THE BANK LEVEL
12.	OTHER ASPECTS RELATED
13	STANDARD OPERATING PROCEDURE

1. BACKGROUND:

The Kasaragod Co-operative Town Bank Ltd No. 970, Kasaragod (herein after referred to as the Bank) is committed to its ethics and integrity. The Bank encourages an open culture in all its dealings between Staff, Managers, Customers and all people with whom it comes into contact/business relations.

The bank establishes a vigilant system for Directors, Employees and any Stake Holder to report concerns about unethical behavior, actual or suspected fraud or violation of the bank's code of conduct or relevant to bank.

This system or mechanism aims at providing sufficient safeguards against victimization of all concerned.

2. OBJECTIVE:

This policy aims to establish a mechanism to receive protected disclosure relating to any allegation of corruption or willful misuse of the power or willful misuse of discretion against any employee of the bank and to inquire or cause an inquiry into such disclosure and to provide adequate safeguards against victimization of the person making such protected disclosure and for matters connected therewith and incidental thereto.

3. ELIGIBILITY:

Various stakeholders of the bank are eligible to make Protected Disclosures under this policy. These stakeholders may fall into any of the following broad categories.

- a. Directors of the Bank
- b. Employee of the Bank
- c. Employees of other agencies deployed for the bank activities, whether working from any of the bank's offices or any other location.
- d. Contractors, Vendors, Suppliers, or Agencies (or any of their employees) providing any material or service to the Bank.
- e. Any other stakeholder.

4. COMPETENT AUTHORITY:

The Chairman of the Audit Committee of the Board will be the Competent Authority to deal with the protected disclosure received under the provision of this Policy.

5. PUBLIC INTEREST DISCLOSURE:

As a socially responsible organization, the Bank believes in conducting its affairs in a transparent manner by adopting the standards of integrity, professionalism, honesty, integrity, procedures and ethical steps. This Bank is committed to developing a platform where it is safe for all with equality with a concern of unacceptable/ unethical behavior/practices of misconduct at any level.

If the complainant has reasonable grounds of having seen/observed any unethical and improper practice or any other wrongful act in any of the branches/offices of the Bank, he may/can make a disclosure under this policy.

Every disclosure made as per the provision of this Policy shall be treated as public interest disclosure before the Competent Authority.

Disclosures shall be put in good faith and trust and the concerned he/she shall be made in good faith and the person(s) making protected disclosures shall make a self-declaration stating that he/she reasonably believes that the facts/information disclosed by him/her and the allegation made therein is substantially correct/true.

The Whistle-blower shall also state that he has not submitted any complaint on the same subject to any outside Authority/Agency or higher executives of the bank, before prior to this disclosure.

All protected disclosure shall be made in writing or by electronic media in accordance with the prescribed procedure in this policy, containing full details and be enclosed/attached by supporting documents, or any valid documents/other material, if any, suitable to substantiate the disclosure.

The Competent Authority if needed may call for further information or facts or particulars from the concerned person making the disclosure.

No action shall be taken on public interest disclosure by the Competent Authority if the disclosure does not indicate the identity of the complainant or if the identity of the complainant is found incorrect.

6. THE SCOPE:

The policy intends to help all stakeholders who may have concerns over any wrongdoing/happenings within the Bank to report unlawful conduct, misconduct, malpractices, violation of any legal or regulatory provisions, financial mismanagement, accounting irregularities, etc. The following acts may be reported under this Policy:

- a. Criminal Offence/action/manipulation (e.g. frauds, misappropriation, corruption, or theft) committed/likely to be committed in the bank or through the banking system.
- b. Failure to comply with legal/regulatory guidelines/law in the provisions of the acts etc.
- c. KYC/AML violations in due diligence, terrorist financing, transfer of funds to unlawful means to provide some undue advantage to someone in the system against national laws/safety.
- d. Breach of client promises by the bank and bank's funds used in an unauthorized manner.
- e. Sexual or physical abuse of a member of staff, service recipient, or service provider.
- f. Any other form of improper action or conduct.
- g. Information relating to any of the above deliberately concealed attempts being made to conceal the same.
- h. Fraudulent activity in an account.

7. WHISTLE-BLOWER'S ROLE:

The Whistle-blower's role is that of an "Informer" reporting with valuable and reliable facts of information/s. The whistle-blower is not expected to act as an investigator as a CID or as a fact-finder, nor would decide the appropriate solution for the problem raised or disclosed/corrective action that may be warranted in the given case. The Whistle-blower believes that the facts are true and is against the system.

8. INQUIRY IN RELATION TO DISCLOSURE BY WHISTLE-BLOWER:

The Competent Authority shall, upon receipt of the protected disclosure while concealing the identity of the complainant, shall make a discreet inquiry within a maximum period of 45 days, to ascertain whether there is any basis for proceeding further to investigate the disclosure.

The Competent Authority may close the matter if after conducting an inquiry, is of the opinion that:

"There are no sufficient or adequate grounds for proceeding with the inquiry"

Any disclosure relating to fraud and subject matters having vigilance implications will be brought to the notice of the Chief Executive Officer or and Chief Compliance Officer for further action by putting up before the Risk Management Committee and Audit

Committee of the Board. However, the name of the whistle blower will not be revealed to any of these functionaries except the Chief Executive Officer.

After conducting the investigation, if Competent Authority is of the opinion that report reveals either willful misuse of discretion or substantiates allegation of corruption it shall take the following steps:

- Recommend to the appropriate authority of initiation of a disciplinary proceeding or administrative action against the Concerned Official/s as per bank guidelines/Accountability Policy of the Bank.
- Taking corrective measures in the default/defects so that these will not happen in the future/sealing the avenue of scope.
- The Competent Authority/Committee or Board, on the merits of the case may or may not decide to go for a personal hearing before the closure of the matter.

Following matters shall NOT be entertained or inquired into by the Competent Authority to the extent.

- If any matter specified of an issue raised in disclosure has been determined by a Court of Tribunal authorized to determine the issue, after consideration of the matter specified or issue raised in the disclosure, the Competent Authority shall not take notice of the disclosure to the extent that the disclosure seeks to reopen such issue.
- If any public inquiry has already been ordered under the Public Servants Act or referred for inquiry under the Commission of Inquiry Act.
- If the protected disclosure is made after the expiry of seven years from the date on which the action complained against is alleged to have taken place.
- The Competent Authority shall not question any real or genuine action or discretion used by the official as per business rules.

9. WHISTLE-BLOWER'S PROTECTION:

If one raises a concern under this policy, he/she will be at risk of suffering any form of reprisal or retaliation. Retaliation includes decimation, reprisal, harassment, or vengeance in any manner. The bank will not tolerate the harassment or victimization of anyone raising a genuine concern.

The protection is available to whistle blower provided that:

- a. The communication/disclosure is made in good faith.
- b. He/She reasonably believes that information and any allegation contained in it is substantially true.

c. He/She is not acting for personal gain.

Bank will not disclose the identity, without his/her consent. If the situation arises where Bank is not able to resolve the concern without revealing the identity (for instance because his/her evidence is needed in court), the bank will discuss with his/her the matter in which the bank proposes to proceed, and within the confines of statutory requirements endeavor to meet his/her preference on revealing the identity.

10. PROCEDURE FOR REPORTING:

Any disclosure which is to be made under provisions of the Whistle-blower Policy should comply with the following aspects:-

- a. The disclosure should be sent in a secured manner by way of the closed envelope to the Chairman, Audit Committee of the Board.
- b. The envelope should be addressed to the officials as mentioned above and should be superscribed "**Disclosure under the provisions of Whistle-blower Policy**". The complainant should only give his/her name and address either at the beginning of the text of the disclosure or at the end of it.
- c. If the Whistle-blower wants that his/her name should not be disclosed, the text of the disclosure should be carefully drafted so as not to give any details or clue as to his/her identity. However, the details of the disclosure should be specific and verifiable.
- d. In order to have a speedy disposal of this disclosure the Whistles Blower should submit disclosure in a closed envelope superscribed "**Disclosure under the provisions of Whistle-blower Policy**". If the envelope is not superscribed and closed, it will not be possible for the Bank to cover the identity of the complainant.

11. OPERATION AT THE BANK LEVEL:

The Whistle-blower shall lodge the disclosure to the Chairman, Audit Committee of Board in a closed/secured envelope marked as "**Disclosure under the provisions of Whistle-blower Policy**" at the following address.

The Chairman of Audit Committee of Board,

The Kasragod Co-operative Town Bank Ltd No. 970,

Near Panduranga Temple Road,

Kasaragod -671 121

Alternatively, the Whistle-blower can disclose through email at whistleblower@kasaragodtownbank.com which will be owned by the Chairman of the Audit Committee Board. Whistle-blowers are advised to preferably use this mode as it will help in the concealment of the identity of the whistle-blower.

All the disclosure received under this Policy will be opened in the presence of the Chairman of the Audit Committee of the Board, by an authorized official designated in this regard by the Chairman, ACB. Once, the Chairman, ACB decides that this disclosure can be considered under the Whistle-blower Policy, the authorized official will enter it in a Register (called Corporate Register) containing brief particulars of the disclosure received under this Policy. He/she shall assign a Unique Reference Number (URN) and not the name of the Whistle-blower.

12. OTHER ASPECTS:

- ✓ Whistle-blower should refrain from sending reminders or seeking further development/action taken regarding disclosure made by him so as to protect his/her identity.
- ✓ An employee who knowingly makes false allegations of unethical improper practices or alleged wrongful conduct shall be subject to disciplinary action and will not be protected under the policy.
- ✓ All reports received in writing or documented, along with the result of the investigation relating thereto, shall be retained by the Bank for a period of seven years from the date of closure.
- ✓ The matters related to Appointments Postings/Transfers etc. will not be normally entertained under Whistle-blower Policy. For these types of matters, the complainant may use any other mechanism.
- ✓ The standard operating procedure (SOP) for the smooth rollout of this policy will be kept updated by the Audit Committee of the Board.

13. STANDARD OPERATING PROCEDURE:

PROCEDURAL GUIDELINES FOR HANDLING PROTECTED DISCLOSURE MADE BY WHISTLE-BLOWER

- ❖ All the protected disclosures received under this Policy will be opened in the presence of the Chairman, Audit Committee of the Board by an Authorized Official designated by the Chairman, Audit Committee of Board.
- ❖ Once, the Chairman, ACB decides that this disclosure can be considered under the Whistle-blower Policy, the authorized official will enter it in a Corporate Register containing brief particulars of the disclosure received under this Policy. He/She shall assign a Unique Reference Number (URN) to each disclosure.

- ❖ All inter-office correspondence in respect of disclosure received under the Whistle-blower Policy will be done citing only the Unique Reference Number (URN) and not the name of the Whistle-blower.
- ❖ For disclosure received through email whistleblower@kasaragodtownbank.com a password shall be allotted to the Chairman, Audit Committee of the Board. After examining the email, if he decides that this disclosure can be considered under the Whistle-blower Policy, he will forward the mail to the authorized official for entering into the Corporate Register and assigning a Unique Reference Number (URN).
- ❖ Within a reasonable period of receipt of a disclosure, the Authorized Officer shall provide an acknowledgment, followed by an initial response to the Whistle-blower on a selective basis.
- ❖ The Authorized Official will furnish a brief note covering all details about the matter that Whistle-blower wishes to report. The authorized Official should not mention in this note the name or any other particulars that may identify the Whistle-blower.
- ❖ Copies of documents that may help in establishing the veracity of the report may preferably be attached to the note. However, care may be taken that these papers do not contain the name or any other particulars indicating the Whistle-blower's identity.
- ❖ The aforesaid note along with the instruction of the Chairman of ACB should be sent alongwith a forwarding letter/email message to the Risk Management Committee/Special Committee of the Board for monitoring High-Value frauds and to discuss further/appropriate action.
- ❖ Risk Management Committee/Special Committee (for matters referred above) may investigate the disclosure on its own/may assign the investigation to any official in the field or may request to get the investigation done from any Auditor/Senior Official. The report is submitted to the Chairman, ACB on a Q/M basis.
- ❖ The Chairman, ACB may recommend the matter for Disciplinary action or Administrative action.
- ❖ The Board will include the confirmation in Annual Disclosures that no person has been denied access to the Chairman of the Audit Committee of the Board.
- ❖ If there is any serious issue involved in any type of disclosure, the matter shall be brought to the notice of the Board.
- ❖ ACB will monitor all cases of Whistle-blower disclosures regularly and keep the Board informed through the minutes of ACB meetings/or as deemed appropriate.

CHIEF EXECUTIVE OFFICER

DIRECTOR

DIRECTOR

CHAIRMAN