

**ANNEXURE**  
**WHISTLE BLOWER POLICY**

**PREFACE:**

As a socially responsible organization, the Bank believes in conducting its affairs in a fair and transparent manner. For this, the Bank has adopted the highest standards of Professionalism, Honesty, Integrity and Ethical Behavior. Further, the Bank is committed to developing a culture wherein it is safe for all to raise concerns about any Unacceptable/Unethical practice and any event of misconduct at any level.

Accordingly, it has been decided to introduce a Whistle Blower Policy in the Bank based on Govt. of India Resolution on Public Interest Disclosure & Protection of Informer (PIDPI). Whistle Blower Policy is being put in place to enable the various Stake Holders/Persons to report Unethical Practices/ Frauds if any are observed in any Operational area.

**POLICY STATEMENT**

**Guidelines in respect of lodging the complaint:**

1. Notwithstanding anything contained in the Official Secrets Act, 1923, any Public Servant other than those referred to Clause (a) to (d) of Article 33 of the Constitution or any other Person including any Non-Governmental Organization may make a written disclosure to the Designated authority.
2. The complaint should be in a Closed/Secured envelope and should be addressed to: Chief Vigilance Officer, Vigilance Department, Syndicate Bank, Corporate Office, Gandhinagar, Bangalore 560009.
3. The envelope should be super scribed “Complaint under the Whistle Blower Policy”. If the envelope is not super scribed and closed, it will not be possible for the Bank to protect the complainant under the above resolution and the complaint will be dealt with as per the normal complaint policy of the Bank. The complainant should give His/Her Name and Address, Telephone numbers, Email id, in the beginning or end of complaint or in an attached letter. However, the same shall be kept strictly confidential. The disclosure or complaint shall contain as full particulars as possible and shall be accompanied by supporting documents or other materials.
4. All such envelopes will be opened by the Chief Vigilance Officer or by a Person Authorized by the CVO (i.e. Senior-Most Dy. General Manager/Asstt. General Manager in the Vigilance Department in the Bank). The identity of the complainant would be confirmed by the senior most DGM/AGM in the Vigilance Department by writing a letter to him/her. The Whistle Blower/Complainant will be required to confirm within 30 days of receipt of letter that he had sent the complaint and also Confirm/Certify that he had not made Similar/Identical allegations of Corruption/Misuse of Office to any other authority to qualify as ‘Whistle Blower’ complainant. After the identity is confirmed, both CVO and Senior Most DGM/AGM of Vigilance Department will ensure that the identity of the Complainant is removed from the body of the complaint and further action on complaint will be initiated.
5. While considering the complaints, the Designated Authority would take no action on complaints relating to administrative matters like recruitment, promotion, transfers and other related issues. However, in case of serious complaints of irregularities in these matters, the same shall be brought to the notice of Managing Director and CEO for taking appropriate action.
6. The Designated Authority shall not entertain or inquire in to any disclosure in respect of which a formal inquiry has already been ordered under Bank’s Service Regulations for Employees or matters which are subjudice or being enquired in to by law enforcing agencies.

7. Anonymous/Pseudonymous complaints will not be entertained.
8. The identity of the complainant will not be revealed unless the complainant himself/herself has made the details of the complaint either public or disclosed his/her identity to any other Office or Authority.
9. The text of the complaint should be carefully drafted so as not to give any details or clue as to the complainant's identity. However, the details of the complaint should be specific and verifiable.
10. In order to protect identity of the person, the Bank will not issue any acknowledgement and the Whistle-Blower is advised not to enter into any further correspondence with the Bank in their own interest. The Bank assures that, subject to the facts of the case being verifiable; it will take the necessary action as deemed appropriate. If any further clarification is required, the Bank will get in touch with the complainant.
11. The Whistle Blower's role is that of a reporting person with reliable information. He/she is not required to act as an investigator, nor would he/she determine the appropriate corrective action that may be warranted in a given case.
12. The whistle blower will not conduct any investigation on his/her own, nor will He/She has a right to participate in any investigative activities other than as requested by the Chief Vigilance Officer.

### **INVESTIGATION**

The Chief Vigilance Officer may entrust the investigation to an appropriate officer, either directly or through Inspection Department or concerned Regional Office, ensuring that the identity of the Whistle Blower is not disclosed.

### **DECISION**

On the basis of investigation report, if it is concluded that an improper or unethical act has been committed, the Chief Vigilance Officer shall forward the papers to the appropriate authority to take suitable disciplinary action against the erring Officials.

### **PROTECTION**

All steps will be taken to provide adequate safeguard against victimization of the Employees who have reported a disclosure/complaint under the policy. Bank, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair treatment adopted against the Whistle Blower. Complete protection will therefore be offered to the Whistle Blowers against any unfair practice including any act of obstructing the Whistleblower's right to continue to perform his duties including making further disclosures.

### **DISQUALIFICATION**

Pursuant to a complaint, if the investigation reveals the involvement of the Whistle Blower himself in the act and/or irregularity, no protection including that of non-disclosure under this policy shall be available to the Whistle Blower under any circumstances and he/she shall be liable to be proceeded against as per norms, for his involvement in the act and/or irregularity.

### **REVIEW OF FUNCTIONING OF THE WHISTLE BLOWER MECHANISM**

An annual report, as at the end of March, with the number of complaints received under this mechanism by the Chief Vigilance Officer and their outcome shall be placed before the Board of Directors.

**AMENDMENT**

The Bank reserves its right to amend or modify the Policy in part or in whole, at any time without assigning any reason whatsoever.

**PUBLICITY**

To give publicity to the procedure for complaints under Whistle Blower Policy, it is proposed to post the Policy on Bank's website and intranet, besides circulating the same to branches and offices through circular.

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