

WHISTLE BLOWER POLICY



SUPPORT

(Society for Upliftment of People with People's Organization & Rural Technology)

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Whistle Blower Policy - SUPPORT

CONTENT

- 1.0 PREAMBLE & PURPOSE
- 2.0 DEFINITIONS
- 3.0 SCOPE
- 4.0 REPORTING MECHANISM
- 5.0 ASSURANCE AGAINST RETALIATION
- 6.0 CONFIDENTIALITY
- 8.0 RESPONSIBILITIES
- 7.0 INVESTIGATION PROCESS
- 9.0 FALSE ALLEGATIONS
- 10.0 REVIEW OF THE POLICY

SUPPORT



WHISTLE BLOWER POLICY FOR SUPPORT

(Society for Upliftment of People with People's Organization and Rural Technology)

Policy Name: Whistle Blower Policy

Effective Date:

Applicable To: All Trustees, Staff (Permanent, Temporary, Contractual), Volunteers, Interns, and Associates of SUPPORT.

1.0 PREAMBLE & PURPOSE

SUPPORT is committed to the highest standards of integrity, accountability, transparency, and ethical conduct in all its operations. This Whistle Blower Policy aims to provide a secure and confidential mechanism for all stakeholders to report genuine concerns or instances of unethical behavior, malpractice, fraud, or misconduct within the organization without fear of victimization, harassment, or retaliation.

The primary purpose of this policy is to:

- Safeguard the organization's values and resources.
- Ensure good governance and public trust.
- Protect individuals who raise concerns in good faith.
- Provide a clear framework for reporting and investigating concerns.
- For making a conducive environment within the organization.

2.0 DEFINITIONS

- **Whistle Blower:** A Trustee, employee, volunteer, intern, or any associate of SUPPORT who reports a concern under this policy in good faith.
- **Good Faith:** A report is made with honesty and without malice. It is not considered "Good Faith" if made knowingly with false or misleading information.
- **Protected Disclosure:** A communication made by a Whistle Blower about an alleged improper activity, which they reasonably believe to be true.
- **Subject:** The person(s) against whom a complaint or allegation is made.
- **Improper Activity/Misconduct:** Any activity that an employee or associate of SUPPORT commits that is:
 - o Unethical or illegal.
 - o Fraudulent or corrupt (including bribery, as per the Anti-Bribery Policy).
 - o A violation of SUPPORT's Code of Conduct, Financial Policy, or other internal policies.
 - o A miscarriage of justice.
 - o A danger to health, safety, or the environment.
 - o An attempt to conceal any of the above.

3.0 SCOPE

This policy applies to all activities and operations of SUPPORT, including its Registered office, Head office, all branch offices.

4.0 REPORTING MECHANISM

Whistle Blowers are encouraged to report their concerns through the following channels:

Primary Reporting Channel:

- The Complaints Committee: Concerns can be reported directly to the designated Complaints Committee via a dedicated email ID or phone number.
 - o Email: supporthzb@gmail.com
 - o Phone/Mobile: 9431185632



Alternative Reporting Channels:

If the Whistle Blower is uncomfortable reporting to the committee, they may report directly to:

1. The President of the Executive Committee: Er. Dhirendra Kumar Sinha
2. The Secretary-cum-CEO: Dr. B.S. Gupta

What to Report:

The report should provide a clear, factual description of the incident(s), including dates, places, persons involved, supporting documents (if any), they may or may not reveal or mention their identity and the Whistle Blower's contact information for follow-up.

Anonymous Reporting:

While anonymous reports will be considered, they are often more difficult to investigate effectively. Providing contact information allows for a more thorough and fair investigation.

5.0 ASSURANCE AGAINST RETALIATION

SUPPORT strictly prohibits any form of retaliation, harassment, victimization, or discrimination against a Whistle Blower who has raised a concern in good faith. Any individual found engaging in such acts will be subject to disciplinary action, which may include termination of employment or contract.

6.0 CONFIDENTIALITY

The identity of the Whistle Blower and the details of the concern will be kept confidential to the fullest extent possible, consistent with the need to conduct a fair and thorough investigation. Information will only be shared with those who have a legitimate need to know.

7.0 INVESTIGATION PROCESS

- 1. Acknowledgment:** The Complaints Committee will acknowledge receipt of the complaint within 7 working days.
- 2. Preliminary Assessment:** The committee will conduct a preliminary review to determine if the complaint is made in good faith and falls under the scope of this policy.
- 3. Investigation:** If a prima facie case exists, a detailed investigation will be initiated. The investigation will be fair, objective, and conducted by persons with appropriate seniority and competence.
- 4. Timeline:** Every effort will be made to complete the investigation within 45 days of receiving the complaint. Complex cases may require more time.
- 5. Findings & Action:** Based on the investigation findings, the Complaints Committee will recommend appropriate action to the Executive Committee. Actions may range from a warning to disciplinary proceedings, legal action, or reporting the matter to relevant authorities.
- 6. Communication to Whistle Blower:** The Whistle Blower will be informed of the outcome of the investigation, subject to constraints of confidentiality and legality.

8.0 RESPONSIBILITIES

- **Whistle Blower:** To report concerns in good faith and without malice.
- **Complaints Committee:** To receive, investigate, and resolve complaints impartially and confidentially.



- Executive Committee/Secretary-cum-CEO: To ensure the policy is implemented effectively and to take final decisions on investigative recommendations.
- All Staff & Associates: To be aware of and adhere to this policy.

*Committee Members :- The Committee shall comprise of 3 members (Including 1 Female)

9.0 FALSE ALLEGATIONS

If an investigation concludes that a Whistle Blower has made a false allegation maliciously, knowingly, or vexatiously, that individual will be subject to disciplinary action.

10.0 REVIEW OF THE POLICY

This policy shall be reviewed every three years by the Executive Committee, or sooner if required by changes in law or organizational needs.