

Whistle Blower Policy

The Bank is committed to the highest standards of ethics, integrity & professionalism in all the activities & operations that it conducts and has defined systems & procedures in place to root out corruption, malpractices and abuse of authority by the employees/ officers in the Bank. The Bank encourages an open & transparent system of working and dealings between the members of staff/officers, customers and members of general public coming into contact with the Bank.

The Bank is already having a proper complaint handling policy in place and also a separate policy for public interest disclosures that ensures protection of informers, as envisaged in the Government of India Resolution dated 17th May 2004. As the Bank comes within the purview of Central Vigilance Commission, a well-defined policy in line with the GOI resolution, as above, is necessary to inform & make aware the employees, officers, customers and members of general public about the norms and various provisions of PIDPI. The Bank, therefore, has come out with revised policy named as '**ALL-Bank Whistle Blower Policy**' to serve the above purpose.

Preamble

- 1.1 Disclosure of information in public interest by the employees of the organisation gaining acceptance by public bodies for ensuring better governance standards and probity / transparency in the conduct of affairs in the Bank. Large-scale corporate frauds have internationally necessitated various legislative measures for safeguarding public interest through enactment of various legislation like Whistle Blower Protection Act in USA and Public Interest Disclosure Act in U.K.
- 1.2 Whistle Blower Act has not yet been enacted in India. The Government of India passed a resolution on 21st April, 2004 on 'Public Interest Disclosures & Protection of Informer' wherein the Central Vigilance Commission (CVC) has been authorised as "Designated Agency" to receive written complaints or disclosure on any allegation of corruption or misuse of office and recommend appropriate action. The jurisdiction of the CVC in this regard is restricted to the employees of the Central Government or of any corporation established by it or under any Central Act, Government Companies, societies or local authorities owned or controlled by the Central Government.
- 1.3 In line with the proposals in the resolution of Government of India, the Central Vigilance Commission has formulated norms for acceptance of complaints under the PIDPI and to keep the identity of the complainant secret.
- 1.4 Allahabad Bank is a Public Sector Bank and falls within the purview of CVC. Hence, a proper policy for public Interest Disclosures and Protection of Informer (PIDPI) has been formulated which is named as "**All-Bank Whistle Blower Policy**'."

Objectives

- 2.1 The Policy has been framed with a view to raise the standard of ethics, morals & integrity and to encourage a culture of openness & transparency in dealings between employees / officers / customers and all members of public who come in contact with Bank.
- 2.2 It has been brought with the strong desire to act as a deterrent against corruption & malpractices at different levels and to enhance the level of observance of systems & procedures in the Bank.
- 2.3 The Policy aims at quickly spotting aberrations and dealing with it in the shortest possible time. It will be disseminated among the employees & officers of the Bank ensuring them full confidentiality against disclosure of names and protection to the Whistle Blower against any personal vindictive actions such as humiliation, harassment or any other form of unfair treatment or subjecting to any kind of loss on account of his public interest disclosures.

Scope and Coverage

- 3.1 The complaints / disclosures under the policy would cover the areas such as corruption, misuse of office, criminal offences, suspected /actual fraud, failure to comply with existing rules and regulations, systems & procedures of the Bank and other acts resulting in financial loss / operational risk, loss of reputation etc. detrimental to the interest of the Bank , the depositors and the public.
- 3.2 The Employees of the Bank, customers, stakeholders, non-governmental organisations (NGO), Members of Civil Society and the general Public can lodge complaints/ disclosures under the scheme

Procedure for lodging complaint under the Policy

- 4.1 All complaints under PIDPI resolution may be sent directly to the Chief Vigilance Officer, Allahabad Bank over e-mail ID (gmcvo@allahabadbank.in) / the Executive Director, Allahabad Bank over e-mail ID (eds@allahabadbank.in) / Central Vigilance Commissioner, New Delhi.
- 4.2 The complaint should be in a closed / secured envelope.
- 4.3 The envelope should be addressed to the **CVO / ED, Allahabad Bank, 2 N.S. Road, Kolkata** and should be **superscribed** as "Complaint under the Public Interest Disclosure".
- 4.4 If envelope is not superscribed and closed, it will not be possible for the Bank to protect the complainant under the above policy and such complaints will be dealt with as per the normal complaint policy of the Bank.

- 4.5 The Complainant should give his /her name and address in the beginning or in the end of the complaint or give in an attached letter.
- 4.6 The Bank will not entertain/act anonymous/ pseudonymous complaints.
- 4.7 The text of the complaint should be carefully drafted so as not to give any detail or clue as to the identity of the complaint.
- 4.8 The details/facts mentioned in the complaint should be specific and verifiable.
- 4.9 In order to protect identity of the person/complainant, the Bank will not issue any acknowledgement.
- 4.10 In order to ensure absolute secrecy & confidentiality of the identity of the complainant, no further correspondence in the matter of complaint will be entertained from the complainant and the complainant, in his own interest, should not write or attempt to contact the Bank.
- 4.11 In respect of those complaints which are considered fit for processing under PIDPI Resolution, a letter is sent to the complainant to obtain (a) confirmation as to whether he/ she has made the complaint or not and (b) a certificate that he/ she has not made similar/ identical allegation of corruption/ misuse of office to any other authorities to qualify as a Whistle blower complaint. Prescribed time limit for receiving the confirmation and the certificate from the complainant is 30 days from the date of receipt of letter by the complainant. In case of no response within the prescribed time limit , a reminder is issued, giving additional two weeks' time to the complainant for sending confirmation and the certificate. If there is still no response from the complainant, the complaint will be dealt as per Complaint Handling Policy of the Commission.
- 4.12 After the identity is confirmed, the AGM/DGM of Vigilance Department, so authorised will ensure that the identity of the complainant is removed from the body of the complaint and the dummy complaint with a serial number will be allotted to identify/trace it in future. The same no. will be maintained at the Separate register.

Procedure for Handling the Complaint

- 5.1 All complaints received will be serially entered in a register with full particulars viz. number & date of complaint, date of receipt, brief contents/allegations levelled in the complaint.
- 5.2 No acknowledgement of the complaint will be issued to the complainant from the Bank.
- 5.3 Subject to the facts & allegations made in the complaint verifiable, the Chief Vigilance Officer will cause investigation in the matter and will take necessary action in the matter.

- 5.4 However, if deemed emergent & necessary to verify the contents of the complaint, the Bank will get in touch with the complainant at the address / phone / mobile number / e-mail ID given in the complaint.
- 5.5 Either as a result of discreet enquiry or on the basis of complaint itself without any enquiry, if the CVO is of the opinion that the matter requires to be further investigated, he may invite comments / response from the concerned employees / officers of the bank as a part of Investigation.
- 5.6 All relevant papers / documents with respect to the matters raised in the complaint will be obtained, if necessary, by the CVO and investigation in the matter will be commenced immediately.
- 5.7 As far as possible, the investigation in the matter will be expeditiously completed and Investigation report will be submitted to the Commission within two weeks of the receipt of the complaint from the CVC.
- 5.8 Subsequent to the receipt of directions from Central Vigilance Commission for taking any disciplinary action based on such complaints, the CVO will follow up the case and advise confirmation of compliance of further action taken by the Disciplinary Authority and he will keep the commission informed of the delay, if any, occurred in the matter.

Protection available to the complainant

- 6.1 If the complainant is a members of staff/officer, he / she should give his /her name and address with pin code number, phone & or mobile number and e-mail ID, if any, prominently at the beginning or at the end of the complaint or in the covering letter. Further details such as name, designation, name of branch / office / department at which he / she is working, should be clearly mentioned.
- 6.2 The Bank will ensure that no punitive / administrative action will be taken by any concerned authority in the Bank against any person on perceived reasons / suspicion of being 'whistle blower'.
- 6.3 The identity of the complainant will not be revealed unless the complainant himself has made the details of his complaint either public or disclosed his identity to any other person / authority.
- 6.4 The Bank shall not take any action or initiate any proceedings to victimize / harass or to intimidate the complainant solely for the reason of his having filed the complaint under the policy.
- 6.5 If any person is aggrieved by any action on the ground that he has been victimised or harassed due to filing of complaint or disclosure, he may file an application before the **MD & CEO** seeking redressal of his grievance. The MD & CEO will examine the matter and will take such actions as he/ she may deem fit for redressal of the grievance.
- 6.6 In case the complainant is an employee / officer of the Bank, the Bank shall not take or recommend to take any administrative or disciplinary action against that employee/ officer [i.e. **whistle blower**] in retaliation to his lodging the

complaint under the policy and will take all measures / actions to prevent initiation of any adverse administrative/ disciplinary action against the employee/ officer. However, the employee/ officer shall not be protected for his / her misconduct, which does not relate to the disclosures, made as a whistle blower.

- 6.7 An employee / officer, who knowingly makes false allegations of unethical & improper practices or knowingly alleges wrongful conduct, shall be subjected to disciplinary action, as appropriate, and will not be protected under the policy.
- 6.8 In case the Bank finds that the complaint is motivated or vexatious, it shall take action, as appropriate, against the complainant
