

# **ANDHRA PRADESH GRAMEENA BANK**

## **WHISTLE BLOWER POLICY 2025-26**

### **HRM Department**

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## 1. OBJECTIVE

As a part of handling complaints, maintenance of Corporate Governance and towards achieving greater transparency, 'Whistle Blower Mechanism' is being put in place to enable our employees to report unethical practices, frauds, if they observe in any operational area. The policy has been put in place to provide a framework to employees to act as whistle blowers. It aims to protect such whistle blowers wishing to raise a concern about any allegations of corruption or of misuse of office that could jeopardize the interest of the Bank.

## 2. PROCEDURES TO BE FOLLOWED BY WHISTLE BLOWERS:

2.1 The employees of the Bank may make a written complaint to the Designated Authority.

2.2 The complaint shall be in a closed/secured envelope and should be addressed to the General Manager, HR Dept., Head Office, who is the “**Designated Authority**” at the following address:

The General Manager  
Department of Human Resources  
Andhra Pradesh Grameena Bank  
Head Office  
Amaravathi  
Andhra Pradesh.

### 2.3 Role and Responsibilities of whistle blowers:

The intent of this Policy is to bring genuine and serious issues to the forum and it is not intended for petty disclosures. Employees are expected to exercise their rights under this Policy in a judicious manner by adhering to the following guidelines.

- a. The disclosure/complaint shall contain as full particulars as possible and shall be accompanied by supporting documents or other material available.
- b. Avoiding anonymity when raising a concern.
- c. Follow the procedures prescribed in the policy for making a disclosure.
- d. Bring to early attention of the Bank any improper practice he/she become aware of delay in reporting may lead to loss of evidence and also financial loss for the organization.
- e. Cooperate with investigating authorities, maintain full confidentiality.

### 3.1 Procedure for handling of complaints

3.1.1 The 'Designated Authority' i.e. General Manager, HR Dept., HO, shall authorize an officer not below the level of Chief Manager/Senior Manager of HR Dept., HO for receiving complaints.

3.1.2 The envelope shall be super- scribed with “**Complaint under the Whistle Blower Mechanism**”. If the envelope is not super- scribed as mentioned above, it will not be possible to protect the complainant under the above mechanism and the complaint will be dealt with as a normal complaint. The complainant shall give his/her name and address, telephone number, email id, in the beginning or end of the complaint or in an attached letter. The

disclosure or complaint shall contain, as full particulars as possible and shall be accompanied by supporting documents or other materials. (Content already covered under 2.3.a)

3.1.3 All such envelopes will be opened by an authorized official (i.e. Chief Manager/Senior Manager in HR Dept.) in presence of the designated authority i.e., General Manager, HR Dept.

3.1.4 The identity of the complainant would be confirmed by the Chief Manager/Senior Manager in the HR Dept. so authorized by writing a letter to him/her. (Sample copy of the letter is enclosed as Annexure.)

3.1.5 The Whistle Blower/Complainant will be required to confirm within 30 days of receipt of letter that he/she had sent the complaint and also confirm/certify that he/she had not made similar/identical allegations of corruption/misuse of office to any other authority to qualify as a "Whistle Blower" complainant. While sending such confirmation, envelope should be super scribed with "**Complaint under the Whistle Blower Mechanism**". If the envelope is not super- scribed as mentioned above, it will not be possible to protect the complainant under the above mechanism and the complaint will be dealt with as a normal complaint.

3.1.6 After the identity is confirmed, the Chief Manager/Senior Manager of HR Dept. so authorized will ensure that the identity of the complainant is removed from the body of the complaint and the dummy complaint is given a number with which the original complaint can be traced back. Further action on complaint will be initiated as per Bank norms.

3.1.7 The original complaint would be kept in a safe/almirah duly ensuring dual custody. The custody of the almirah will remain with the Chief Manager/Senior Manager so authorized and at no point of time the complaint can be accessed except Authorized/Designated Authority.

3.1.8 The dummy complaint so made would be submitted to the 'Designated Authority' who would take the decision whether the matter requires to be looked into further and report is to be called in the matter from the respective Regional Offices. (Separate file may be maintained for complaints under Whistle Blower Mechanism).

3.1.9 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.

3.1.10 In such cases, where a decision has been taken to call for a report, a maximum time limit of 2 weeks may be given. In case no reply is received within two weeks, a reminder should be sent at the level of the Authorised Person. If no reply is still received, the second reminder after 2 weeks should be sent at the level of the "Designated Authority". If no reply is still received, the "Designated Authority' may call for an explanation and recommend administrative action for deliberate delay.

3.1.11 On receipt of the report, the concerned Chief Manager/Senior Manager of HR Dept. so authorized will put up the matter to the 'Designated Authority'. The Designated Authority may take a call on the matter and take appropriate action as per Bank norms.

3.1.12 In case of serious complaints of irregularities, the Designated Authority shall order a detailed investigation into the matter.

3.1.13 On receipt of the Investigation Report, the same shall be scrutinized by the **3 General Managers' committee** as per Fraud Risk Management Policy(Please note to add the Dept. as

existing/Proposed ) for monitoring frauds taken place in the Bank for initiating further action in the matter.

3.1.14 meanwhile, the "Designated Authority" shall ensure that no punitive action is taken by any concerned Administrative authority against any person on perceived reasons/suspicion of being "whistle blower".

3.1.15 The Chief Manager/Senior Manager so authorized shall maintain a separate list for the complaints received under the Policy and enter the information in the computer system and monitor their progress periodically and put up the same to the Designated Authority every 2 weeks.

3.1.16 wherever the complainant has alleged victimization/harassment the "Designated Authority" shall ensure that if the identity of the complainant somehow becomes known, he/she should not be harassed/victimized by way of frequent transfers etc.

**3.1.17 List of Documents to be preserved/Maintained (As applicable)**

- a. Copy of complaint in hand form that can be filed and preserved.
- b. Copy of the complaint in soft form that can be provided through email whenever required
- c. Records collected during investigation including, electronic data and documents
- d. Reports submitted by the investigators
- e. Final reports submitted
- f. Audit Committee reports/reviews
- g. Back-up of Committee papers
- h. Any communication to/from Business Group, Operations Group, HRD etc.
- i. Records of action taken
- j. Notes/details submitted to Audit Committee
- k. Any other working papers relevant to the case.

**3.1.18 Record Retention:** To provide protection to whistle blower and to maintain secrecy about identity of complainant, records collected during investigation, including complaint copy need to be preserved with strict controls by HR/Legal support Department. Further, to avoid leakage of information and to avoid misuse of the information, data maintenance and retrieval need to be under proper controlled environment.

**4. DISQUALIFICATIONS:**

4.1 While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection will warrant appropriate action/disciplinary action. Protection under this policy would not mean protection from disciplinary action arising out of allegations made by the Whistle Blower, which are found to be false or bogus or done with a malafide intention.

4.2 Pursuant to a complaint, if the investigation reveals the involvement of the Whistle Blower himself/herself 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/her involvement in the act and/or irregularity.

## **5. REVIEW OF FUNCTIONING OF THE WHISTLE BLOWER MECHANISM/ REPORTING STRUCTURE/ MONITORING:**

A quarterly report with the number of complaints received under this Policy by the HR Dept. along with the outcome shall be placed before the Audit Committee of the Board.

## **6. PUBLICATION:**

The Policy will be posted on the Bank's website and Intranet.

## **7. ORDER OF PREVALENCE:**

This shall be in supersession of all earlier Circulars, instructions issued on the subject matter.

**8. OPERATION:** This policy shall be in force till such time it is repealed/reviewed.

## **9. GENERAL PROVISIONS/ EXCEPTIONS:**

9.1 Anonymous/pseudonymous complaints will not be entertained.

9.2 The text of the complaint should be carefully drafted so as not to give any details or clue as to the identity of the whistle-blower. However, the details of the complaint should be specific and verifiable.

9.3 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.

9.4 The Designated Authority shall not entertain or inquire into any disclosure in respect of which a formal inquiry has been ordered under Andhra Pradesh Grameena Bank (Officers & Employees') Service Regulations or any such disclosure, which is subjudice or being enquired by law enforcing agencies.

## **10. REGULATORY:**

This Whistle Blower Policy is based on the provisions of RRB Act, under the guidance of NABARD and Sponsor Bank.

## **11. MAKING MODIFICATIONS/ISSUING CLARIFICATIONS:**

The Board shall be competent to make any changes, issue clarification with respect to the policy in tune with the Government Guidelines/Central Vigilance Commission Guidelines/other Regulatory guidelines issued from time to time.

To,

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.....

Sir,

Please refer to your complaint dated received on ..... under "Whistle Blower Policy".

2. As per policy, a complainant is required to confirm that he/she has actually sent the said complaint to the Bank. You are, therefore, requested to confirm within 30 days of receipt of this letter, that you have sent the above-mentioned complaint.

3. You are also requested to furnish a certificate to the Bank as per format enclosed that you have not made similar/identical allegations of corruption/misuse of office to any other authorities to qualify as a 'Whistle Blower' complainant.

4. The reply may be addressed to the undersigned by name.

Yours faithfully

Encl: Certificate.

**CERTIFICATE**

It is certified that I have not made similar/identical allegation of corruption/misuse of office to any other authorities to qualify as a Whistle Blower complainant.

Date:

Signature

Name of the Complainant  
Address