

## PREAMBLE

The whistle blower policy is for eliminating of malpractices in the system. This policy encourages all the employees to come out with their complaints regarding any kind of misuse of organisation properties, mismanagement or wrongful conduct prevailing in the organisation, if any.

Whistle-blower may be an individual employee, programme or project partner, associate or a beneficiary of the organisation, who makes a Protected Disclosure, keeping the interest of the organisation in mind. The information on suspected wrongful conduct is such information which the employee / associates in good faith believe have evidences. The Whistle blower's role is simply to 'Raise the Alarm' without fear of retaliation of any kind. Such disclosures should be only in relation to matters concerning the organisation and not anything to do with personal enmity or rivalry or any issues concerning grievances arising out of employment terms and conditions.

## Purpose

1. To encourage the employee/ associate to report and disclose to the management about suspected unethical behaviour, malpractices, wrongful conduct, fraud, violation of the organisation policy including code of ethics and conduct, violation of law or questionable accounting or auditing matters by any employee in the organisation without any fear of retaliation.
2. To build and strengthen a culture of transparency and trust in the organisation.

## Applicability

This policy applies to all the employees, programme or project partners, associate or a beneficiary of the organisation.

## Making a Disclosure

1. When the issue raised by the whistle blower is related to any staff or persons associated with LEPRA Society, the issue will be reported to the Chief Executive, initially by telephonic communication, followed by email or written communication.
2. This protocol shall be followed strictly and any violation, including lines of reporting and issues not related to the said policy shall be viewed seriously by the management. In any case, personal grievances and vindictive issues against a co-employee shall not form part of this policy.
3. Any anonymous complaint received will be considered, only on having strong evidence.
4. In case the issue concerns the CE, it shall be reported to the Ombudsman, Chair of LEPRA Society.
5. The information on suspected wrongful conduct should be such information which the Employee/ associate in good faith, believes and has evidence of any of the following.
 

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|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| I. Violation of any law or regulations, including but not limited to corruption, bribery, fraud, coercion and wilful omission | VII. Unofficial use of organisation's material/ human assets.                          |
| II. Pass back of commission/ benefit of conflict of interest.                                                                 | VIII. Activities violating organisation policies including code of ethics and conduct. |
| III. Procurement frauds.                                                                                                      | IX. A substantial and specific danger to public health and safety.                     |
| IV. Mismanagement, gross wastage or misappropriation of organisation funds/assets.                                            | X. An abuse of authority                                                               |
| V. Manipulation of organisation data/ records.                                                                                | XI. An act of discrimination of caste, religion, & gender.                             |
| VI. Stealing cash/ organisation assets; leaking confidential or proprietary information.                                      |                                                                                        |

The above list is only illustrative and should not be considered as exhaustive. On receipt of the report or information the Chief Executive/authorised officer will appoint an enquiry officer or an enquiry committee to investigate into the matter.

## Disclosure Investigation

The enquiry officer/committee, after proper scrutiny, must investigate within 30 days upon receipt of the complaint. They will ascertain the corrective measures for the said complaint.

1. If the complaint is not substantiated due lack of proper evidence and if the wrongful practice as mentioned by the whistle blower is not established, then the complaint needs to be closed.
2. On investigation, if the complaint is established, action against the concerned person is to be recommended.
3. During investigation, if any flaws in the policies or systems of the management are observed, appropriate corrective measures need to be recommended.

Management, on the basis of the recommendation of the enquiry officer/committee, shall take appropriate action immediately.

## Confidentiality

Disclosure of wrongful conduct may be submitted on a confidential basis and the identity of the complaint will be kept strictly confidential unless required legally.

## Protection against victimization

Retaliatory action by any concerned employee shall not be allowed against the one who makes any good-faith disclosure of wrongful conduct. However if there is any incidence of retaliation, such claims of retaliation will be taken up seriously; allegations of retaliation will be investigated and appropriate action taken.

## Notification

LEPRA Society shall notify and communicate the existence and contents of this policy to their employees. The new employees shall be informed about the policy by the HR department.

## Amendment

LEPRA Society reserves it's right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever and shall be made available on the website of the organisation.

This policy will come into effect on 1st January 2021