BASSEIN CATHOLIC
CO-OPERATIVE BANK LTD

(SCHEDULED BANK)

WHISTLE BLOWER POLICY

Version 4.0

DOCUMENT DETAILS

DOCUMENT VERSION HISTORY

Document Title	Whistleblower Policy	
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Policy Owner Department	HR Department	

Sr. No.	Date	Particulars	Remarks
1	March 2020	Whistleblower Policy – V 1.0	Formation of Policy
2	March 2020	Whistleblower Policy – V 2.0	Date of review of Policy Change in Signatory
3	March 2020	Whistleblower Policy – V 3.0	Review of Policy – Change in Signatory
4	June 2026	Whistleblower Policy – V 4.0	- Introduction of Ombudsperson - Formation of Whistle Blower Committee - Frequency of Review updated

Seema

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Chief Executive Officer

BASSEIN CATHOLIC CO-OP BANK LTD. HEAD OFFICE

1. OBJECTIVE:

1) A Whistleblower Policy and its effective enforcement, has the potential not only to significantly reduce fraudulent activity but also to send a signal to both internal and external constituencies that the Bank exercises good Corporate Governance.

2) It provides a framework for employees, stakeholders and other third parties to report concerns about potential unethical, illegal or improper conduct within the Bank. The objective of this policy is to encourage the reporting of such concerns without fear of retaliation and to ensure that all complaints are investigated fairly and impartially.

3) This Policy aligns with the bank's commitment to uphold the highest ethical standards, transparency and accountability.

4) The objective of this Policy is also to provide necessary safeguards for the protection of the employees from reprisal or victimization for whistleblowing in good faith.

2. SCOPE:

1) Under the Policy all employees of the Bank, depositors/ borrowers / shareholders / stakeholders and public having sufficient grounds for concern can lodge the complaints. The complainant would be referred to as the "Whistleblower".

2) These complaints can pertain to the acts of omission and commission by any of the employees of any of the Branches/Departments/Head Office.

3. DEFINITION:

1) "Stakeholders" shall mean (a) customers of the Bank; (b) non-governmental organizations; (c) employees of other agencies deployed for the Bank's activities, whether working from any of the Bank's offices or any other location; (d) contractors, vendors, suppliers or agencies (or any of their employees) providing any material or service to the Bank, (e) shareholders of the Bank; and (f) any other person having an association with the Bank.

2) "Whistle Blower Committee" shall mean the Whistle Blower Committee of the Bank, as may be constituted or re-constituted from time to time and as appointed by the Competent Authority i.e. BOARD OF DIRECTORS thereby delegating its roles, powers and functions to the Whistle Blower Committee. The composition of the Whistle Blower Committee is set out in the Annexure III hereto.

3) "Ombudsperson" shall mean a senior employee with proven track record and well respected for his/her integrity, independence and fairness. The Head of Human Resource Department will be the Ombudsperson for the present and he/she will receive all the complaints under this Policy and ensure appropriate action.

4) "Competent Authority" shall mean The Board of Directors.

5) "Investigation Authority" shall mean Head of Audit Department/ Head of Risk Department.

6) "Investigation Officer(s)" shall mean any internal officer(s) of the Bank nominated by the Whistle Blower Committee / Investigation Authority to conduct an investigation under this Policy.

7) "Subject of Investigation" shall mean a person against or in relation to whom a complainant has been made and shall also include any person who becomes subject of such investigation based on evidence gathered during the course of an investigation under this Policy.

4. MAIN FEATURES OF THE POLICY:

The Policy shall cover the reporting of complaint related to the following but not limited to:

1) acts of omission and commission by any of the employees of any of the Branch/ Head Office.
2) acts that are dishonesty, theft, unethical, immoral and/or illegal.
3) actions that would amount to serious improper conduct.
4) actions that may lead to / has lead to financial frauds / incorrect and misleading financial reporting.
5) actions that are in contravention of the various policies / rules framed by the regulators / the Bank from time to time.
6) actions that are in contravention of the various policies / rules framed by the regulators / the Bank from time to time.
7) harassment, discrimination and / or unethical behavior
8) corruption, misuse of Office to obtain personal benefits / pecuniary advantage for self or any other person, criminal offence.
9) any other action that may cause harm to the reputation or financial well-being of the bank or its client.

5. PROCESS FOR COMPLAINT:

1) The complaint will be addressed to the Ombudsperson i.e. Head of Human Resource Department and he/she will receive all the complaints under this Policy and ensure appropriate action. Basically, the scrutiny of the complaints will be done by the Ombudsperson, who shall decide whether the matter needs to be referred to Whistle Blower Committee.

2) Anonymous / Pseudonymous complaints will not be usually entertained. However, if the matter is of a very serious nature, the Ombudsperson may refer the matter to Whistleblower Committee.

3) The complainant should give his/her name and address either in the complaint itself or in a covering letter. In the case of an employee making such a complaint, details such as name, designation, department, and place of posting should be furnished. Follow-up questions and investigation may not be possible unless the source of the information is identified.

4) Whistle Blowers may make complaint through any of the following modes:

   i. By letter in a closed / sealed envelope addressed to:
   The Ombudsperson
   Bassein Catholic Co-operative Bank Ltd.
   Catholic Bank Building, Papdy Naka,
   Papdy, Vasai (West) – 401207.

   ii. By way of an email addressed to: whistleblower@bccb.bank.in

5) The complainant will receive an acknowledgement on receipt of the complaint.

6) If the initial enquiries by the Whistle Blower Committee indicate that the complaint has no basis, or it is not a matter to be pursued under this Policy, it may be dismissed at the initial stage itself and the decision will be minitised & documented accordingly.

7) If there appears to be some truth in the complaint, an independent investigation will be ordered by the Audit Committee of The Board on the recommendation of Whistle Blower Committee.

8) The investigation will be carried out either by the Investigating Authority and / or any other officers as decided by Whistle Blower Committee. The investigation would be conducted in a fair manner, as a neutral fact-finding process and without presumption of guilt.

9) The frequency of contact between the complainant and the Investigating Authority will depend on the nature of the issue and the clarity of information provided. Further information may also be sought from him/her.

10) Based on a thorough examination of the findings, the Investigation Authority / officers will prepare a report of the findings which will be placed before the Whistle Blower Committee together with any other supporting documents which may be required and shall discuss the findings of the investigation with the Whistle Blower Committee.

11) After review of the investigation report and the requisite supporting documents, the Whistle Blower Committee shall take the necessary actions. In the event that the Whistle Blower Committee determines, after reviewing, examining and discussing the investigation report, the same should be placed before the Audit Committee of The Board with its own findings and recommendations (if any) for its review and to seek the necessary directions.

12) All discussions in the matter will be minuted and the final report prepared by the Whistleblower Committee.

13) Appropriate action will be initiated against the employee, wherever warranted.

14) However, if there is any complaint against any of the member of Whistleblower committee, the said member shall be excluded for the proceedings of the Whistleblower complaint.

15) Appropriate administrative steps will be taken for redressing the loss, if any, caused to the Bank, as a result of the corrupt act or mis-use of office, or any other offence covered by the Policy.

16) Criminal proceedings, if warranted by the facts and circumstances of the case, will be initiated. Corrective measures to prevent recurrence of such events in future will be taken.

17) Subject to legal constraints the complainant will receive information about the outcome of any investigation.

6. TIME FRAME:

All complaints raised by the complainant (whistleblower) should be concluded within 60 days, depending on the process of investigation and the implementation of the action, if the concern raised is proved.

7. RETENTION OF DOCUMENTS:

1) The documents collated during the investigation relating thereto shall be retained by the Bank for a minimum period of seven years.

2) The proceedings of each investigation duly reviewed/signed by the concerned Investigation Officers shall be retained for the same period as set out in (1) above for future requirement of either the Bank or any statutory authority.

8. REPORTING MECHANISM:

The Ombudsperson will provide quarterly reports on the number of complaints received and the status of each of them to the Board of Directors through the Chief Executive Officer.

9. OWNERSHIP:

The ownership of this Policy is with Human Resource Department.

10. VALIDITY OF THE POLICY:

The present Policy will be effective from date of approval by Board of Directors till the next policy is revised and ratified by Board of Directors and any amendments take place due to statutory or regulatory provisions.

11. AMENDMENTS & INTERPRETATIONS:

1) The Board of Directors reserves the right to amend or modify this Policy in whole or in part, at any time, without assigning any reason whatsoever.

2) All questions of interpretation of the Policy shall be determined by the Whistle Blower Committee and such determination shall be final and binding upon all concerned persons.

3) This Policy can be changed, modified, rescinded or abrogated at any time by the Board of Directors.

4) Administrative Amendments:

   i. Any change pertaining solely to administrative details such as the name or designation of officials, change in management hierarchy, updates to email IDs, contact information, or similar non-procedural modifications shall not require a formal amendment or review of this Policy. Such changes may be incorporated and brought into effect with the approval of the Chief Executive Officer (CEO) or the General Manager, with an intimation to the Board of Directors.

   ii. This relaxation shall not apply to any change involving policy procedures, operational practices, eligibility criteria, risk management parameters, regulatory or statutory requirements, or any modification that materially affects the substance, applicability, or governance of the Policy. All such changes shall require approval of the Board of Directors in accordance with prevailing regulatory guidelines.

12. IMPLEMENTATION OF THE POLICY:

1) This Policy will be applicable to all the Branches/ Head Office of the Bank.

2) This Policy will be displayed on the Bank's website as well as on intranet of the Bank.

13. SAFEGUARDS:

1) Confidentiality: Every effort will be made to protect the identity of the complainant subject to legal constraints except in cases where the complainant turns out to be vexatious or frivolous and action has to be initiated against the complainant. In the event of the identity of the complainant being disclosed, the Bank can initiate appropriate action against the person making such disclosure.

2) Harassment or Victimisation: Harassment or victimization of the complainant will not be tolerated and could constitute sufficient grounds for dismissal of the employees found guilty of such behaviour.

3) Malicious Allegations: Motivated / vexatious complaints made under this scheme may result in disciplinary action

4) Exclusions:
   i. Policies and guidelines issued by the Bank from time to time are outside the purview of this policy.
   ii. In case of anonymous complaints, the Ombudsperson shall scrutinize and decide or not, to take any action in the matter.
   iii. Employment related concerns i.e. salary, perquisites, leave, Leave Travel Concession. Promotion, Transfer, Performance Appraisal, Incentive etc should be reported through normal channel meant for the purpose and which are not covered under Whistle Blower Policy.
   iv. Matters which are pending before a court of law, tribunal, other quasi- judicial bodies or any governmental authority.

14. RESPONSIBILITIES AND ACCOUNTABILITY:

Investigating Authority / Officers	1) Conduct the enquiry in a fair, unbiased manner. 2) Ensure complete fact-finding. 3) Maintain strict confidentiality. 4) Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom.
Ombudsperson	1) Ensure that the Policy is being implemented in the true spirit. 2) Ascertain prima facie the credibility of the charge. If the initial enquiry indicates that further investigation is not required, place the issue before Whistle Blower Committee for review & closure. 3) Document the initial enquiry and closure decision of the Committee. 4) Where further investigation is indicated, carry this forward, through the Whistle Blower Committee. 5) Acknowledge receipt of the concern to the complainant. 6) Ensure that necessary safeguards are provided to the complainant. 7) Provide quarterly reports through Chief Executive Officer to the Board of Directors regarding the complaints received and the status thereof.
Whistleblower Committee	1) Recommend an appropriate course of action, suggest disciplinary action, including dismissal, and preventive measures and present the same to the Audit Committee of The Board. 2) Minute the deliberations in the meetings and document the final report. a) If any member of the Whistle Blower Committee has a conflict of interest in any given case, then he/she shall be recused and the other members of the Committee will deal with the matter on hand. b) In the matter of any complaint against Senior Management of the Bank, the Audit Committee of The Board keeping in view seriousness of allegations, may constitute a committee to carry out the investigation and submit the report to Board of Directors through Chief Executive Officer.

Chief Executive Officer	1) To place the quarterly reports from the Whistle Blower Committee/ Ombudsperson. 2) Ensure the necessary implementation of the Recommendations of the Whistle Blower Committee.
Subject of Investigation	1) Provide full co-operation to the Investigation team. 2) Be informed of the outcome of the investigation. 3) Accept the decision of the Whistle Blower Committee / Executive & HR Committee of the Board. 4) Maintain strict confidentiality.

Seema

Seema Colaco
Assistant General Manager - HR

Mahesh Phadke
Chief Executive Officer

OMBUDSPERSON CONTACT DETAILS

OMBUDSPERSON: Head of Human Resource Department

CONTACT DETAILS:

ADDRESS:
Bassein Catholic Co-operative Bank Ltd.
Catholic Bank Building, Papdy Naka,
Papdy, Vasai (West) – 401207.

TELEPHONE NO.: +91 7719046677

E-MAIL: **whistleblower@bccb.bank.in**

ANNEXURE II

WHISTLE BLOWER COMMITTEE MEMBERS

1. Chief Executive Officer: Chairman
2. Ombudsperson: Member
3. General Manager: Member
4. Head-Legal: Member
5. Head-Internal Audit: Member
6. Head-Risk Management: Member

Quorum of minimum 3 required for any meeting.
Frequency: As and when complaint is received.

PROCESS FLOW