

WHISTLE BLOWER POLICY FOR THE YEAR 2023-24

WHISTLE BLOWER POLICY - REPORTING IRREGULAR PRACTICES IN ANY OPERATIONAL AREAS INCLUDING FRAUDS & MALPRACTICES AT BRANCHES/ OFFICES

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 DEFINITIONS & MODE OF MAKING COMPLAINT

2.1 DESIGNATED AUTHORITY UNDER WHISTLE BLOWER POLICY

The Chief General Manager [in his absence General Manager (Overseeing IR Section)], H R Wing, Head Office, will be the "Designated Authority".

2.2 AUTHORIZED OFFICIAL UNDER WHISTLE BLOWER POLICY

An officer not below the level of Deputy General Manager / Assistant General Manager of HR Wing, authorized by the Designated Authority for receiving and handling of whistle blower complaint.

2.3 MODE OF MAKING COMPLAINT

2.3.1 Any complaint under this Policy shall be addressed to the Chief General Manager (in his absence General Manager, Overseeing IR Section), HR wing, Head Office, the Designated Authority in the prescribed format enclosed as ANNEXURE-I.

2.3.2 The employees of the Bank may make the complaint through following modes:

*a. Through SAS package under the path **Quick Links > SAS Biometric Login > General > Whistle Blower Complaint** in Cannaet on validation of OTP received by the staff on his registered mobile number.*

b. Written complaint in a closed/secured envelope shall be addressed to the Designated Authority at the following address:

*The Chief General Manager
Human Resources Wing
Canara Bank, Head Office
112, J C Road, Bengaluru-560 002*

3 ROLES AND RESPONSIBILITIES:

3.1	Procedure for handling of complaints 3.1.1 In case of complaints received through SAS package:
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3.1.1.1 The SAS package will be directly accessed by the Designated Authority/ Authorized Official.

3.1.1.2 Identity of the complainant need not to be established as it is confirmed at the time of submitting the complaint through OTP authentication.

3.1.2 In case of complaint received through physical mode:

3.1.2.1 In case of complaints submitted in physical form, the envelope shall be superscribed with **“Complaint under the Whistle Blower Mechanism”**. If the envelope is not superscribed 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.

3.1.2.2 All such envelopes will be opened by the Authorized Official in presence of the Designated Authority only.

3.1.2.3 The identity of the complainant would be confirmed by the Authorized Official by writing a letter to him/her. Sample of the letter is enclosed as ANNEXURE-II.

3.1.2.4 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 superscribed with **“Complaint under the Whistle Blower Mechanism.”** If the envelope is not superscribed 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.

3.1.2.5 In case the identity of the complainant is not confirmed, the complaint will be treated as anonymous/pseudonymous and will not be entertained.

3.1.2.6 After the identity of the complainant is confirmed the Authorized Official shall enter the details in SAS package.

3.2 PROCEDURE TO BE ADOPTED AFTER ESTABLISHING THE IDENTITY OF COMPLAINANT:

3.2.1 On receipt of complaints through SAS package or where the identity of complainant is confirmed in case of physical form, the Authorized Official 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.

- 3.2.2 The complaint received through SAS package/original complaint received through physical mode would be kept in a safe/almirah duly ensuring dual custody. The custody of the almirah will remain with the Authorized Official and at no point of time the complaint can be accessed except by the Authorized Official/ Designated Authority.
- 3.2.3 Apart from physical form, the record of all the complaints received through SAS package/physical mode under this policy shall be recorded by the Authorized Official in SAS package which is developed to maintain the list of complaints and their progress.
- 3.2.4 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 Circles. (Separate file may be maintained for complaints under Whistle Blower Mechanism).
- 3.2.5 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
- 3.2.6 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 Authorized 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.
- 3.2.7 On receipt of the report, the concerned Authorized Official will place the matter to the 'Designated Authority'. The Designated Authority may take a call on the matter and take appropriate action as per Bank norms.
- 3.2.8 In case of serious complaints of irregularities, the Designated Authority shall order a detailed investigation into the matter.
- 3.2.9 On receipt of the Investigation Report, the same shall be scrutinized by the Fraud Analysis and Recommending Committee (FARC) [formerly, 5 General Managers' Committee] constituted as per Fraud Risk Management Policy for monitoring frauds taken place in the Bank, for initiating further action in the matter.
- 3.2.10 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".

	<p>3.2.11 <i>The Authorized Official shall maintain a separate list for the complaints received under the Policy and enter the information in the SAS package and monitor their progress periodically and put up the same to the 'Designated Authority every 2 weeks.</i></p> <p>3.2.12 <i>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.</i></p>
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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.*
- 4.3 *Wherever, it is found that the complainant has made similar complaint to any other forum the complaint will not be treated as whistle blower complaint, as it will not be possible to protect the identity of the complainant.*

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 Wing along with 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.

9 GENERAL PROVISIONS/ EXCEPTIONS:

9.1 Anonymous/ pseudonymous complaints will not be entertained in terms of Central Vigilance Commission guidelines.

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 whistleblower. 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 Canara Bank Officer Employees' (Discipline & Appeal) Regulation, 1976 or Chapter XI of Canara Bank Service Code, or any such disclosure which is subjudice or being enquired by law enforcing agencies.

10 REGULATORY PRESCRIPTION:

This Whistle Blower Policy is based on the provisions of Companies Act, in compliance clauses of listing agreement of SEBI and RBI Directions.

11 MAKING MODIFICATIONS / ISSUING CLARIFICATIONS:

The Managing Director & CEO or in his absence, the Executive Director, 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.

ANNEXURE - I
WHISTLE BLOWER COMPLAINT FORM

Code No.		Date of filing complaint		Initial of Designated Authority	
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(For use of Designated Authority, do not write anything above it)

(FOR USE OF ALL THE STAFF OF CANARA BANK)

To
The Chief General Manager
HR Wing
Canara Bank
Head office
112 J C Road
Bengaluru

A. PERSONAL INFORMATION OF WHISTLE BLOWER

1. Name: _____
2. Staff No.: _____
3. Mobile No.: _____
4. Email ID (Optional): _____
5. Branch: _____ DP Code _____
6. Address: _____
7. Regional Office: _____
8. Circle: _____
9. Person against whom the complaint is made: As per enclosed sheet
10. Gist of Complaint: As per enclosed sheet
11. Complaint letter and supporting document (if any): Attachment _____
12. ID Proof of the Whistle Blower (Mandatorily to be enclosed): _____
13. Date: _____
14. Place: _____

DECLARATION

I declare that the above information furnished under Whistle Blower Policy is true and correct. I am aware that in case of wrong complaint, I am liable for disciplinary action as per policy. I confirm that, I have not made any similar/identical allegations of corruption/misuse of office to any other authorities to qualify as a 'Whistle Blower Complaint'.

Date:

Place:

[SIGNATURE OF EMPLOYEE]

ANNEXURE - II

CONFIDENTIAL

Speed post/Registered post

To,

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 the 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