Whistleblower Policy

1.0 Policy Statement

Sarvodaya Ashram is committed to fostering a culture of **integrity**, **accountability**, **and ethical conduct**. This Whistleblower Policy (the "Policy") is a testament to that commitment, providing a secure and confidential mechanism for all stakeholders to report genuine concerns about potential wrongdoing without fear of retaliation. This Policy is fully compliant with the **Whistle Blowers Protection Act**, **2014**, and other relevant Indian laws, which recognize the critical role of whistleblowers in promoting transparency and good governance. We believe that open communication is not only a moral imperative but also a key deterrent against misconduct, ensuring the protection of our organization's reputation, assets, and mission.

2.0 Scope and Applicability

This Policy applies to all individuals and entities associated with Sarvodaya Ashram, including but not limited to:

- All employees, including permanent, temporary, and contractual staff.
- Contractors, vendors, consultants, and suppliers.
- Volunteers and interns.
- Board members and committee members.

The Policy's provisions extend to any activity or event related to the organization's work, regardless of the physical location.

3.0 Reportable Conduct

This Policy encourages the reporting of a wide range of concerns, referred to as "protected disclosures," which include, but are not limited to:

- Financial Misconduct: This includes fraudulent financial reporting, manipulation
 of accounting records, embezzlement, misappropriation of funds, or any other
 accounting irregularities.
- **Violations of Law:** Any suspected breach of Indian laws, regulations, or statutory norms, including but not limited to the Prevention of Corruption Act, 1988, or the Indian Penal Code, 1860.
- **Conflicts of Interest:** Undisclosed or unmanaged conflicts of interest that could harm the organization's integrity.
- **Policy Violations:** Serious breaches of internal policies, such as the Anti-Corruption Policy, Anti-Bribery Policy, or the Sexual Harassment Policy.

- **Health, Safety, and Environmental Hazards:** Any activity that poses a significant risk to public health, employee safety, or the environment.
- **Misconduct and Ethics Violations:** Any unethical or improper behavior by an employee, manager, or third-party associate, including discrimination, harassment, or abuse of authority.

4.0 Reporting Procedure

Sarvodaya Ashram has established clear and accessible channels for reporting concerns:

4.1. Confidential Reporting

Whistleblowers are strongly encouraged to submit their concerns in writing to the **Designated Officer**, Ms. Kusum Jauhari, Secretary of Sarvodaya Ashram. The communication should be as detailed as possible, including:

- The nature of the concern.
- · Specific individuals or parties involved.
- The time and location of the alleged incident.
- Any supporting evidence, documentation, or names of witnesses.

Providing this information will significantly aid in a thorough and timely investigation. The identity of the whistleblower will be kept confidential to the maximum extent permitted by law.

4.2. Anonymous Reporting

While providing identity is helpful for investigation, this Policy respects the right to **anonymous disclosures**. The organization will make every effort to investigate anonymous reports, provided sufficient information is available to warrant an inquiry.

5.0 Protection from Retaliation

Sarvodaya Ashram guarantees **complete protection from retaliation** for any individual who makes a good-faith report under this Policy. Retaliation includes, but is not limited to, demotion, suspension, termination, harassment, discrimination, or any other form of adverse employment action. Any employee or stakeholder found to have engaged in retaliatory behavior will face severe disciplinary action, which may include termination of employment or legal action.

6.0 Designated Officer and Disclosures Committee

6.1. Designated Officer's Responsibilities

The Designated Officer, as the primary point of contact, is responsible for:

- Receiving and acknowledging all protected disclosures.
- Conducting a **preliminary assessment** to determine if the report falls within the scope of this Policy and warrants an investigation.
- Initiating and overseeing a fair, impartial, and timely **investigation**.
- Taking appropriate measures to protect the confidentiality and identity of the whistleblower throughout the process.

6.2. Disclosures Committee

A **Disclosures Committee**, comprising senior executives and board members, will be responsible for reviewing the Designated Officer's investigation findings. The committee will:

- Ensure the investigation was thorough and unbiased.
- Determine the validity of the reported concern.
- Decide on appropriate corrective and disciplinary actions.
- Oversee the implementation of these actions while ensuring the whistleblower's protection.

7.0 Investigation and Disciplinary Action

- **Investigation:** All investigations will be conducted promptly and in a manner that ensures due process. The process will be thoroughly documented, and all relevant details, findings, and actions taken will be recorded and maintained.
- **Disciplinary Action:** Any individual found guilty of the reported misconduct or wrongdoing will be subject to appropriate disciplinary action, which may include suspension, termination of employment, and legal action, including recovery of losses suffered by the organization.

8.0 Prohibited Activities and Disclaimer

This Policy is intended to protect individuals who make genuine, good-faith reports. It does **not** protect individuals who:

- Make reports with **malicious intent** to harass or defame others.
- File complaints to settle personal grievances.

• Knowingly report false or misleading information.

Such actions will be treated as a violation of this Policy and may result in disciplinary action.

This Policy is not an employment contract and does not create any contractual rights. It is subject to review and update as necessary to ensure continued compliance with relevant laws and best practices.

9.0 Contact Information

For any whistleblower concerns or protected disclosures, please contact:

Ms. Kusum Jauhari

Secretary,

Sarvodaya Ashram

Mobile: 9450941936

Email: sashram.hardoi@gmail.com



