

# **WHISTLE BLOWER** **POLICY**

**For the Financial Year 2025-26**

# **KARNATAKA GRAMEENA BANK**

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

### **BASED ON “PUBLIC INTEREST DISCLOSURES & PROTECTION OF INFORMER (PIDPI) RESOLUTION**

#### **PREAMBLE**

The Government of India, Ministry of Personnel, Public Grievances and Pensions, Department of Personnel and Training published in the Gazette on 21<sup>st</sup> April, 2004 the “Resolution” viz. GOI Resolution on the Public Interest Disclosure & Protection of Informers (PIDPI) and issued guidelines thereon authorizing the Central Vigilance Commission (CVC), as the Designated Agency to receive written complaints for disclosure on any allegation of corruption for misuse of office and recommend appropriate action. Bank, being a Banking Company established under the Central Act is coming under the jurisdiction of the CVC for the said purpose. In accordance with the aforesaid Resolution of the Government of India, the CVC has formulated norms for acceptance of complaints under the PIDPI Resolution and for keeping identity of the complainant secret. As a Scheduled Bank, Established by Govt. of India, sponsored by Canara Bank coming under the purview of PIDPI Resolution as modified vide OM No.371/4/2013 AVD-III dated 14.08.2013, 03.09.2013, Gazette Notification dated 29.08.2013 and OM NO.371/4/2013-AVD-III dated 16.06.2014, Bank is required to give wide publicity to the procedure for handling complaints under PIDPI Resolution to the Employees, Officers and general public the norms thus laid down by the CVC and this Policy is intended to provide for the same.

#### **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 the various stake holders/ persons to report unethical practice, frauds, if they observe in any operational area. The policy has been put in place to provide a framework to persons 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 PROCEDURE TO BE FOLLOWED BY WHISTLE BLOWERS:**

2.1 Notwithstanding anything contained in the Official Secrets Act, 1923, any public servant other than those referred to clause (a) to (d) of Article 33 of the Constitution or any other person including any non - governmental organization, may make a written disclosure to the Designated Authority.

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2.2 The complaint should be in a closed/secured envelope and should be addressed to the General Manager & Vigilance Officer (GM & VO), Vigilance Cell of the Bank who is the “Designated Authority” at the following address:

The General Manager &  
Vigilance Officer,  
Karnataka Grameena Bank,  
Vigilance Cell, Head Office,  
Sangankal Road B No 55, Gandhinagar  
Ballari-583103.

### 3 ROLES AND RESPONSIBILITIES:

3.1 Procedure for handling of complaints under the Public interest disclosure and Protection of Informers (PIDPI) Resolution dated 21.4.2004 to be followed by the designated authority (VOs or Ministries/Departments).

3.1.1 The 'Designated Authority' i.e. GM & VO shall authorize an officer not below the level of Chief Manager / Senior Manager of Vigilance Cell for receiving complaints under the PIDPI Resolution.

3.1.2 The envelope should be super scribed with **“Complaint under The Public Interest Disclosure”**. If the envelope is not superscribed as mentioned above, it will not be possible to protect the complainant under the above resolution and the complaint will be dealt with as a normal complaint. The complainant should 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 contain as full particulars as possible and shall be accompanied by supporting documents or other materials.

3.1.3 All such envelopes will be opened by an authorized official (i.e., Chief Manager/Senior Manager in Vigilance Cell) in the presence of GM & VO.

3.1.4 The identity of the complainant would be confirmed by the Chief Manager/Senior Manager in the Vigilance Cell by writing a letter to him/ her. Sample of the letter is at Annexure-I.

3.1.5 The Whistle Blower/ Complainant will be required to confirm within 30 days of receipt of letter that he had sent the complaint and also confirm / certify that he 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 Public Interest Disclosure”**. If the envelope is not superscribed as mentioned above, it will not be possible to protect the complainant under the above resolution and the complaint will be dealt with as a normal complaint.

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3.1.6 After the identity is confirmed, the Chief Manager/Senior Manager of Vigilance Cell so authorized will ensure that the identity of the complainant is removed from the body of the Complaint and the dummy complaint given a number along with central registry diary number with which the original complaint can be traced back. Further action on complaint will be initiated by following the procedure as laid down in PIDPI Resolution / Guidelines issued by Government /CVC from time to time.

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 and at no time that complaint can be accessed without proper authority from the '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 any quarters. (Separate files may be opened for each complaint).

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. However, in case of serious complaints of irregularities in these matters, the same shall be brought to the notice of Chairman of the Bank for taking appropriate action.

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 "Designated Authority". If no reply is still received, the second reminder after 2 weeks should be sent at the level of the Chief Manager/Senior Manager of Vigilance Cell. 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 Vigilance Cell will put up the matter to the 'Designated Authority' who shall order for investigation into the complaint and investigation report is to be received within two weeks.

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 Internal Advisory Committee (IAC) constituted as per Staff Accountability Policy for initiating further action in the matter.

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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 should maintain a separate list for the complaints received under the 'PIDPI Resolution' 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' should 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 In case a complainant seeks protection and reports that his life is in danger, the 'Designated Authority' would examine the same and send his recommendation to the CVO/CVC and provide security cover to the Whistle Blowers.

### **4 DISQUALIFICATIONS:**

- I. 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.
- II. 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 GM & VO along with the outcome shall be placed before the Board of Directors of the Bank by Vigilance Cell.

### **6 PUBLICATION:**

The Policy will be posted on the Bank's website and Intranet and a copy of the Policy shall be displayed by all Branches / Offices of the Bank at a prominent place inside the Bank's premises, where customers / general public frequent.

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### **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 :**

- I. Anonymous/ pseudonymous complaints will not be entertained.
- II. 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.
- III. 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.
- IV. The Designated Authority shall not entertain or inquire into any disclosure in respect of which a formal inquiry has been ordered as Staff Service Regulations 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 Government of India Resolution on “Public Interest Disclosures & Protection of Informer” (PIDPI) in the Bank as communicated by CVC and also in compliance clauses of listing agreement of SEBI.

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

The Chairman or in his absence, the General Manager & Vigilance Officer, shall be competent to make any changes, issue clarification with respect to the policy in tune with the Government Guidelines / Central Vigilance Commission / Chief Vigilance Officer Guidelines issued from time to time.

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**ANNEXURE-I**

**CONFIDENTIAL**

Speed post/Registered post

To,

Sir,

.....  
.....  
.....

1. Please refer to your complaint dated received in this Cell on ..... under "Public Interest Disclosure & Protection of Informer Resolution (PIDPI)".
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.

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**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

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### DISCLAIMER

**Whistle Blower Policy for the Financial Year 2025-26:** Any mandated additions as per guidelines from NABARD, RBI, DFS, Sponsor Bank, or any other regulatory bodies, as well as subsequent amendments or modifications communicated post-adoption, seamlessly integrate into this Policy. The Bank is committed to comply with all additional policy requirements as they arise.

**Validity of the Policy:** This policy comes in to effect immediately and shall be valid until the next review of the policy by the Board of Directors & adoption of the same by the Bank.