

WHISTLE BLOWER POLICY

1. OBJECTIVE OF THE POLICY

To uphold the values of the organization and proactively plug the gaps to maintain robustness of the system and procedures.

The scope aims to

- Prohibit and proactively target issues linked to employee integrity
- Formalize a channel for communicating such issues faced by employees at workplace
- Ensure an effective redressal mechanism
- To investigate, resolve and record the incidents reported
- To recommend and execute the decision made
- To communicate the redressal steps taken against the practice
- To initiate steps which incorporate the learning from the incident

2. BACKGROUND

India Shelter Finance Corporation is at its growth phase, with nearly 60 branches and close to 500 employees working in various branches and geographies across India in the FY 2016-17.

The core values of INDIA SHELTER are, HARDWORK, RESPECT & HONESTY. These are all non-negotiable values for any employee working in the Organization. Any dilution of this values by any employee, results in a reputation risk for the company, as well as a violation of our own culture and value system.

This policy clarifies what HONESTY means to all of us and communicates a Whistle Blowing charter for INDIA SHELTER.

HONESTY means, a transparent and honest approach in all our actions. Being upfront and courageous in whatever we do. Not allowing personal gain, to cloud our judgment and decision-making and all the actions, which we take on behalf of INDIA SHELTER.

HONESTY also means not only doing all of the above, but also not letting anyone else violate this value.

Today we are a large and complex organisation, as well as a growing one, and this sometimes makes it difficult for employees to know whom to contact and where to report when they see something happening which they feel should not happen or is wrong or is in violation of Core values of India Shelter.

To cater to this NON NEGOTIABLE VALUE, we are forming a group called “INDIA SHELTER WHISTLE BLOWING COMMITTEE” (ISDC) which will investigate all such cases and give their decision post all fact findings. This committee has been formed by the Board of Directors and may incorporate other employees on case specific basis.

3. INVESTIGATION COMMITTEE

Keeping in mind the core value of the Company, we would follow a structured process of investigation. The committee appointed by the Organization comprises of:

1. Whistle Blower Committee Members (ISWC) formed by Board

- Director HR - Mr. Devraj Dutta
- Head Compliance & Operations - Mr. Yogesh Jain
- Head Internal Audit – Mr. C P Sanadhya

2. Additional Committee Members (ACM)

- Either of two RBMs/RCM (as per availability & importance) – By monthly rotation as per calendar published by Director HR
- Resources from HO would also be involved to investigate

The ISWC would investigate all complaints and take appropriate decision basis facts for both the Employees and the Organization. In-case, there are any complaints in the area of function or geography of the committee member, the additional members would investigate and form their findings and decision. Post all information gathering and consultation, ISWC would take the final decision and conclude.

4. COMPLIANT MECHANISM

If anyone wishes to communicate on any such matter, she/he may directly write to the following id in his own name, anonymously or pseudonymously–

devraj.dutta@indiashelter.in

yogesh.jain@indiashelter.in

cp.sanadhya@indiashelter.in

or call any of the ISWC committee members / call helpline number 1800-532-4444.

5. PROCEDURE / ACTION

All complaints of such nature will be investigated promptly and in an extremely confidential manner by the Committee. *INDIA SHELTER will ensure confidentiality of the name of the person writing in and also give him/her all protection if required.*

It will endeavour a resolution of each complaint within 7 working days.

Any employee who is found to have compromised on his VALUES will be subject to appropriate disciplinary action, up to and including dismissal from the services of the Organization.

It is expected that the person writing in on this email id, puts down his name, role and location of working.

6. STANDARD OPERATING PROCEDURE

1. Complaint received through sources. They could largely be through:
 - Mail to committee
 - Anonymous complaint to Company
 - Through Call Centre - 1800 532 4444
 - Through third parties - Auditors, vendors, NHB, other employees etc
2. Once complaint is received it shall be logged into the log-sheet with a brief summary
 - Log-Sheet shall be updated on a regular basis
 - It shall contain all details about the case
 - Along with log-sheet, case files shall also be maintained
3. Investigation will be conducted with the aid of calling to customers, calling to employee/people related to case, if required, visit to the place, analysis of data from salesforce / other sources
 - Calls made for investigation as records need to be saved

- Emails received need to be documented
 - Visit written feedback, if taken, would be documented
 - Data analysis must be documented
 - Standard format to be devised
4. Once investigation is complete then decision shall be taken. Decision could be of form:
- Caution Letter for negligence of process and procedure
 - Warning Letter for process and policy
 - Termination for cases in connection to Integrity / money
5. The decision shall be implemented by the Human Resource Department:
- Caution letter shall be issued by Head of Department
 - Warning Letter shall be issued by Member ISWC with CC to HoD
 - Termination Letter shall be issued Head-HR with CC to HoD
- *- All of these should be marked to HR and to ISWC email.
6. The decision taken shall be informed to the complainant through email / letter
7. As a preventive measure following steps to be initiated
- Respective departments would be given feedback for augmentation/introduction of processes and the same needs to be built and implemented within 14 working days from submission.
 - Fortnightly messages (text & poster & video) shall be shared on whatsapp groups to exhort employees to follow the Core values of the Company
 - Value Session will be taken by Leaders travelling to branches and propagating whistle blowing policy
 - In all training sessions
 - Examples will be provided
 - Contact details of the Email Id / Helpline numbers will be given

CAUTION

An allegation of loss of INTEGRITY & VALUE is a serious charge and hence employees should refrain from making false claims or allegations of such nature.

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