

Whistle Blower Policy

GUIDELINES 2025-26

WHISTLE BLOWER POLICY

Narayan Seva Sansthan values of serve the humanity through integrity, commitment, passion, seamless and speed are the foundation for all actions and for the decisions we take. They set standards for the sansthan and for it human capital (we called sadhak & sadhikas) conduct.

1.Purpose of this policy

The purpose of this policy is to articulate the sansthan point of view on Whistle blowing, the process, and the procedure to strengthen whistle blowing mechanism at the sansthan.

1.1. Provides a platform and mechanism for the Sadhak & sadhikas and all senior managerial people to voice genuine concerns or grievances about unprofessional conduct without fear of retaliation.

1.2. It provides an environment that promotes responsible and protected whistle blowing. It ~~ends~~ the sadhak & sadhikas and others senior about their duty to report any suspected violation of any law that applies to the Sansthan and any suspected violation of the Sansthan Values or the Sansthan's Code of Conduct.

1.3. Above all, it is a dynamic source of information about what may be going wrong at various levels within the Sansthan and which will help the Sansthan in realigning the processes and take corrective actions as part of good governance practice.

2.Coverage of this policy

2.1. This policy is applicable to all the Branches /center in India, including all Sadhak & sadhikas and others senior professionals.

2.2. This policy is equally applicable to Third parties to report a concern related to a potential violation of the Sansthan Code of Conduct.

3.Who is a whistle Blower?

3.1. Any Sadhak & sadhikas or Working on senior level who discloses or demonstrates an evidence of an unethical activity or any conduct that may constitute breach of the sansthan's Code of Conduct or Sansthan's Values. This whistleblower has come to the decision to make a disclosure or express a genuine concern grievance/allegations, after a lot of thought.

or

3.2. Who is a "Whistle blower"? A whistle blower is any individual who provide the right information to the right people. Stated differently, lawful whistle blowing occurs when an

individual provides information that they reasonably believe evidences wrongdoing to an authorized recipient

4. Protection

4.1. The process is designed to offer protection to the whistleblower (Sadhak sadhikas & Senior level position in Sansthan) provided that the disclosure made / concern raised / allegations made (“complaint”) by a whistleblower is in good faith and the alleged action or non-action constitutes a genuine and serious breach of what is laid down in the Sansthan Values and/or Sansthan’s Code of Conduct.

4.2. The Sansthan affirms that it will not allow any whistleblower to be victimized for making any complaint. Any kind of victimization of the whistleblower brought to the notice of the Management will be treated as an act warranting disciplinary action.

4.3. As a Sansthan, we condemn any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against the whistleblowers. Complete protection will be given to the whistleblowers against any unfair practices like retaliation, threat or intimidation or termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the whistleblower’s right to continue to perform his/her duties/functions in a free and fair manner.

5. Reporting in Good faith

5.1. Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to validate the complaint and not complain merely on hearsay or rumor. This also means that no action should be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

5.2. However, if a complaint, after an investigation proves to be frivolous, malicious or made with secret intent/motive, the Value Standards Committee should take appropriate disciplinary or legal action against the concerned whistleblower.

6. List of prohibition

6.1. The following types of complaints will ordinarily not be considered and taken up:

- 6.2.** Complaints that are Illegible, if handwritten
- 6.3.** Complaints that are Insignificant or frivolous in nature.
- 6.4.** Matters which are pending before a court of Law, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body
- 6.5.** Any matter that is very old from the date on which the act constituting violation, is alleged to have been committed.
- 6.6.** Issue raised, relates to service matters or personal grievance (such as increment, promotion, appraisal etc.) also any customer/ service related grievance.

7. Dealing with concealment

7.1. A whistleblower may choose to keep his/her identity nameless. In such cases, the complaint should be accompanied with strong evidence and data.

8. Confidentiality

8.1. The management of sansthan will treat all complaints in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the whistleblower is important, it may be disclosed, on a 'need-to-know-basis', during the investigation process and only with the prior approval of the whistleblower.

9. Procedure for raising a Complaint

9.1. Whistleblower can make a complaint in multiple ways:

9.2. Can write to the Disciplinary Action Committee / management of sansthan. Head of Human Resource department or direct to trustee of sansthan. The information may be sent vis/ letter / e mail/ what's apps or with physical presence.

9.3. By writing to the Any Trustee or Board of trustee's or Group Head or to any senior level of working professional in the sansthan.

9.3. In exceptional cases, the complainant can directly report his/her complaint to the president of the Sansthan.

10. Guidelines for communication and implementation of this policy

10.1. It is the responsibility of the Head of human resource of the Sansthan to ensure that the updated names and emailid of the various Group Head and Centre or Branch Head is made available to all Sadhak & sadhikas through the local intranet and/or any other communication mechanism they may adopt.

10.2. This policy is equally applicable to Third parties who may wish to report a concern related to a violation / potential violation of the Sansthan Values or the sansthan Code of 4 | Page

Conduct.

Annexure -1 Template for reporting Violation

Annexure -1

To _____

Please select the applicable incident type(s) from the list below best describes the issue(s) You are reporting, please note that multiple issue can be selected **tick on boxes**

1	Misappropriation of sansthan Assets or resources	
2	Inappropriate sharing of confidential information	
3	Financial fraud of any nature	
4	Violation of any policies	
5	Inaccurate financial reporting	
6	Bribery & corruption	
7	Data leak / or data sharing for unauthorized used	
8	Others form of harassment- victimization, Bullying, Discrimination	
9	Misuse of authority	
10	Others kind of conspiracy to damage the reputation of sansthan	
11	Theft and robbery	
12	others	

Please provide name's designation and department of the person(s) involved

Sr No	Name	Department	Designation

When did the incidence occur? (please provide tentative date if you do not know the exact date)

Please confirm the location of Incident

How did you find about this incident?

How long has this been occurring for?

Less than a month | 1-6 Months | 6-12 Months | More than 12 months

Please provide a details description of incident. To enable the sansthan to act on your complaint, you are requested to provide specific information, where possible, please include name(s) location, date, time etc.

Write details

Do you have any evidence in support of your allegations?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

Is anyone else aware of this incident?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

Is there any additional information that would facilitate the investigation of this matter?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

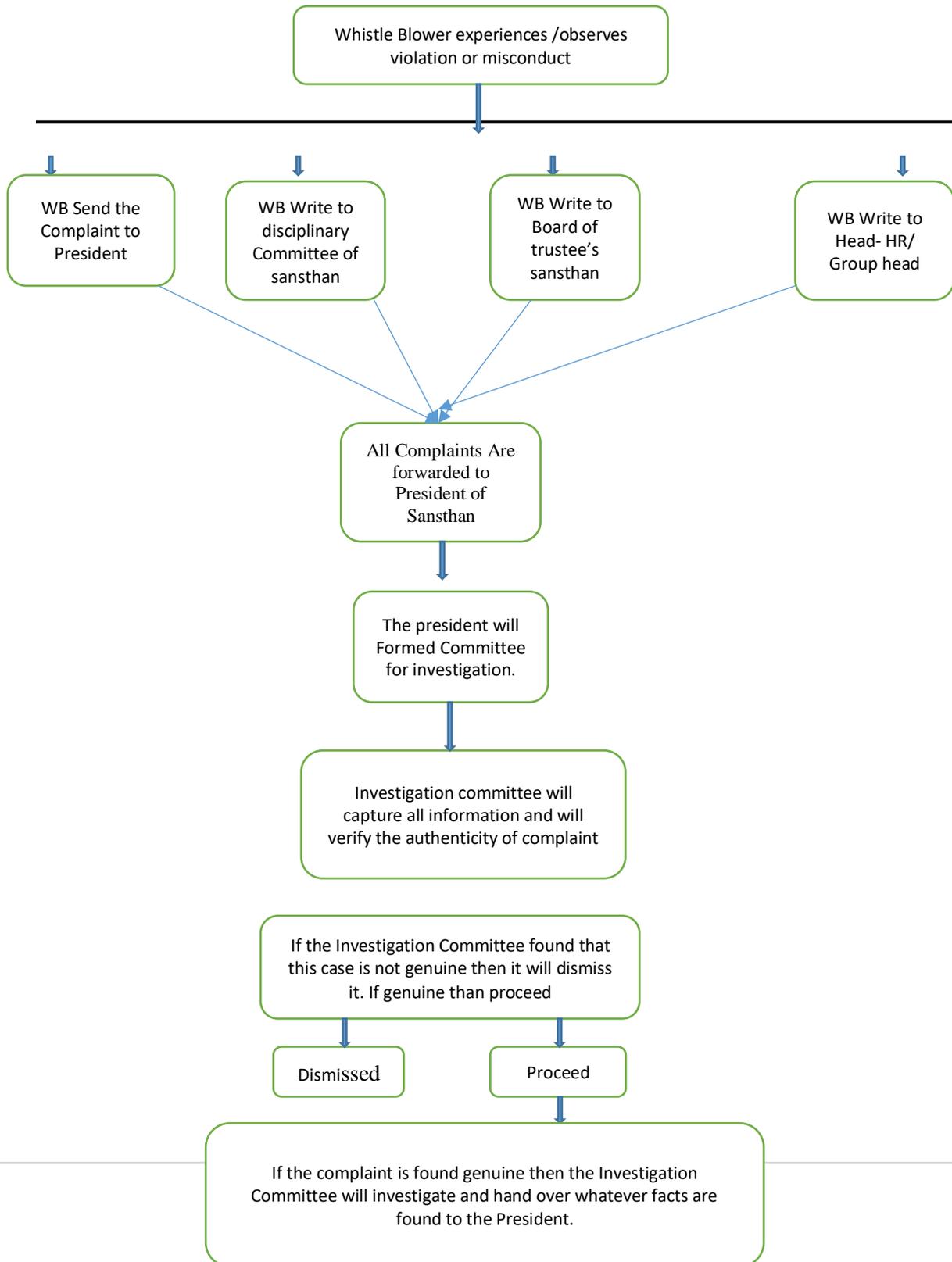
Have you reported this incident to anyone in the Sansthan?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

Date:	
Location:	
Name of the person reporting	
Contact Information	

Annexure-2

Annexure -2 sample Workflow for reporting, resolving and closing a complaint



Version	Prepared By	Approved By
1.0	HR Department	President NSS