

Whistle Blower Policy

1. Preamble

The Bank is committed to maintaining the highest standards of ethics, integrity, accountability, and transparency. To strengthen good governance and prevent reputational, financial, or operational risks, the Bank encourages prompt reporting of any suspected misconduct or unethical behavior.

2. Scope

This Policy applies to reporting of any suspected misconduct, unethical behavior, violation of laws or regulations, or breach of internal policies, including but not limited to:

- a) Fraud, corruption, theft, embezzlement, diversion of funds, or creation of false documents.
- b) Collusion, manipulation, or actions that undermine legal, regulatory, or internal control frameworks.
- c) Wilful violations of KYC/AML norms or acts intended to provide undue benefit to customers or third parties.
- d) Breach of contract or service terms with customers or vendors.
- e) Harassment, coercion, sexual misconduct, abuse, or inappropriate behavior involving employees, service recipients, or service providers.
- f) Unethical, improper, or immoral conduct.
- g) Suppression, destruction, or concealment of material information related to wrongdoing.

3. Objective

The objective of this Policy is to:

1. Encourage employees, management, and directors to report suspected violations of law, regulations, or Bank policies.
2. Provide a fair, transparent, and confidential process for reporting concerns.
3. Protect whistle blowers from retaliation, victimization, or adverse employment consequences.
4. Strengthen the Bank's internal control environment and promote early detection and prevention of misconduct.

4. Competent Authority

The Managing Director/ Chief **Executive Officer (CEO)** shall act as the **Competent Authority** for receiving and handling protected disclosures under this Policy. Complaints against the CEO shall be handled by the HOIA.

5. Individuals who could be Whistle Blower

The following individuals may report concerns under this Policy:

- Directors of the Bank
- Employees (permanent, probationary, contractual, or temporary)
- Outsourced staff engaged at Bank branches or offices
- Vendors, suppliers, contractors, and their employees Shareholders.

6. Whistle blower Disclosure

The Bank provides a safe environment to report unethical practices or misconduct occurring in any department, branch, or office.

Disclosures must be based on reasonable belief and supported by facts or observations. All disclosures received by the Competent Authority will be treated as matters of public interest.

The whistle blower must confirm that the same complaint has not been reported to any external authority during the preceding 30 days.

Complaints must be submitted in writing or via email, as specified in this Policy.

The Competent Authority may request additional information if required.

Complaints with unverifiable identity or fictitious details will not be acted upon.

Anonymous complaints will not be accepted.

Complaints against the CEO must be addressed to the HOIA.

7. Whistle blower's Role

The whistle blower's responsibility is limited to reporting suspected misconduct.

The whistle blower is not responsible for conducting the investigation or determining corrective action.

The whistle blower shall not engage in follow-up, influence the investigation, or seek access to internal discussions.

8. Inquiry into the Complaint by Competent Authority

The Competent Authority will maintain strict confidentiality of the whistle blower's identity. A preliminary review will be conducted within **30 days** to determine whether the matter warrants investigation.

If the complaint lacks adequate evidence, the Competent Authority may close the matter with appropriate justification.

If the disclosure appears credible, it will be forwarded confidentially to the **Audit department** for detailed investigation.

Any complaint that is sub judice in any court of law will not stall the internal process and necessary steps would be initiated to avoid any further loss / harm to the Bank, till the court decides in the matter.

9. Protection for Whistle Blowers

The Bank shall ensure the following:

a) Confidentiality

The identity of the whistle blower, including all personal identifiers (name, employee number, PF number, email ID, login credentials, etc.), will be kept strictly confidential.

b) Protection from Retaliation

No whistle blower shall face:

- Harassment
- Loss of promotion or career opportunities
- Salary reduction

- Disciplinary action
- Any form of discrimination or victimization

c) Legal Disclosure

If disclosure of identity becomes legally mandatory, prior consent will be obtained from the whistle blower and, and every effort will be made to safeguard the whistle blower.

10. Reporting of Disclosures, incidents, Complaints by Whistle Blower

a) Secure Submission

Hard-copy complaints must be placed in a sealed envelope to the Managing Director/CEO of the bank marked:

"Disclosure under the provisions of the Whistle blower Policy."

The whistle blower's identity must be mentioned only inside the envelope, not on the outside.

Improperly labelled envelopes may compromise confidentiality.

b) Specific and Verifiable Information

Disclosures must contain clear, factual, and verifiable details.

c) Special Cases:

In case the disclosure is against the Competent Authority –MD/CEO, then the complaint should be super scribed "Disclosure under the provisions of Whistle Blower Policy – MD/CEO– (Envelope-1) – To be opened by HOIA ONLY" and another envelope super scribed "Disclosure under the provisions of Whistle Blower Policy – MD/CEO– (Cover Envelope-2)" The second envelope should contain the Envelope-1. On receiving such envelope, the unopened envelope should be handed over to the HOIA who would take the matter to conclusion.

11. Operational Modality at the bank level

a) Submission Address

The Chief Executive Officer & Managing Director

Jalgaon Janata Sahakari Bank Ltd.

Head Office: 117/119 "Sewa", Navi Peth, Jalgaon – 425 001

Email: whistle.blower@jjsbl.bank.in

b) Processing

All disclosures will be handled confidentially by the HOIA in the presence of the MD/ CEO. No personal details will be recorded in the documentation.

An acknowledgement will be provided to the whistle blower.

c) Registration

If the MD/ CEO confirms that a disclosure falls under this Policy, it will be recorded in a **Whistle Blower Register** with a unique reference number, without identity details.

d) Restricted Correspondence

All internal communication will refer only to the reference number.

e) Email Handling

The MD/CEO will print the complaint after redacting identity details and forward it for documentation.

The original whistle blower email will not be forwarded.

f) Acknowledgement to Whistle blower

The authorized official will confirm receipt within a reasonable period.

g) Investigation

The HOIA will conduct or assign the investigation and report findings to the MD/CEO.

h) Reporting & Corrective Action

The MD/CEO and HOIA will present findings to the **Audit Committee of the Hon. Board**. Cases may also be referred to the **Risk Committee** to determine whether procedural changes are required.

12. Review of the policy

The Policy shall be reviewed periodically to align with regulatory changes.
