

Whistle Blower Policy

(Approved by the Board in meeting held on 18/07/2024 Agenda Item No. 150/6C)

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Whistle Blower Policy

1. Background

BOBCARD has always emphasized that its employees and Directors should maintain the highest standards of ethics in their professional as well as in personal affairs. BOBCARD's employees and Directors are expected to conduct banking business/ operations in the most fair and transparent manner. BOBCARD aims to set the highest standards of conduct by the employees and Directors of BOBCARD while dealing with the stakeholders. One of the Core Values is "Integrity". The desired conduct/ behavior required to conform "Integrity" are as follows:

- i. Be ethical
- ii. Be transparent
- iii. Challenge unethical or dishonest conduct.

2. Purpose & Scope

BOBCARD always encourages its employees and Directors to report suspected or actual occurrence of wrongdoing such as abuse of authority, misuse of Office, unethical conduct, violation of BOBCARD's extant guidelines, fraudulent activity etc. in BOBCARD but to report the same to the Designated Authority of BOBCARD. This is intended to ensure that a few of the employees/ Directors of BOBCARD cannot vitiate the overall atmosphere of BOBCARD and put BOBCARD's interest in jeopardy.

Any such act of wrong doing generally does not take place overnight but is carried out over a period of time. Other employees and Directors of the Branch/ Office/ BOBCARD might have had information of such acts. Had such acts been reported in time, further damage/ quantum of loss to BOBCARD could have been avoided. Employees and Directors, despite having information of such acts refrain themselves from reporting these cases due to fear of retribution.

BOBCARD has formulated 'Internal Whistle Blower Policy for its employees and Directors' to promote Corporate Governance, instill faith and empower its employees and Directors to blow the Whistle against acts of wrongdoing to the Designated

Authority without any fear of reprisal.

- ✓ The Policy set forth herein is to be read in conjunction with applicable laws & provisions of Central Vigilance Commission (CVC), Companies Act, RBI directives and other applicable provisions issued from time to time.
- ✓ To build and promote a robust Whistle blowing mechanism in BOBCARD.
- ✓ To have a platform for employees and Directors for reporting of genuine complaint/disclosure
- ✓ To empower and encourage the employees and Directors to report genuine complaint/disclosure
- ✓ To ensure adequate safeguards to Whistle Blowers against subsequent probable risk of victimization, harassment, discrimination or disadvantage.
- ✓ To provide Whistle Blowers a direct access to the Chief Risk Officer and/ or Chairperson of the Audit Committee of the ARMC.
- ✓ Audit Committee of the Board (ARMC) — The Audit Committee constituted by the Board of Directors of BOBCARD in accordance with the provisions of RBI guidelines and Companies Act, 2013.
- ✓ **Designated Authority (DA)** - The Authority identified to receive complaints/disclosures under the 'Internal Whistle Blower Policy for employees and Directors'. Presently the Chief Risk Officer (CRO) of BOBCARD shall be the Designated Authority.
- ✓ **Designated Officer (DO)** — The Officer authorized by the Designated Authority not below the rank of Assistant Vice President from the Risk Management Department for assisting in handling of the Whistle Blower complaints/ disclosures received in BOBCARD under this Policy.
- ✓ Directors- Comprises whole time Directors and part time Directors including nominee Directors.
- ✓ Disciplinary Action — Any action that can be taken on the completion of/ during the investigation, including but not limited to a warning, recovery of financial losses incurred by BOBCARD, suspension from official duties or any other disciplinary action in terms of applicable disciplinary procedure for employees considering the gravity of the matter as deemed fit.

- ✓ Disclosure — A concern raised in good faith by a Whistle Blower that discloses or demonstrates information that may evidence unethical or improper practice/ activity/ behavior with respect to BOBCARD.
- ✓ Employees — All employees of BOBCARD including Officer and Award Staff members posted at Domestic/ Overseas Territories as also those under contract service in BOBCARD.
- ✓ Subject – A person against or in relation to whom a complaint disclosure is made or evidence gathered during the course of an investigation.
- ✓ Whistle Blower — An employee or Director of BOBCARD lodging a complaint or making a disclosure under the Policy.
- ✓ The Policy shall cover complaints/ disclosures made by BOBCARD's employees and Directors only.
- ✓ Following complaints/ disclosures shall be covered under the Policy. The list is illustrative and not exhaustive.
 - Corruption: Accepting consideration in cash or kind from Customers/ middlemen for favorably considering credit proposals or any other pecuniary benefits/ facilities from BOBCARD, for which they are otherwise ineligible as per extant rules, or undeserving or there are cogent grounds or reasons for them not to get the said benefits/ facilities from BOBCARD
 - Misuse of Office: Misuse of Discretionary Lending/ Administrative powers
 - Unauthorized debits/ credits to any accounts
 - Obtaining personal gains for settling genuine claims of Customers
 - Misuse of premises for unauthorized/ illegal activities
 - Misuse of cash of BOBCARD by employees/ Custodians for personal gains
 - Criminal offenses or unlawful activities, and activities which otherwise amount to
 - serious improper conduct
 - suspected or actual fraud

- Failure to comply with existing rules and regulations resulting in financial loss or operational risk, loss of reputation and activities which are not in line with BOBCARD's policies
- Incorrect financial reporting
- Manipulation of data/ documents
- Leakage of sensitive information, breach of any Policy, abuse of power and Authority by any Official of BOBCARD or any other act with an intention of unethical personal gain or to cause damage to BOBCARD and procedures leading to reputational/ financial loss to BOBCARD.
- Any other matters raising doubt on the individual's integrity or honesty leading to corruption, misuse of Office or gross violation of Systems and procedures leading to reputational/ financial loss to BOBCARD.

Anonymous/ pseudonymous complaints/ disclosures shall not be entertained under this Policy.

Employment related concerns i.e., salary, perquisites, leave, Leave Travel Concession, promotion, transfer, performance appraisal, incentive etc. should be reported through normal channel meant for the purpose and are not covered under this Policy. Such issues shall be treated as closed ab initio without any communication/ correspondence with the complainant.

The Policy shall not cover complaints/ disclosures made by the general public under Public Interest Disclosure and Protection of Informers (PIDPI) Resolution-2004.

BOBCARD has always been encouraging its employees to report acts of wrong doings such as misuse of Office, abuse of authority, unethical conduct, violations of BOBCARD's extant guidelines, fraudulent activity etc. to the Designated Authority under Whistle Blowing mechanism. To empower and encourage the employees to report fraudulent activity, BOBCARD shall ensure as under:

3. Reporting Channel

The 'Internal Whistle Blower Policy for employees and Directors' is intended to be used for raising complaints/ disclosures by the employees and the Directors. The complaint/ disclosures shall be raised/ reported through Post/ Courier / email.

The complaint/ disclosures relating to those stated in the Scope of the Policy shall be sent

through post courier directly to the Designated Authority (at present the Chief Risk Officer) in a sealed envelope/ cover at the address mentioned below:

Designated Authority (Whistle Blower)
BOBCARD Ltd
16th Floor DLH Park
S V Road, Goregaon (W)
Mumbai – 400104
Email: whistleblower@bobcard.co.in

Complaints/ disclosures under Internal Whistle Blower Policy for employees and Directors against Board Level Executive and the Designated Authority (at present the Chief Risk Officer) shall be sent by post/ courier to the Chairperson, the Audit Committee of the Board at the following address:

The Chairperson,
Audit Committee of the Board,
BOBCARD Ltd
16th Floor DLH Park
S V Road, Goregaon (W)
Mumbai - 400104

- ✓ The envelope/ cover should be clearly superscripted as 'Complaint under Internal Whistle Blower Policy for employees and Directors'.
- ✓ The Whistle Blower shall not disclose his/ her identity on the envelope/ cover containing the complaint/ disclosure.
- ✓ The Complaint/ disclosure should be made in the format prescribed in Annexure 2. The covering letter (Part A) as per the Annexure should be on a separate sheet from the details of the Complaint/ disclosure (Part B). This will enable the Designated Authority to retain the first page (Part A of Annexure 2) containing details of the Whistle Blower (Name, Employee Code, Present Place of Posting, Address, Contact/ Mobile Number, email ID etc.) along with the envelope in his custody and hand over the subsequent pages (Part B of Annexure 2) containing the details of the Whistle Blower case to the Designated Officer.
- ✓ The complaint/ disclosure shall contain as detailed particulars as possible and shall be accompanied by supporting documents or other materials.
- ✓ The text of the complaint should be carefully drafted so as not to give any details or clue as to his/ her identity. The details of the complaint should be specific and verifiable.
- ✓ In case the envelope is not super scribed as 'Complaints under Internal Whistle Blower Policy for employees and Directors' and properly closed and sealed, it will not be possible for the Designated Authority to protect the Whistle Blower and the complaint will be dealt with as per the normal complaint handling Policy of BOBCARD.

4. Confidentiality of the information

The Chief Risk Officer of BOBCARD shall be the Designated Authority to receive complaints/ disclosures under 'Internal Whistle Blower Policy for employees and Directors'. The Designated Authority may be changed with the approval of the Audit and Risk Management Committee of the Board.

The Designated Authority may authorize an Officer, who shall be referred hereinafter as Designated Officer, not below the rank of Assistant Vice President from Risk Management Department for assisting in handling of the Whistle Blower complaints/ disclosures received in BOBCARD under this Policy. All envelopes super scribed with "Complaint under Internal Whistle Blower Policy for employees and Directors" shall be opened by the Designated Authority only.

- i. The Designated Authority shall ensure resolution of complaints within 90- days from the date of receipt of the complaint at his/ her Office.
- ii. For complaints/ disclosures received by post/ courier / email, the Designated Authority shall scrutinize the Whistle Blower Complaints/ disclosures and ascertain the identity of the Whistle Blower. If the identity of the Whistle Blower cannot be ascertained/ complaint received is anonymous/ pseudonymous, the Designated Authority may not take any action in the matter.
- iii. Once the identity of Whistle Blower is confirmed, and on being satisfied that the complaint/ disclosure has verifiable information, the Designated Authority shall ensure that the identity of the Whistle Blower is removed/ masked from the body of the complaint so as to make it appears like a dummy complaint. Complete confidentiality of the Whistle Blower shall be maintained. The dummy complaint shall be given a reference number with which the original complaint shall be traced back. In case of complaints/ disclosures received by post/ courier, Designated Authority will retain the first page (Part A of Annexure 2) containing details of the Whistle Blower (Name, Employee Code, Present Place of Posting, Address, Contact/ Mobile Number, email ID etc.) along with the envelope in his safe custody and hand over the subsequent pages containing the details of the Whistle Blower case (Part B of Annexure 2) to the Designated Officer. At no point of time will the documents kept in the safe custody be accessed without proper authority from the Designated Authority.
- iv. While calling for reports/ investigation, the Designated Authority/ Designated Officer shall not disclose the identity of the Whistle Blower and shall also request the Authority concerned to keep the identity of the Whistle Blower a secret, if by any reason, the Authority comes to know of the identity.

- v. The inquiry/ investigation shall be conducted in a fair manner and provide adequate opportunity for healing to the affected party and a written report of the findings should be prepared for submission to the Designated Authority.
- vi. If the investigation establishes either misuse of Office or substantiates allegations of corruption, fraud, potential fraud, acts of misuse of Office and gross violations of system, procedures, guidelines leading to serious threat of financial/ reputational loss to BOBCARD etc., the Designated Authority shall recommend to the Competent/ Appropriate Authority for initiating appropriate action which shall inter- alia include following:
 - a. Disciplinary Proceedings against employee concerned.
 - b. Recommend to appropriate Law Enforcement Agency for initiation of criminal proceedings in cases where facts/ circumstances warrant so.
 - c. Recommend to take corrective measures to prevent recurrence of such events in the future.
- vii. The Designated Authority at any time after the receipt of complaint/ disclosure from the Whistle Blower is of the opinion that any corrupt practice is required to be stopped during the continuation of any inquiry for the said purpose, may pass such interim instructions/ recommendations as he/ she may deem fit, to prevent the immediate stoppage of such practice.
- viii. The Disciplinary Authority to whom a recommendation is made by the Designated Authority, for disciplinary action against the employee who has been found party to the Whistle Blower complaint for either willful misuse of Office, discretion or power or substantiates allegation of corruption, shall initiate disciplinary action immediately as per applicable Disciplinary procedure and conclude the Disciplinary action logically in strict adherence of timelines prescribed by BOBCARD.

In case the Disciplinary Authority does not agree with the recommendation of the Designated Authority to initiate Disciplinary procedure against the employee, it shall record the reason for disagreement and also communicate the same to the Designated Authority.

The Disciplinary Authority will on a Quarterly basis apprise the Designated Authority of the Disciplinary action taken till its logical conclusion.

- ix. If the Designated Authority, after conducting an inquiry in any complaint, is of the opinion that there are no sufficient grounds for proceeding with further investigation/ inquiry, he/ she shall

close such complaint.

- x. The Designated Officer shall maintain a list/ record for the complaints/ disclosures received under the Whistle Blower Policy in a register or computer and shall monitor the progress periodically and put up the same to the Designated Authority every fortnight. The Designated Authority shall report all complaints/ disclosures received under 'Internal Whistle Blower Policy for employees and Directors', together with results of investigations and an update on the actions taken thereof on Quarterly basis (for Quarter ending June, September and December) to the Audit Committee of the Board and on Annual basis in March to the Audit Committee of the Board and also to the Board of Directors.
- xi. All Whistle Blower complaints/ disclosures, enclosed documents/ annexures, and the investigation reports shall be retained by BOBCARD as per the Policy on preservation and destruction of records and Document handling.
- xii. The complaint addressed to the Chairperson, the Audit Committee of the Board, shall be directly accessed by the Chairperson, the Audit Committee of the Board, who will direct the complaint to the Designated Authority or any other person of his/ her choice to investigate and report the outcome to him/ her within a stipulated timeframe in line with the Policy document. The investigation report shall be tabled at the next meeting of the Audit Committee of the Board and appropriate action/ redressal shall be recommended in consultation with the Audit Committee of the Board.
- xiii. The Whistle Blowers can escalate the complaint/ disclosure raised under 'Internal Whistle Blower Policy for employees and Directors' to the Chairperson, Audit Committee of the Board, if he/ she is not satisfied with the proceedings or findings of investigation. The Whistle Blower may reach out to the Chairperson, the Audit Committee of the Board, through a closed/ sealed cover, clearly super scribing on the top of the cover/ envelope "Complaint under Internal Whistle Blower Policy for employees and Directors" at the address mentioned in Pt No 6.
- xiv. The Chairperson will submit the data of the complaints/ disclosures received to the Designated Authority on a Quarterly basis (for Quarter ending June, September and December) and on Annual basis in March to enable him to submit the consolidated report to the Audit Committee of the Board and to the Board of Directors.
- xv. The Designated Authority and the Chairperson, Audit Committee of the Board shall ensure that no punitive action is taken by any Administrative Authority against any employee/ Director of BOBCARD on perceived reasons/ suspicion of being 'Whistle Blower'.
- xvi. In the event of the identity of the Whistle Blower being disclosed in contradiction to the Policy guidelines, the Audit and Risk Management Committee of the Board shall recommend appropriate action against the person making such disclosures.

- xvii. If any Official is aggrieved by any action on the ground that he/ she is being victimized due to the fact that he had filed a complaint or disclosure, he/ she may file an application before the Chairperson, the Audit Committee of the Board, seeking redressal in the matter.
- xviii. Attempts to conceal the evidence of the complaints/ disclosures made under 'Internal Whistle Blower Policy for employees and Directors' shall not be tolerated and appropriate Disciplinary action, as deemed fit, shall be taken by BOBCARD against those found indulging in concealment or destruction of such complaints.
- xix. Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the Designated Authority that the complaint is made in good faith.

5. Review of the Whistle Blower Mechanism

The Audit committee of the board and the board shall review and oversee the functioning of the Whistle Blower Mechanism.

A Quarterly note will be put up by the Designated Authority before the Audit Committee of the Board within one month from the end of the concerned Quarter (for Quarter ending June, September and December) and on Annual basis in March to the Audit Committee of the Board and also to the Board of Directors.

The Note will contain amongst other details:

Report on all complaints/ disclosures received under the Policy by the Designated Authority as well as the Chairman, the Audit Committee of the Board, together with results of investigations and an update on the actions taken thereof.

Details on cases where the complaints/ disclosures made did not have any specific and verifiable information and hence no action was taken.

6. Protection against Retaliation

Complete confidentiality of identity of the Whistle Blowers shall be maintained. Adequate safeguards and protection shall be provided to the Whistle Blowers against the fear of victimization/ harassment for blowing the Whistle.

Harassment or victimization of the Whistle Blowers for reporting complaint disclosure under this Policy shall not be tolerated. The harassment/ victimization of the Whistle Blower shall be treated as a serious matter and Disciplinary action shall be initiated against the employee(s) causing or allowing victimization/ harassment of the Whistle Blower.

Genuine complaint/ disclosures reported/ raised shall be acted upon in true letter and spirit.

An inquiry/ investigation conducted against any subject shall not be construed by itself as an act of accusation and shall be carried out as a neutral fact-finding process, without presumption of any guilt.

In case of non-satisfaction, if any, with the resolution of the complaint/ disclosure raised under Whistle blowing mechanism, the Whistle Blower can approach/ have access to the Chairperson of the Audit Committee of the Board.

Protection under the Scheme would not mean protection from Disciplinary action arising out of false/ malicious/ frivolous/ vexatious complaints/ disclosures made with malafide intention or found to be motivated.

7. Exclusion from Policy Protection (Whistle Blower)

In order to inhibit misuse of the Whistle Blower mechanism by the Whistle Blowers, any false/ malicious or frivolous/ vexatious complaints/ disclosures raised with malafide intention or complaints/ disclosures found to be motivated shall be viewed seriously by BOBCARD and the Designated Authority may recommend to the Competent Authority to take appropriate Disciplinary action against such Whistle Blowers.

8. Confidentiality of the information Under PIDPI

Complaints under PIDPI Resolution – 2004

This policy covers the complaints made by the employees/Directors of the bank only and doesn't cover the complaints made under Public Interest Disclosure and Protection of Informers (PIDPI) Resolution - 2004

Complaints by Whistle Blowers under the PIDPI resolution should be sent in a sealed envelope super scribing as complaint under the 'Public Interest Disclosure' to the **Secretary, Central Vigilance Commission (CVC), INA, Satarkata Bhawan, New Delhi.**

9. Roles and Responsibilities of DA & DO

A) Designated Authority (Chief Risk Officer)

- ✓ Create awareness throughout BOBCARD by communicating with the employees to build confidence on the Policy and the process.
- ✓ Encourage employees/ Directors to 'Speak Up' and raise complaints/ disclosures under the Policy.

- ✓ Strive to create an ethical culture to prevent unethical practices to the maximum extent possible.
- ✓ He/ she is the authority identified to receive complaints/ disclosures under the Policy and is responsible to ensure resolution of the complaints within 90 days from the date of receipt of complaint at his/ her office.
- ✓ Authorise an Officer who shall be referred to as Designated Officer to assist in handling of complaints/ disclosures under the Policy.
- ✓ Ascertain the identity of the Whistle Blower.
- ✓ Order an investigation of allegations made in the complaint are specific and verifiable by referring the matter to Internal Audit to get it investigated.
- ✓ Ensure that the identity of the Whistle Blower is not disclosed.
- ✓ Based on the Investigation report received from Internal Audit, recommend the same to the Disciplinary Authority to take appropriate action/ close the case.
- ✓ Ensure that no punitive action is taken by any Administrative Authority against any employee/ Director of BOBCARD on perceived reasons/ suspicion of being 'Whistle Blower'.
- ✓ Submit a Quarterly note before the Audit and Risk Management Committee of the Board within one month from the end of the concerned Quarter (for Quarter ending June, September and December) and on Annual basis in March to the Audit and Risk Management Committee of the Board and also to the Board of Directors. The Note must contain amongst other details:
 - Report on all complaints/ disclosures received under the Policy by the Designated Authority as well as the Chairman, the Audit Committee of the Board, together with results of investigations and an update on the actions taken thereof.
 - Details on cases where the complaints/ disclosures made did not have any specific and verifiable information and hence no action was taken.

B) Designated Officer

- ✓ Assist the Designated Authority in handling of the Whistle Blower complaints/ disclosures received in BOBCARD under the Policy.
- ✓ Maintain a list/ record for the complaints/ disclosures received under the Policy in a register or computer and monitor the progress periodically and put up the same to the Designated Authority every fortnight.
- ✓ Ensure that the identity of the Whistle Blower is not disclosed.
- ✓ Refer the matter to Internal Audit for getting the complaint/ disclosure investigated.

10. Review of Status Report

- ✓ The Audit Committee of the Board shall review and oversee the functioning of the Whistle Blowing Mechanism.
- ✓ In the event of the identity of the Whistle Blower being disclosed in contradiction to the Policy guidelines, the Audit Committee of the Board shall recommend appropriate action against the person making such disclosures.
- ✓ To recommend appropriate action/ redressal for investigation reports of the complaints/ disclosures and escalations received by the Chairperson of the Audit Committee of the Board and tabled in the meeting of the ACB.

BOBCARD reserves its right to amend or modify this Policy in whole or part, at any time without assigning any reason whatsoever.

The ownership of the Policy shall rest with the Chief Risk Officer.

The Policy will be effective from the date of approval by the Board and will be valid up to 30.09.2025. However, a review may be undertaken before the due date if necessary. Any direction/ guidelines issued in this regard by CVC, RBI & Companies Act and other Regulatory authorities from time to time shall form part of this Policy pending formal inclusion at the time of renewal of the Policy.

Annexure 1- Compendium of Abbreviations

ACB	Audit Committee of the ARMC
CIAD	Central Internal Audit Division
CRO	Chief Risk Officer
CVC	Central Vigilance Commission
CVO	Chief Vigilance Officer
DA	Designated Authority
DO	Designated Officer
PIDPI	Public Interest Disclosure and Protection of Informers
RBI	Reserve Bank of India

Annexure 2- Whistle Blower Complaint Form

Part A- This Table is for Office use only

Date of Filing Complaint		Dummy Reference Number		Initial of the Designated Authority	
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The Designated Authority
(Whistle Blower Complaints)
BOBCARD Ltd
16th Floor, DLH Park
S V Road Goregaon West)
Mumbai — 400104

Personal Information of the Whistle Blower

(To be filled by the Whistle Blower)

Name		
Employee Number		
Present Posting Details	Corporate Office	
	BCP Office	
	CSC	
	Other Office	
Address		
Contact Number		
Email id		

Declaration

I declare that the above information is furnished by me under 'Internal Whistle Blower Policy for employees and Directors' which is true and correct to the best of my knowledge, information and belief.

Signature and Date

Part B - This Table is for Office use only

Date of Filing Complaint		Dummy Reference Number		Initial of the Designated Authority	
--------------------------	--	------------------------	--	-------------------------------------	--

To be filled in by the Whistle Blower- (Extra pages may be used if necessary)

Statement of facts:
Statement detailing acts of omission/ commission of the person/ persons against whom the complaint/ disclosure is being made
Has the disclosure been made to anyone in the past? If yes, to whom and when.

Annexure 3 - Details to be presented to the Audit and Risk Management
Committee on Whistle Blower Complaints Quarterly Basis

- Opening Number of complaints for the Quarter
- Received during the Quarter
- No. of cases rejected technically
- No. of cases where investigation initiated
- No of cases pending
- Allegations not substantiated
- No. of cases where action taken against whistle blower for malafide intentions
- No. of cases where disciplinary action taken against employee under Whistle Blower Policy
- No. of frauds detected under Whistle Blower Policy
- Major areas of Whistle Blower complaints received
- Remedial Actions proposed