



## The Gandhinagar Urban Co-Op. Bank Ltd.

Reg. Office: C-7/8, Shree Popatlal Dani Bhavan,

Apna Bazar, Sector-21, At-Gandhinagar-382021

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Phone No. 9925109139 Branch: Head Office, Gandhinagar.

### Whistle Blower Policy

RBI Licence No. UBD GUJ.0008P Date: 22.09.1999

Registration No. S 28573 Date: 28.05.1999

Formulate / Review Date: 30.05.2025

Board Resolution No. 9





## WHISTLE BLOWER POLICY

### 1. Preamble:

The purpose of whistle blower policy of the Bank is to encourage its employees, executives, and customers (both existing and prospective) to report unethical behaviors, malpractices, wrongful conduct, and fraud, violation of the Bank's policies or statutory laws by any employee/executives of the Bank without any fear.

### 2. Scope of the Policy:

The policy shall cover all the staff members of the Branches / Head Office of the Bank.

### 3. Who can blow the Whistle?

Any employee of the Bank who has definite and verifiable information about wrongdoing/unfair practices carried out in the Bank and wishes to make a protected disclosure can blow the whistle.

### 4. Matters to be reported:

The policy is not intended to question financial or business decisions taken by the Bank that are not Reportable Matters. It should not be used as a means to reconsider any matters which have already been addressed pursuant to disciplinary or other internal procedures of the Bank. Further, this Policy is not intended to cover career related or other personal grievances.

"Reportable Matters" generally include unethical behaviors, malpractices, wrongful conduct, fraud and violation of the Bank's policies or statutory laws by any employee/director etc.

### 5. Name of Dealing Authority and Alternate

#### Authority: Dealing Authority:

- 1) Mr. Ashokkumar J. Modi – CEO/General Manager  
Phone No – 079 – 23243934, Mo. No. 9998525389

#### Alternate Authority:

- 1) Mr. Tejas P. Patel - Manager (HR)  
Phone No – 079 – 23243934 Mo No. 9427306984
- 2) Mr. Shaileshbhai B. Prajapati – Officer (HO)  
Phone No – 079 – 23243934 M No. 9662374445





Notwithstanding above, any reporting person may approach Dealing Authority/ Alternate dealing authority directly. If any members of the Dealing Authority / Alternate Dealing Authority/ Committee member have a conflict of interest in a given case, they should exclude themselves and the other committee members would deal in the matter. Any person can also use the drop box or complaint box available in the Branches for submitting complaint under whistle blower policy. Complainant does not require to disclose the name in the complaint.

#### **6. PROTECTED DISCLOSURES.**

Protected Disclosure means a complaint raised in good faith that discloses information that may have evidence of unethical conduct or improper activity. But it should be factual and not speculative in nature.

#### **7. Procedure for handling protected disclosures is as under:**

- 1) Protected Disclosure should be reported in writing by the complainant to the Dealing Authority. Any complaint received needs to be opened only by Dealing Authority in confidence. As soon as dealing authority receives complaint under whistle blower, he/she has to ensure clear understating of issue raised.
- 2) The Protected Disclosure should be informed to or submitted in a closed and secured envelope and should be superscribed as "Protected disclosure under the whistle blower policy". If the written complaint is not superscribed and not closed as mentioned above, it will not be possible to protect the identity of the complainant and the protected disclosure will be dealt with as if a normal complaint. The complainants are advised not to write the name/address of the complainant either on the envelope or to enter into any further correspondence with the dealing authority, unless called for.
- 3) In case dealing authority received "Protected Disclosure" with name and address of complainant, then dealing authority shall detach the identity of the whistle blower and the dummy complaint will be given a specific number with which the original complaint can be traced back.
- 4) The original complaint would be kept in a safe under the custody of the dealing authority and dealing authority should ensure to protect the identity of the complainant.
- 5) The dealing authority shall initiate inquiry by him/her self on the basis of complaint received.





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2. The Bank reserves the right to modify, cancel, add, or amend any provisions of this Policy.
3. It would be mandatory for all employees to inform to the management any unethical or irregular practices are happening/going on in the branch/office/bank.
4. If at the later stage come to the notice of bank that employee/s was/were aware of the unethical or irregular practice, appropriate action will be initiated against non-blower employee/s.

**8) Members of the committee:**

- Chairman
  - Managing Director / CEO
  - Head of HR Department
  - Head of Branches Department
  - Head of General Operations / Risk Department / Audit Department
- The quorum of the meeting would be minimum Three members.

**Names and Designations mentioned above are subject to change due to non-availability OR any changes.**

Above policy is broad in nature and Bank makes any change or subject to change from time to time. Or amend the policy at any time as per administrative need of the Bank and bank will have the absolute right to do so.

Date – 30.05.2025

Place – Gandhinagar

For, The Gandhinagar Urban Co-Op. Bank Ltd.



Chairman

/ MD

/ CEO