

EdCIL WHISTLE BLOWER POLICY

PREAMBLE

This policy has been introduced with the objective of providing employees, vendors and other stakeholders of the company an avenue to raise concerns on any possible incident of corruption or misuse of office that has come in to their notice. This policy also safeguards for protection of employees against victimization for whistle blowing in good faith.

TITLE AND APPLICATION

This policy will be called "EdCIL Whistle Blower Policy" for employees engaged on regular, contract/ consultancy basis and the stakeholders of the company.

DEFINITION

"Corporation" means the "EdCIL (India) Limited."

"Competent Authority" means the Chairperson and Managing Director or any other authority specifically delegated with powers in this behalf.

"Employee" means a person engaged on regular, contractual, ad- hoc, consultancy basis.

"Stakeholders" means vendors, service providers and clients.

IMPORTANT FEATURES

COVERAGE

Any person can make a complaint under Whistle Blower Policy, if the nature of the complaint falls under any of the following category:

Use of Corporation funds or property for any illegal, improper or unethical purpose.

Tampering with or destroying of any documents which could be audited by any authority except as otherwise permitted to destroy /weed out.

Fraud or deliberate error in the recording of any matter.

Misrepresentation or false statement of any matter.

Against any Public Interest

Against interest of the Corporation.

Giving or taking undue benefit of official capacity.

However, complaints mentioned below category in nature will not be entertained under this policy.

Personal Grievances:

Complaint against ongoing disciplinary proceedings.

Any other complaint which is personal in nature and not in the interest of the organization.

PURPOSE

This policy has been made to:

Maintain highest possible standards of ethical and moral values of the organization.

To protect necessary safeguards of innocent employees for being victimized for whistle blowing.

Safeguard organizational as well as employees / stakeholders interest.

COMPLAINT PROCEDURE

The complaint should be in a closed / secured envelope.

The envelope should be addressed to Chairperson & Managing Director, EdCIL or Chief Vigilance Officer (CVO), EdCIL and should be super scribed "Complaint under Whistle Blower Policy". If the envelope is not super scribed and sealed, it will not be possible to protect the complainant under the policy and the complaint will be dealt with as a normal complaint.

Any anonymous /pseudonymous complaint will not be entertained.

The text of the complaint should be carefully drafted and the details of the complaint should be specific and verifiable.

In order to protect identity of the person, no acknowledgement will be issued and whistle-blowers are advised not to enter into any further correspondence in their own interest. If any further clarification is required, the Competent Authority will get in touch with the complainant. The identity of the complainant will not be revealed unless the complainant himself has made either the details of the complaint public or disclosed his identity to others.

However, if the complaint is found to be motivated/vexatious, suitable action against complainants can also be taken.

ACTION ON COMPLAINT

A complaint received will be recorded and investigated. If at the stage of initial enquiry the complaint is found that it has no basis, or it is not a matter to be pursued under this policy, it may be dismissed at this stage and the decision will be recorded.

All the relevant papers / documents with respect to the matter raised in the complaint should be obtained by the CVO and investigation report should be submitted to the competent authority.

CVO is to ensure that no punitive action is taken by any concerned Administrative authority against any person on perceived reasons / suspicion of being "whistle blower."

Subsequent to the receipt of Central Vigilance Commission's directions to undertake any disciplinary action based on such complaints, the CVO will follow up and confirm compliance of further action by the Disciplinary Authority and keep the Commission informed.

After initial investigation if it is felt that further investigation is necessary, the same will be carried through by Vigilance Department or a person authorized (Ombudsperson) by the Competent Authority for the purpose. The investigation would be conducted in a fair manner, as a neutral fact finding process and without presumption of guilt.

An investigation report will be prepared by the Ombudsperson and submitted to the Competent / Disciplinary Authority for further appropriate action.

AMENDMENT

The Competent Authority may take action to amend or modify any of the above policy, if required.