

12.1. Whistle-blowing Policy

The aim of the whistleblowing process is to provide a channel for people to raise concerns that they may have about the Organization which they do not feel comfortable raising through the existing process. The whistleblowing process provides a safe and confidential means to raise concerns outside of the main reporting line. ActionAid Association India's Whistle-Blowing Policy aims to reinforce the Organization's commitment to transparency; zero tolerance to financial irregularities; its policies, values, attitudes and behaviours. The policy provides an alternate channel to other reporting systems to learn of any serious concern or problem so that it can be resolved timely. This policy applies to all Staff of ActionAid Association India and those of partner Organizations who are in a long- term (over one year) partnership with ActionAid Association India. The policy covers the responsibility to report wrongful acts committed by ActionAid Association India Staff and those of partner Organizations. While the policy does not specifically cover ex-Staff of the Organization, reports received from ex-Staff will also be considered for investigation..

12.7.1. Reporting Responsibility

The concerns shall be raised using a dedicated email address. This email address will be monitored by the [Executive Director or any other authorized staff] of the Organization. All such concerns shall be addressed to complaints.india@actionaid.org Where the alleged

wrongdoing relates to the conduct of the Executive Director, the case should be reported to the Chairperson of ActionAid Association India's Governing Board.

12.7.2. Concerns, disclosures and wrongful conducts covered by this Policy

Concerns/disclosures/wrongful conducts covered by the policy include:

- a. A criminal offence;
- b. Non-compliance with legal obligations;
- c. Fraud or financial irregularity;
- d. Unauthorised use of funds;
- e. Unethical conduct that breaches ActionAid Association India's policies, values or procedures;
- f. Financial and procedural malpractice including those relating to mismanagement or misappropriation of funds.

12.7.3. Confidentiality

Every effort will be made to keep the identity of an individual who raises a concern under this policy confidential, at least until any formal investigation is underway. In order not to jeopardize the investigation, concerned staff are expected to keep the fact that they have raised a concern, its nature and the identity of those possibly involved, confidential. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose concerned staff identity.

12.7.4. Handling of Reported Cases

The Executive Director or OE/HR Unit who receives a whistle-blow will acknowledge receipt of the same within seven working days. All whistle-blows will be properly investigated by a Committee set up by the management and the Committee will submit its report to the Executive Director. Upon investigation, management will take the appropriate corrective action warranted by the outcome of the investigation. The whistle-blower may be notified of the outcome of an investigation whenever it is possible to do so. On an annual basis, issues raised through whistle-blowing will be tracked and reported to the Governing Board of ActionAid Association India.

12.7.5. Protection to Whistle-blowers

Whistle-blowers are protected under law, by the Whistle Blowers Protection Act, 2014. This gives protection to Staff who raise an issue provided that:

- a. They have reasonable grounds for raising a concern
- b. The concern is raised in good faith
- c. They believe that the disclosure is in the public interest

Provided the above conditions stand the employment rights of a whistle-blower are protected. Statutory protection only extends to disclosures made relating to breaches of law, not breaches of values or morality. ActionAid Association India policy provides protection for all those making a disclosure in good faith.

Any allegation which proves to have been maliciously or knowingly false will be viewed as a serious misconduct and appropriate action may be taken. Any personal interest or conflict of interest should be made known when raising concerns.