



UBI SERVICES LIMITED
(Wholly Owned Subsidiary of Union Bank of India)

**ANTI-BRIBERY & ANTI-CORRUPTION AND WHISTLE BLOWER
POLICY**
(ABAC/WHISTLE BLOWER POLICY)

Policy Name	ABAC/Whistle Blower Policy
Issue and Effective date	
Date of last review	
Date of next review	
Periodicity of review	Annual
Owner / Contact	Compliance Department
Approver	Board of Directors
Annexures	5

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1. Introduction

1.1. Background

Trust is the essence of the relationship between an organization and the customer, and any sort of bribery and/or corruption leads to the dilution of the trust. The bribery and/or corruption also increases uncertainty in business and can have grave reputational and financial consequences. The instances of bribery and/or corruption may expose the Company to reputational as well as legal risk. The Company has zero tolerance towards all forms of bribery and/or corruption and it has resolved to initiate proactive measures to mitigate such risks including formulation of this policy. All of us should be sensitive to this aspect in our dealings with the various entities/ stakeholders that we meet/connect with and should remain committed to our core values. Company also promotes its employees to report such incidents through whistle blower mechanism.

1.2. Purpose

This (ABAC/Whistle Blower Policy) policy aims to:

- Clearly articulate the Company's commitment for prohibiting bribery and/or corruption and to be in compliance with applicable anti-bribery & anticorruption laws.
- Complement the Company's core value of Transparency and the standards of behavior expected from the employees.
- Define principles for identifying and preventing bribery and/or corruption in order to protect Company's integrity and reputation.
- Clearly communicate anti-bribery and anti-corruption principles to internal and external stakeholders.
- The Policy is to ensure highest ethical, moral and business standards in the course of functioning and to build a lasting and strong culture of Corporate Governance within the UBISL members to report to the management, concerns about unethical behavior, actual or suspected fraud or violation of the Company's Code of Conduct policy. The Policy is intended to encourage all employees of the UBISL to report suspected or actual occurrence of illegal, unethical or inappropriate actions, behavior or practices by staff members without fear of retribution. The employees can voice their concerns on irregularities, malpractices and other misdemeanors through this policy. It also provides necessary safeguard and protection to the employees who disclose the instances of unethical practices / behavior observed in the Company.
- The Policy has been modified as per relevant Notifications of RBI, Section 177 of Companies Act, 2013 & relevant rules thereon and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and existing instructions of the UBISL as well as Government of India/Central Vigilance Commission/RBI/SEBI in this matter issued from time to time, including but not limited to Circular No. 02/03/2019 issued by the Central Vigilance Commission.

1.3. Scope & Applicability

- Company's Ethics is based on values of Service, Transparency, Ethics. This policy should be read in conjunction with this relevant section of code of conduct, HR Manual and relevant regulations.
- The guidelines in this policy should be read in conjunction with the relevant section of Company's any other instructions/ guidelines issued by the Company from time to time
- This policy applies to all employees of the Company and compliance to the provisions of this policy is mandatory.
- This policy applies to all the dealings in which the Company is engaged.
- All employees of the Company posted at Regional / Branch offices are covered under this policy not only central office.
- The Policy covers malpractices and events which have taken place/ suspected to have taken place in the Company involving:
 - Corruption
 - Frauds
 - Misuse/ abuse of official position,
 - Manipulation of data / documents,
 - Any other act of an employee which affects the interest of UBISL adversely and has the potential to cause financial or reputational loss to UBISL.
- The details in the complaint should be specific and verifiable.

1.4. Governing Legislations

In setting out the principles included in this policy, the following laws have been taken into consideration:

- The Prevention of Corruption Act, 1988 and its amendments
- Indian Penal Code, 1860
- Central Vigilance Commission Act, 2003

2. Definitions

- **Employee:** Company's all Officers, Award staff, Subordinate staff, Watch & Ward staff, whether permanent, temporary, part-time, contractual or on probation,
- **Advisors:** Individuals or organizations providing consultancy and/or other services.
- **Agents:** Individuals or organizations authorized to act for or on behalf of, or to otherwise represent the Company in its business transactions.
- **Appropriate Departmental Action** – Departmental action as per the applicable service rules of the Employees/Officers.
- **Bribery & Corruption:** Accepting or obtaining or agreeing to accept or obtain from any person whether directly or indirectly for oneself or for any other person

any gratification or undue advantage as a motive or reward for discharging or forbearing to discharge one's duty or to show disfavor to any person or rendering or attempting or to render any service or disservice to any person or for improper or dishonest performance of one's duty irrespective of whether the acceptance or obtaining such gratification has actually led to showing or forbearing to show favor or disfavor or improper or dishonest performance of one's duty and whether the place of occurrence of acts constituting bribery and/or corruption is within the UBISL premises or any other place. Similarly, offering, giving or promising to give any gratification or undue advantage will also form part of bribery and corruption.

- **Charity, Charitable Contribution & Donations:** A voluntary giving of help to support those in need. It can be in monetary form (cash or equivalent) or in kind (property, assets, services).
- **Facilitation Payment:** Also referred to as 'grease payment', a payment to secure or expedite routine actions. For the purpose of this policy, facilitation payments are considered bribery & corruption and are prohibited.
- **Favoritism:** A practice of giving unfair preferential treatment to a person or group of persons or organizations.
- **Gift:** Anything of value (e.g. money, services or other benefits) given willingly to somebody without any consideration for it.
- **Gratification:** The expression 'gratification' is not restricted to pecuniary gratification or gratification estimable in money and includes but not limited to donations, gifts, money, contract of employment or service or recreation or direct or indirect hospitality.
- **Hospitality:** Relation between a host and a guest whereby a host is providing for a guest's needs without charging costs (full or partial). Providing accommodation, transportation, meals, trainings, invitations to events and conferences are examples of hospitality. Hospitality can also include organized activity that aims to provide interest, enjoyment or amusement to somebody such as attending social or sport event, theatre etc.
- **Intermediaries:** Individuals or organizations, other than employees, that perform activities of introducing or developing new businesses, retaining or building an existing business or conducting operational activities on behalf of UBISL.
- **Public Official:** An individual who is employed, appointed or elected to perform any legislative, administrative, judicial function or other public duty/ function.
- **Public Duty:** A duty in the discharge of which the State, the public or the community at large has an interest.
- **Persons Associated with Public Official** (indirect benefits to public officials): Persons who are known to be closely linked to public officials in a way that influencing this person has actually to be seen as influencing the public official himself/herself, so that the public official is influenced indirectly. Those may include close family members (e.g., spouses, children, parents or siblings) or

- close associates (e.g., personal advisors, or owned/controlled legal entities).
- **Political Contribution:** A contribution, made in cash or in kind, to support a political cause. Contributions in kind can include gifts, advertising or promotional activities endorsing individuals or any political party, the purchase of tickets to fundraising events or to undertake political campaigning.
 - **Service Providers:** Individuals or organizations that provide the Company with functional or any other support (e.g., communications, logistics, storage, processing services etc.).
 - **Suppliers & Vendors:** Individuals or organizations that supply goods and services to UBISL.
 - **Third Parties:** Joint Ventures/ consortium partners, agents, advisors, contractors, suppliers & vendors, intermediaries, service providers and others performing various tasks or functions for the Company.
 - **Whistle Blower Mechanism:** A process to report based on reasonable belief on attempted, suspected or actual bribery and/or corruption.
 - **Whistle Blower** - The Employees of the Company making the disclosure under this policy. The Whistle Blower's role is that of a reporting party. Whistle blowers are not investigators or finders of facts; neither can they determine the appropriate corrective or remedial action that may be warranted.
 - **Designated Official** – Audit Head or Appointed by MD / CEO will be the Designated Officer.
 - **Subject** - The specific branch and/or employee in respect of whom disclosure is being made.
 - **Employees** - All employees of the Company, including officer and award staff members, as also those under contract service in the Company.
 - **Disclosure** - Any communication, whether by letter/ email/ on designated portal or over telephone, relating to unethical practice or behavior or violation of service rules, made in good faith by the Whistle Blower.
 - **Reviewing Authority** – The Reviewing Authority (as Decided by MD/CEO) or MD/CEO shall be the reviewing Authority. Upon receiving the remarks and recommendation, he/she may take a view on closure of the complaint or forward the same to the concerned department for initiation of necessary action, as the case may be.

3. What is Not Acceptable

It is not acceptable from any employee of the Company or person related to an employee as friend or family member, acting on behalf of such employee, to:

- a) Indulge in acts or conduct that constitutes bribery and/or corruption as defined herein above. Acts and conduct constituting bribery and/or corruption shall not be limited to relationship with existing customers and third parties of the Company but also prospective customers, third parties and other unrelated entities having prospects of future business relationship with the Company.

- b) Offer any payment, gift, hospitality, gratification or favoritism to any person, public official or person associated with public official having or purporting to have a business relation with the Company or with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given to facilitate or expedite a routine procedure or dispensation of service.
- c) Accept or solicit any payment, advantage, gratification, gift or hospitality from a customer or third party that the employee knows or suspects of being offered with the expectation that it will obtain a business advantage for him/her.
- d) Threaten or retaliate against another employee who has refused to indulge in acts or conduct that constitutes bribery and/or corruption or who has adopted Whistle Blower mechanism of the Company to raise a concern.
- e) Engage in any activity that might lead to a breach of this policy.
- f) Where acts and conduct stated in clause 3 (a) to (d) above are indulged in by a person acting on behalf of an employee for the benefit of the employee or any other person in whom the employee is interested, the employee shall be deemed to have indulged in such acts and conduct.

The points stated above are illustrative in nature and in no way intend to limit the applicability of this policy.

4. Roles & Responsibilities of Employees

- All employees must ensure that they read, understand and comply with this policy.
- All employees are responsible for complying with this policy, any corresponding rules & procedures and all applicable anti-corruption laws while performing their duties.
- The prevention, detection and reporting of acts and conduct constituting bribery and/or corruption shall be the responsibility of all employees.
- Employees are required to avoid any activity that might lead to or suggest a breach of this policy.
- Employees should raise concerns through the Whistle Blower mechanism as soon as possible if they believe or suspect that a breach of or conflict with this policy has occurred or may occur in the future. The concerns regarding bribery and/or corruption can also be raised under the Public Interest Disclosure and Protection of Informer (PIDPI) Resolution.

5. Principles of Anti-Bribery & Anti-Corruption / Whistle Blower.

5.1. General Principles:

The principles described in this policy emanate from the Company's commitment to the highest level of integrity and transparency while conducting business. Through this policy, the Company expects its employees to adhere to the fundamental values

of integrity, transparency and accountability, consistently in all jurisdictions where business is conducted, and to foster a culture of business and professional conduct in which bribery and/or corruption are never acceptable, enumerated in the principles as under:

5.2. Zero Tolerance to Bribery & Corruption:

The Company has zero tolerance towards acts and conduct constituting bribery and/or corruption and prohibits them in any form, both direct and indirect. The Company will not tolerate its employees, or third parties being involved in acts of bribery and/or corruption themselves or someone on their behalf.

By committing to zero tolerance to bribery and/or corruption, the Company commits that every behavior in breach of the principles of this Policy shall constitute acts and conduct warranting initiation of disciplinary action against the concerned employee and corrective action against the third party.

5.3. Commitment to Combat Bribery & Corruption

The Company is committed to combat bribery and/or corruption by promoting integrity and transparency in doing business with the wide range of its stakeholders proactively.

The Company is striving to be an industry role model by implementing best antibribery & anti-corruption standards and practices, investing into training and awareness of its employees.

The Company reserves the right to refrain from any relationship with a third party, where reasonable doubts of possible bribery and/or corruption committed exist.

6. Anti-Bribery & Anti-Corruption/ Whistle Blower Standards

- **Interaction with Customers**

Where an employee is responsible for dealing with customers, it is not acceptable from him/her (or someone on his/her behalf) to accept, give, promise to give or offer any payment, gift, hospitality, gratification or advantage with the expectation or hope that a business advantage will be given or received or to reward for a business advantage already given. The UBISL prohibits all its employees from indulging in such practices.

- **Dealing with Public Officials**

Employees required to deal with public officials or persons associated with public officials have higher obligation to ensure compliance of the principles enumerated in this policy.

- **Political Contributions**

UBISL is apolitical and does not contribute financial or other support to political parties and politicians.

No employee should make any political contributions on behalf of the Company, use any of Company's resources to assist a candidate or any political party or elected official in any campaign or coerce or direct another employee to vote in a certain way.

- **Facilitation Payments**

Facilitation payments, in whatever form, irrespective of amount are prohibited by the Company.

UBISL does not tolerate its employees or third parties, in their relationship with the Company, offering, promising, soliciting, demanding, giving or accepting any kind of facilitation payments to or from any third party.

- **Charity, Sponsorship, Donations**

The Company is committed to be a responsible member of communities where it operates, to support those in need which may include sponsoring various events, initiatives and organizations.

In no case, charitable contributions, sponsorships or donations can be used as a subterfuge for bribery. All charity, sponsorship or donation activities are to be done in good faith and should not be aimed to gain any business or other advantage quid pro quo that may be considered improper.

- **Human Resources Related Activities**

Human Resources (HR) activities such as offering employment, promotions, transfers, postings, trainings and internship are often deemed to be something of value and therefore giving, offering, promising the same in order to obtain or retain an undue advantage is considered as bribery and/or corruption.

The Company does not support any unethical HR activity violating the principles of objectivity, competence, professionalism and equal opportunities, irrespective of it covered under the definition of bribery and/or corruption or not.

In order to avoid the risk of being perceived as bribery and/or corruption, all HR practices, including but not limited to, offers of employment (both full time and part time), promotions or transfers to another position, providing training or development opportunities, offers of internship (both paid and unpaid) should be only through merit-based and competitive process, wherever applicable.

- **Third Party Compliance Expectation**

In the course of its business activities, the Company engages with a large number of third parties and such relationships have potential to expose the Company to risk of being involved or perceived to be involved in bribery and/or corruption. In order to effectively mitigate such risk, the Company expects all its third parties to refrain from activities constituting bribery and/or corruption. Any such act of the third party not related with the Company, will not fall under the purview of this policy.

7. Anti-Bribery & Anti-Corruption / Whistle Blower Program

In order to adhere to the commitments and principles of the policy, Anti-Bribery & Anti-Corruption Program shall be conducted on an ongoing basis. The Anti-Bribery & Anti-Corruption/Whistle Blower Program shall consist of training of employees and tone from the top management. The essential components of Anti-Bribery & Anti-Corruption/Whistle Blower Program are as under:

Training

- One of the key tasks of Anti-Bribery & Anti-Corruption/Whistle Blower Program is to establish and maintain a culture where bribery and/or corruption is never acceptable. For this purpose, investing in employees' knowledge and awareness should be priority.
- UBISL will ensure adequate knowledge of anti-bribery & anti-corruption/Whistle Blower norms by organizing awareness program at regular intervals for sensitizing the employees on the issues related to bribery and/or corruption.

Tone from the Top

The Top Management of the Company will ensure the oversight of the desired conduct in the Company and will play an active role to enforce the standards prescribed in this policy. To ensure the right level of attention and importance of the anti-bribery & anti-corruption program/Whistle Blower, the Top Management of the Company shall periodically voice the concern and act as supervisors for the compliance of this policy. This may also be part of larger internal communication initiatives.

7 Raising Concerns/ Action required from Employees coming across any act of Bribery and/or Corruption

- In order to detect any possible act of bribery and/or corruption, any behavior in breach of anti-bribery & anti-corruption/Whistle Blower laws and regulations or breach of principles of this policy, the Company relies on its employees, customers, partners and other third parties it does business with, and encourages them to raise concerns and report suspicions related to possible bribery and/or corruption, as early as possible.
- Employee must refuse to accept or offer any payment, gift, hospitality, gratification, or favoritism from or to a customer, third party or any other employee of the UBISL and make it clear that the refusal is final. If any employee encounters any difficulty making this refusal, he/she should seek assistance from his/her Manager/Controller.
- It is the responsibility of every employee to inform/ report to his/her Manager/Controller, as soon as possible, if he/she is offered or asked to offer a bribe by/to a customer, third party or any other employee of the Company.
- If any employee wants to report any concern regarding bribery and/or corruption, he/she can use the Whistle Blower mechanism of the Company. The concerns regarding bribery and/or corruption can also be raised under the Public Interest Disclosure and Protection of Informer (PIDPI) Resolution.

8 Protection Against Retaliation / Whistle Blower

- Those who refuse to accept or offer a bribe or those who raise concerns or report another's wrongdoing, are often worried about possible repercussions. The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy.
- UBISL is committed to ensure that no one suffers any detrimental treatment as a result of refusing to take part in bribery and/or corrupt activities or because of reporting their suspicion in good faith that an actual or potential bribery and/or corruption offence has taken place or may take place in the future. If any employee believes that he/ she has suffered any such treatment, he/ she should immediately inform his/ her Controller.
- The Company will protect the confidentiality of the complainants and their names / identity will not be disclosed except as statutorily required under law.
- No adverse penal action shall be taken or recommended against an employee in retaliation to his disclosure in good faith of any unethical and improper practices or alleged wrongful conduct. It will be ensured that the Whistle Blower is not victimized for making the disclosure.
- In case of victimization in such cases, serious view will be taken including departmental action on such persons victimizing the Whistle Blower.

- Identity of the Whistle Blower will not be disclosed to the Investigating Official.
- If any person is aggrieved by any action on the ground that he/she is being victimized due to the fact that he/she had filed a complaint or disclosure, he/she may file an application before the Reviewing Authority i.e., seeking redressal in the matter, wherein the *Reviewing Authority* may give suitable directions to the concerned person or the authority.
- To protect the interest of the Whistle Blower for any adverse reporting in Annual Appraisal/Performance report, he/she may be given an option to request for a review of his/her Annual Report by the next higher Authority of the Reviewing Authority of his/her Report within three (03) months after the closure of the relevant financial year ending 31st March.

9 Breach of the Policy

Compliance with the ABAC/Whistle Blower Policy is a key requirement for all the employees along with adherence to other applicable laws, regulations and processes. Any breach of the policy will be subject to disciplinary or corrective action in terms of the applicable service rules or contract terms.

10 Handling Bribery and/or Corruption Complaints

The various sources of complaints related to bribery and/or corruption can be from any stakeholder whether related or not related to the Company like customers, general public, government agencies, employees etc. All these complaints are referred to/ dealt with by the Designated Official in UBISL. After preliminary investigation in the complaint, if allegations of bribery and/ or corruption are prima facie found correct, the detailed investigation to be arranged as per the Company's extant instructions.

The complaints where allegations of bribery and/ or corruption are prima facie found correct after preliminary investigation, will be treated as Bribery & Corruption/Whistle Blower complaints and to be reported and recorded. The Bribery & Corruption/Whistle Blower complaints in which the detailed investigation has been completed and report submitted, will be treated as disposed-off for the purpose of reporting as per this policy. The respective Controller to initiate the suitable action based upon the findings of the detailed investigation.

11 Reporting System

CRO / Designated Official at UBISL Head office will be the nodal officer for collection and consolidation of data related to bribery & corruption cases reported in the Company. The report shall be collated, analysed and a consolidated note would be put up by the Concerned Officer to the Board at half yearly intervals.

The **Fraud Control Unit under Audit (FCU)** at Head office will arrange to circulate name, telephone number, and e-mail address of the Designated Officer(s) in the Company to enable the staff members to register their complaints under ABAC/Whistle Blower Policy. Any employee (officer / award) willing to disclose information may do so in any of the following manner.

- a. In writing on prescribed format, duly addressed to the Designated Officer(s) in a sealed envelope specifically superscribed in capital letters “Disclosure under ABAC/Whistle Blower Policy”.
- b. The envelope containing the complaint to be sent to the related Designated Official **of** the Company. Efforts should be made not to disclose the identity of Whistle Blower on the top of the envelope containing the disclosure.
- c. The envelope containing the complaint to be sent to the related Designated Official of the Company. Efforts should be made not to disclose the identity of Whistle Blower on the top of the envelope containing the disclosure. The whistle blower may submit his application directly to the MD/CEO/Chairman of the Board in exceptional or appropriate cases only.
- d. Suitable proof of his identity / contact numbers / address so that additional information, if any, can be obtained. In case identity cannot be ensured, the complaints will be treated as anonymous/ pseudonymous complaints and may not attract further action.
- e. Complaints can also be sent to the designated e-mail ID created for the purpose from the official e-mail ID of the employee. The contact details / address of the Whistle Blower should however be provided. In case of absence/incorrectness of the same the complaints will be treated as anonymous/pseudonymous complaints and may not attract further action. The Email id is _____ & Number is_____.
- f. Disclosures can also be made over a dedicated Telephone/Mobile number. The Whistle Blower would, however, be required to disclose his identity and furnish sufficient information for verifying his identity by the Designated Official. Additional

information, as deemed necessary, will be sought for by the designated official attending the call.

- g. The disclosure whether by letter / email/ telephone, should provide specific and verifiable information in respect of the “Subject – Office/ Employee”.

Confidentiality mechanism of ABAC/ whistle blower:

- a. The complaints received under ABAC/Whistle Blower on the prescribed format, will be opened by the addressee/Designated officers only.
- b. Upon receipt of Complaint, the Designated Authority will enter the particulars of Complaint in the Register and allot a code number on all the pages of the complaint. The first page containing the whereabouts of Whistle Blower along with the envelope will be retained with the custody of Designated Authority. The subsequent pages containing the details of Whistle Blower case will be handed over to concerned desk official for investigation purpose. The Designated Officer will strive to ensure that identity of Whistle Blower is not disclosed. The register will be confidential and retained with the Designated Official.
- c. The particulars of the Complaint will be recorded in the prescribed Register (Annexure)

Disqualifications from protection

- a. Protection under the Policy would not mean protection from departmental action arising out of false or bogus disclosure made with malafide intention or complaints made to settle personal grievance.
- b. Whistle Blowers, who make any disclosures, which have been subsequently found to be malafide or frivolous or malicious shall be liable to be prosecuted and appropriate disciplinary action will be taken against them under Service Rules only when it is established that the Complaint has been made with intention of malice.
- c. This policy does not protect an employee from an adverse action which occurs independent of his disclosure under this policy or for alleged wrongful conduct, poor job performance, any other disciplinary action, etc. unrelated to a disclosure made pursuant to this policy.

12 Authority Structure

- From an operational perspective, the CFO / Departmental heads would be the nodal point for overall oversight and implementation of the policy in their area of jurisdiction.
- The Board of Directors will review the policy once every three years or earlier, if any modification is required.

13 Mechanism for action/reporting on such disclosures

- a. The designated official shall, on receipt of the complaint, arrange to verify the identity of the Whistle Blower.
- b. Proper record will be kept of all disclosures received (**Annexure**). The action taken against each disclosure will be also noted and put up to the Reviewing Authority within 7 days of receipt of complaint.
- c. Only on being satisfied that the disclosure has verifiable information, necessary enquiry / investigation will be done with regard to the complaint. The Designated Official will also have the authority to seek the assistance / support from other departments/ offices to conduct enquiry / investigation. The process of investigation will be completed within 45 days of receipt of the Complaint.
- d. The identity of the Whistle Blower will not be disclosed to the officials conducting the enquiry / investigation. In case additional information is required to be collected from the Whistle Blower, it will be through the Designated Official.
- e. Any 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.
- f. The inquiry/ investigation shall be conducted in a fair manner and provide adequate opportunity for hearing to the affected party and a written report of the findings should be prepared for submission.
- g. A time frame of maximum 45 days will be permitted to complete the investigation / enquiry. In case the same cannot be completed within the stipulated period, interim report should be mandatorily submitted by the Investigating Officer, giving, inter- alia, the tentative date of completion.
- h. Depending upon the nature of disclosure and its gravity, the Designated Official will take a view to take up investigation on a priority basis and fix shorter time frame for its completion.
- i. In case the disclosure made does not have any specific & verifiable information, the Designated Official will be authorized not to take any action. This would be suitably recorded and placed before the Reviewing Authority.
- j. In case the allegations made in the disclosure are substantiated, appropriate departmental action as per the provisions of service conditions in vogue will be taken against the employee concerned on whose part the lapses are observed.
- k. The action taken against the subject/employee as stated in the above paragraph will be in addition to any other action or prosecution which may be initiated against said subject/employee under any statute or law in force.
- l. Roles and Responsibilities of Designated Authority and Reviewing Authority – Annexure -1, – Annexure -2

14 Review of status report

- a. Functioning of the Policy will be reviewed by the Reviewing Authority at quarterly basis.
- b. The Designated Officer shall submit a status report on the prescribed format (Annex) to the Reviewing Authority and any other information relating to the disclosures received under the ABAC/Whistle Blower Policy on quarterly basis. The status report would include the following:
 - i. The status of the disclosure received during the present and prior period and the action taken thereon.
 - ii. The special areas which need focused attention.
 - iii. The nature of disclosures made & their Circle wise distribution.

The Reviewing Authority, shall submit consolidated status report of UBISL Board on quarterly basis with action taken report.

15 Implementation and Review of the policy

Reviewing Authority will ensure that the revised Policy is known to all employees. The Policy will be reviewed basis suggestion by board. If any change to this policy is warranted consequent upon any change in regulatory guidelines, such changes in the Policy will be approved by MD for incorporation in the Policy and placed before the Board in the ensuing meeting for information.

16 Annexures

ANNEXURE-1

Roles and Responsibilities of Designated Authority:

1. Encourage all employees of the Company to report suspected or actual occurrence of illegal, unethical or inappropriate actions, behaviours or practices by staff members without fear of retribution. To circulate name, telephone number, e-mail address of the Designated Officer(s) in the Company to enable the staff members to register their complaints under Whistle Blower Policy.
2. The Designated Authority will be the focal point to receive the complaint from Whistle Blower.
3. Ensure that the identity of Whistle Blower is not disclosed. It also provides necessary safeguard and protection to the employees who disclose the instances of unethical practices/ behavior observed in the Company.
4. Appoint any official to conduct an investigation under this Policy and submit the report to Designated Authority.
5. On the basis of investigation report, Designated Authority will forward the same to Reviewing Authority with his/her remark and recommendation. After investigation, if it is proved that the Whistle Blower's allegations are false/made with malafide intention, the Whistle Blower will not be protected under the Whistle Blower policy. In such cases, the Designated Authority may recommend to the Reviewing Authority for taking a view on the actions that may be taken against the Whistle Blower.
6. The Designated Officer shall submit a status report on the prescribed format (Annexure) to the Reviewing Authority and any other information relating to the disclosures received under the Whistle Blower Policy on quarterly basis.
7. The Designated Authority will be responsible to implement the Policy and ensure that the Policy is known to all employees.

Roles and Responsibilities of Reviewing Authority or MD & CEO / Designated by MD CEO

1. Functioning of the Policy will be reviewed by the Reviewing Authority on quarterly basis.
2. Upon receiving the investigation report along with Designated Authority's remark and recommendation, Reviewing Authority may take a view on closure of the complaint or forward the same to the concerned department for initiation of disciplinary proceedings. Upon receipt of the investigation report along with the remarks and recommendations of the Designated Authority, after scrutinizing the recommendations for action against the Whistle Blower for false allegations/ complaint with malafide intention, the Reviewing Authority will make suitable recommendations to the Designated Authority.
3. If any person (Whistle Blower) is aggrieved by any action on the ground that he/she is being victimized due to the fact that he/she had filed a complaint or disclosure, he/she may file an application before the Reviewing Authority, seeking redressal in the matter, wherein the Reviewing Authority may give suitable directions to the concerned person or the authority.
4. The Reviewing Authority shall submit consolidated status report of the UBISL to the Board on quarterly basis, with Action Taken Report.

ANNEXURE-2

Whistle Blower

She/he will submit complaint form to Designated Authority on the prescribed format along with all supporting documents of the case.

(The whistle blower may submit his/her application directly to the MD CEO / Chairman of Board in exceptional or appropriate cases only.)

Designated Authority

The designated authority shall, on receipt of the complaint, arrange to verify the identity of the Whistle Blower.

Only on being satisfied that the disclosure has verifiable information, investigator will be appointed and entrusted for investigation.

Investigator

Investigator will investigate into the matter and submit his/her report to Designated Authority within 45 days of receipt of complaint.

Reviewing Authority

Report with suitable remark & recommendation will be submitted to Reviewing Authority for closure or for initiation of disciplinary proceedings.

Designated Authority

If allegations made in disclosure are substantiated, Reviewing Authority will take decision on appropriate departmental action as per service condition. The Reviewing Authority shall submit consolidated status report of UBISL to the Board on quarterly basis.

The Board

The Board will review the status report submitted by Reviewing Authority on quarterly basis and place their observation /direction for taking corrective measures to prevent recurrence of such events in future.

If any Whistle Blower submits the application directly to the chairman of the Board, Board may forward the application to the Reviewing Authority with his direction/observation to take appropriate action and submit his Action Taken Report with remarks and recommendation.

ANNEXURE-3

A. ABAC / WHISTLE BLOWER COMPLAINT FORM:

To
The Head,
ABAC/Whistle Blower
Dept.

PERSONAL INFORMATION OF WHISTLE BLOWER

1. Name: _____
2. Employee No. _____ ID Proof * _____
3. Present Postings Details:___
 - a. Office: _____
 - b. Department/Office:_____Address: _____
4. Contact Number (R)_____ (O) _____
5. Cell No._____ email address _____
6. Person(s) against whom the complaint is made:
As per enclosed sheet.
7. Details of Complaint: As per enclosed sheet. DECLARATION

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

Signature

Date

*Copy of ID proof must be enclosed along with Complaint Form.

B. WHISTLE BLOWER COMPLAINT BRIEF FACTS OF THE CASE REPORTED UNDER

Code No		Date of filing Complaint		Initial of Designated Official	
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(For use of Designated Authority, do not write anything above it)

Statement of facts: (Please use extra pages if necessary)

Statement detailing acts of commissions/omissions of the person(s) against whom disclosure is made: (Please use extra pages if necessary.)

Was this disclosure made to anyone in the past? If yes, when and to whom.

ANNEXURE-4

A. COMPLAINT REGISTER STRICTLY CONFIDENTIAL AND SOLELY FOR THE USE OF DESIGNATED OFFICIAL

Date of filing Complaint	Case No	Name of Whistle Blower	Details of Whistle Blower	Branch/Office	Person against whom reported	Code No.	Initial

B. WHISTLE BLOWER FOLLOW-UP REGISTER

Date of filing Complaint	Code Number	Branch/Office	Person Against whom reported	Brief Details of Complaint	Date of Action taken	Nature of Action taken	Date of closure of case	Action Taken Report submitted to Review Authority	Initial

ANNEXURE-5 (For Board Presentation)

UBSIL FRAUD MONITORING DEPARTMENT/CELL,

STATUS REPORT OF COMPLAINTS RECEIVED UNDER WHISTLE BLOWER POLICY For FY

Review of Whistle Blower cases

Opening No. of complaints as on	Received during the Quarter	No. of cases rejected	No of cases where investigation was initiated	No of cases pending	Allegations not substantiated/ No of cases where action taken against whistle blower for malafide.
No. of cases where disciplinary action taken against employee under Whistle Blower Policy					
No. of ABAC cases detected under Whistle Blower Policy					
Major areas of the UBISL reported under Whistle Blower Policy					
Remedial Action to be taken					

Department

Signature of Reviewing/ Designated Authority Place:

Date: