

WHISTLE BLOWER POLICY



Eleutheros Christian Society

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This section describes the mechanism that ensures that all employees have free access to appropriate management levels for bringing up any actual or potential issue/s which has/have violated or potentially violate ECS policies, code of conduct or the local laws.

It lists down broadly the identifiable and non-negotiable set of actions and behaviors applicable to all employees of the Organization. It provides directions and limits, it explains how to report violations/potential violations of the organization's values, code of conduct and the process of redressal.

Who is a whistle blower? Any employee who discloses or demonstrates an evidence of unethical activity or any conduct that may constitute breach of the organization's code of conduct or its values.

Every employee is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely on hearsay and rumour. No action will be taken against the whistle blower if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

However, if a complaint, after an investigation proves to be perky, malicious or made with an ulterior intent, the compliance committee will take appropriate disciplinary action against the concerned whistle blower.

The compliance committee shall comprise of the Secretary, the Managing Director and the Associate Director

Below are few examples where non-compliance may be reported:

- Harassment or Discrimination & Work place Violence.
- Improper conduct while representing the organization in any place or forums.
- Protection of Confidential Information and intellectual property.
- Privacy breach.
- Fraud or questionable accounting/financial reporting or any other reports.
- Corruption and improper transactions.
- Conflicts of Interest.
- Theft, misuse of organization's assets.
- Any Illegal or unethical Practices.

Employees of ECS are free to choose the reporting channel for their complaints and can report to the immediate Supervisor or the Coordinator/Project Manager or directly to the Associate Director or the Secretary.

The Associate Director in consultation with the Secretary will take effective steps to respond to any concern which has been reported. The person raising such concern will also be informed of the outcome of the investigation.

Based on the report of the Investigation or findings, the Associate Director will recommend disciplinary action in consultation with the Secretary and the Managing Director. All disciplinary action recommended will be in accordance with applicable laws.

The identity of the complainant will be kept confidential if asked to do so and will be disclosed only if it becomes necessary for investigation purposes or in certain circumstances where it is legally required to be so disclosed.

