महाराष्ट्र ग्रामीण बँक
MAHARASHTRA GRAMIN BANK
शासकीय मालकीची शेड्यूल्ड बँक Scheduled Bank Owned by Government

VIGILANCE & DM DEPARTMENT

HEAD OFFICE:
Plot No.42, Growth Centre, Waluj Mahanagar Project IV,
Paithan Road, CIDCO, Chh. Sambhajinagar, 431010.

WHISTLE BLOWER POLICY FOR EMPLOYESS 2026-27

Version 2.0

153

Circulated vide: MGB/ HO/ Vigi. & DM / Cir No.06/2026-27 (153)

Dated: 01/04/2026

(For Internal Circulation Only)

MAHARASHTRA GRAMIN BANK
Head Office
Chhatrapati
Sambhajinagar

HOD, Vigilance & DM Department. **General Manager**

POLICY 2026-27

Policy Name	**WHISTLE BLOWER POLICY FOR EMPLOYEES 2026-27**
Drafted By (Department)	**VIGILANCE & DM DEPARTMENT**
Date of Approval	**20th March, 2026**
Documents Classification	**INTERNAL**
Version No.	**2.0**
Applicability	**Applicable from 1st April 2026**

Version History

Version No.	Financial Year	Policy Name	Issued By
1.0	2025-26	Whistle Blower Policy for Employees 2025-26	Vigilance & DM Department
2.0	2026-27	Whistle Blower Policy for Employees 2026-27	Vigilance & DM Department

Version Approval

Version No.	Date of Approval	Changes/Comments	Approved By
1.0	07.05.2025	Whistle Blower	Board.
2.0	20.03.2026	No Change	Board

Regulatory Guidelines Referred

Sr. No.	Regulatory Guidelines / Directives (Please mention Reference number & Date of Issue)	Issued By

Compliance Vetting date	**02.02.2026**	**Legal Vetting Date**	**06.03.2026**

Changes: NIL

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MAHARASHTRA GRAMIN BANK
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Reviewed by
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Approved by Board
(Board meeting dated 20.03.2026)

WHISTLE BLOWER POLICY FOR EMPLOYEES 2026-27

PREAMBLE -

The Bank is committed to adhere to the highest standard of ethical, moral and legal conduct of business operations. To maintain these standards, Bank encourages its employees who have concerns about suspected misconduct, to come forward and express these concerns without fear of punishment or unfair treatment.

The Whistle-blower Policy is framed for the employees of the bank to report to the appropriate authority, any violation of systems & procedures, malpractices, abuse of powers, non-compliance of laid down system, wrong doing, misconduct, irregularities and commission of fraud etc. which comes to their knowledge. The Whistle-blower Policy of the Bank provides broad guidelines for prompt reporting of such malpractices so as to save the bank from any adverse effect on business and reputation of the Bank. To disseminate among the employees assuring confidentiality and protection to the whistle blower against any personal vindictive action such as humiliation, harassment or any other form of unfair treatment.

OBJECTIVE -

The objective of this policy is to identify any violation of rules with the help of the employees and to take timely corrective action so as to protect the interest of the Bank at the earliest stage.

COVERAGE -

The illustrative list of incidences that can be reported is as under -

1. Breach of Bank's policy prescriptions.
2. Acts of recklessness in decision making.
3. Demanding and /or accepting gratification.
4. Non permissible accounting matters and auditing matters.
5. Gross negligence.
6. Act of financial malpractices.
7. Abuse of powers.
8. Any other act which affects the interest of the Bank adversely and has the potential to cause financial or reputational loss to the Bank / activity which is harmful to the Bank's image.
9. Acts of misappropriation, Cheating or other criminal offences.
10. Indications of living beyond the means.
11. Corrupt practices.
12. Harassment.
13. Blatant violation of laid down procedures.
14. Frauds, bribery or corruption.
15. Manipulation of data/documents.
16. Any other unethical conduct.

The above list is only indicative and not exhaustive.

EXCLUSION: -

Decisions taken by any committee established by the Bank and Policy decisions of the Bank shall be outside the purview of this policy.

PROCESS –

1) **Reporting Mechanism –**
Any employee, coming across such adverse events shall promptly/immediately report the same in following manner:

a. The written complaint should be sent in a closed/secured envelope addressed to:

The General Manager (Vigilance & DM),
Authorized Officer under Whistle Blower Policy,
Maharashtra Gramin Bank,
H.O.: Plot No. 42, Gut No 33 (Part), Village Golwadi Growth Centre,
in Waluj Mahanagar-IV of CIDCO, Chhatrapati Sambhaji Nagar – 431010.

The envelop should be super scribed as 'Complaint under Whistle Blower Policy'. If the envelop is not super scribed and not closed securely, it will not be possible for the Authorized Officer to protect the identity of the complainant and the complaint will be dealt as per normal complaint handling policy**.**

b. The identity should not be disclosed on the envelope containing the written complaint**.** However, the whistle blower is required to disclose his/her identity and furnish sufficient information for verifying his/her identity by Authorized official. Therefore, the complainant should mention his/her name, address and contact details at the beginning/end of the complaint OR in a separate letter attached to the complaint for the purpose**.** The details of the complaint should be specific and verifiable. If the complainant does not mention his/her name, address and contact details OR does not mention it correctly and his/her identity is not established then the complaint will be treated as anonymous/pseudonymous complaint and will not be treated as Complaint under Whistle Blower Policy and will not be accepted OR acted upon.

c. Additional information as deemed necessary, will be sought by the Authorized official.

d. The text of the complaint should be carefully drafted so that no clue OR details of his/her identity are revealed.

e. In case of the complaints against Executives/Officials deputed to our bank from the Sponsor Bank; the 'Whistle Blower Policy'of the Sponsor Bank will be applicable and therefore any complaint received against these officials will be forwarded to the sponsor bank.

2) **Mechanism for Action/ Reporting on such disclosures -**

i. The General Manager (Vigilance & DM), on receipt of the complaint shall verify the identity of the whistle Blower. On verification the identity of whistle blower being established, Authorized Officer via Vigilance Department (convener) shall inform Fraud Monitoring Group (FMG) to scrutinize the complaint and initiate investigation through Inspection Dept. Progress of the investigation will be monitored by FMG.

The composition of FMG committee is as under:

a) General Manager (Vigilance & DM)
b) General Manger (IT),
c) HOD (Inspection and Audit Dept.),
d) HOD (IRM Dept.),
e) HOD (HRD Dept.),
f) HOD (Credit Monitoring Dept.)
g) HOD (Vigilance Dept.) (Convener).

The Committee meetings would have a quorum of minimum of 3 members where the presence of General Manager (Vigilance & DM) OR General Manager (IT) is mandatory. The Committee would be headed by General Manager (Vigilance & DM) present in the meeting and in absence of General Manager (Vigilance & DM) due to leave, tour etc., General Manager (IT) will act as chairman of the committee.

ii. The meeting of the committee shall be convened within 30 days of receipt of the complaint under whistle blower policy; subject to proper evidence and credible information about the involvement.
iii. Proper record shall be kept of all disclosures received. The action against each disclosure will also be noted.
iv. Any inquiry/investigation conducted against any subject shall not be construed by itself as an act of accusation and shall be carried out as neutral fact finding process, without presumption of any guilt.
v. The inquiry/investigation shall be conducted in a fair manner and it should provide adequate opportunity for hearing to the affected party and a written report of the findings should be prepared for its submission.
vi. A time frame of maximum 30 days will be permitted to complete the investigation/ enquiry. In case the same cannot be completed within stipulated period, interim report should be submitted by the Investigating officer giving inter alia, the tentative date of completion.
vii. In case the complaint made does not have any specific & verifiable information, the General Manager (Vigilance & DM), with due consultation with FMG committee will be authorized not to take any action and this would be suitably recorded.
viii. In case the allegations made in the complaint are substantiated, appropriate departmental action will be taken against the employee concerned on whose part lapses are observed.
ix. The action taken against the subject/employee as stated in the above paragraph will be in addition to any other action or prosecution under any statute or law in force which may be initiated against said subject/employee.

3) Protection of Interest of Complainant –

a) The Bank will protect the confidentiality of the Complaints and their names /identity will not be disclosed except as statutorily required under law.
b) In order to protect the identity of the person, no acknowledgement shall be issued and the whistle-blowers are advised not to enter into any further correspondence, in their own interest. Subject to the facts of the case being verifiable; it is to be ensured that necessary action is taken.
c) The identity of the whistle Blower will not be disclosed to the investigating official.
d) 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, he/she may file an application before the committee seeking redress in the matter, whereupon suitable directions may be given to the concerned Department.
e) In the event of disclosure of the identity of the informant, FMG may advise the appropriate authority to initiate against the person making such disclosure the action as per extant regulations.

4) Disqualification from protection –

Any abuse of the scheme by way of a complaint made with malafide intention or which is false or bogus will disqualify the complainant from the protection under the scheme and in such cases he/she will be liable for suitable disciplinary action.

In pursuant to a complaint, if the investigation reveals the involvement of the Whistle Blower himself/herself in the act and/or irregularity, under any circumstances no protection including that of non- disclosure under this policy shall be available to the Whistle Blower and he/she shall be liable to be prosecuted as per norms, for his/her involvement in the act and/or irregularity.

The 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, and any other disciplinary action etc., unrelated to a disclosure made pursuant to this policy.

5) Roles and Responsibilities –

The General Manager (Vigilance & DM) shall inter-alia take the following actions with respect to the complaints received.

a. All the relevant papers/documents with respect to the matter raised in the complaint should be obtained by the General Manager (Vigilance & DM).
b. The Fraud Monitoring group has to ensure that no punitive action is taken by any concerned administrative authority against any person on perceived reasons/suspicion of being 'whistle blower'.
c. Any other step the FMG may deem fit in the facts & circumstances of case with a view to ensure that–
   (i) The matter is taken to the logical end
   (ii) The Whistleblower is protected in any event.

d. Concerned Disciplinary Authority has to undertake suitable disciplinary action based on such complaints.
e. FMG may refer the matter for further investigation to CBI/Police, if warranted by the facts and circumstances of the case.
f. In relation to whistle blower complaints and Senior Management escalations, on quarterly basis, Vigilance Dept.(convener) will provide details of complaints under investigation during the period to the Operational Risk Management Committee for further appraisal to Audit Committee of the Board (ACB) for necessary review of progress of action taken on complaint.

False or motivated Complaints –

In case the complaint is found to be motivated or vexatious, the Fraud Monitoring Group shall be at liberty to direct the appropriate authority to take disciplinary action against the complainant.

Responsibilities of Whistle Blower –

The intent of this policy is to bring genuine and serious issues to the fore and it is not intended for petty disclosure. Employees are expected to exercise their rights under this policy in judicious manner by adhering to the following guidelines:

(i) Avoid anonymity when raising a concern as the identity shall be protected by the concerned official/s in the Bank
(ii) Follow the procedures prescribed in the policy for making a disclosure
(iii) Bring to early attention of the Bank any improper practice or wrong doings, he/she becomes aware of. As the delay in reporting may lead to loss of evidence and also financial loss to the organization.
(iv) Cooperate with the investigating authorities and maintain full secrecy.

Review of the Policy: The policy shall be reviewed every year. It shall however remain in force till further review.

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WORKFLOW CHART

WHISTLE BLOWER

She/He will submit complaint to authorized official at Head Office {General Manager (Vigilance & DM)} in Offline mode, along with all supporting documents.

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Authorised Official

The Authorized Official i.e. General Manager (Vigilance & DM), on receipt of the complaint shall verify the identity of the whistle Blower. On verification of identity of whistle blower, Authorized Officer shall inform to FMG committee via Vigilance Department (convener).

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Fraud Monitoring Group

The FMG committee comprising of General Manager (Vigilance & DM) as specified in Point 2 (i) will initiate the investigation through Inspection Dept. The investigation report will be submitted to the appropriate Disciplinary Authority to initiate disciplinary proceedings or closure of the complaint if not genuine/verifiable.

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Operational Risk Management committee

On quarterly basis, Vigilance Dept.(convener) will provide details of complaints under investigation during the period to the Operational Risk Management Committee for further appraisal to Audit Committee of the Board (ACB) for necessary review of progress of action taken on complaint.

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