



यूको बैंक UCO BANK
RISK MANAGEMENT DEPARTMENT
प्रधान कार्यालय Head Office
कोलकाता KOLKATA

Whistle Blower Policy

Risk Management Department



Document Control Information

Document Reference

Document Name	Whistle Blower Policy
Owned By	Risk Management Department
Reviewed By	Operational Risk Management Committee
Approved By	Audit Committee of Board

Document Revision and Version Control

SI No.	Version	Reviewed by Operational Risk Management Committee	Approved by Audit Committee of Board
1	1.0	10.05.2024	30.05.2024
2	2.0	13.03.2025	28.03.2025



Table of Contents

Srl No	Chapter	Page
1	Introduction	1
2	Objective	1
3	Governing Laws	2
4	Scope of the Policy	2
5	Eligibility to blow the Whistle	3
6	Complaints not to be responded	3
7	Nodal Officer	3
8	Procedure for lodging the complaint under the Policy	4
9	Safeguard to protect the identity of the Complainant	5
10	Process flow for dealing with Complaint received under Whistle Blower Policy	5
11	Conflict of Interest	7
12	Closure	7
13	Reporting	7
14	Validity end Review of the Policy	7
Annexure-I : Format of Complaint		9



1. Introduction

In order to safeguard the Bank against internal /external threats like frauds, bribery, corruption, abuse of authority, non-compliance with laid-down systems and procedures, transgression of delegated authority etc. involving financial and reputational implication, constant vigilance at all levels is necessary through a process called 'participative vigilance' where each and every employee / director has certain role-play and is duty bound to execute the same. The staff members/directors are expected not to be silent spectators to any wrongdoing in the branch/ office but to report the same to the higher authority/ authorities concerned. The same is intended to ensure that a few unscrupulous staff members are not vitiating the overall atmosphere / work culture and putting the Bank's interest in jeopardy.

It is also observed that these acts do not take place overnight but are being carried out/ perpetrated over a period of time. It is unlikely that such acts could escape the knowledge of other colleagues working in the Branch / Office. Had such instances of frauds, bribery, corruption, abuse of authority, non-compliance with laid down systems and procedures etc. been brought to the notice of the higher authority/ authorities concerned in time, further damage could have been avoided.

Staff members/directors, many a time, are hesitant to come forward and report to higher authorities about wrongdoings, mishaps around them fearing disclose of identity and probable retribution/ victimization from the official/s concerned. In order to instil confidence in the staff members/directors as well as to prevent the mishap at the initial stage itself, a need was felt for introduction of 'Whistle Blower Policy' which will lead to ensure more effective Corporate Governance.

2. Objective

This Policy aims to establish a mechanism to receive complaint relating to any allegation of corruption or wilful misuse of power or wilful misuse of discretion against any employee of the Bank and to inquire or cause an inquiry into such disclosure and to provide adequate safeguards against victimization of the person making such Complaint and for matters connected therewith and incidental thereto.



3. Governing Laws

Whistle Blower Mechanism is governed by the provisions of Section 177 of the Companies Act, 2013; guidelines dated 17.04.2014 issued by Securities and Exchange Board of India (SEBI) regarding Clause 49 of Listing Agreement between the listed entity and the Securities and Exchange Board of India (SEBI) regarding clause 49 of Listing Agreement between the listed entity and the Stock Exchange; and guidelines/directions dated 01.07.2016 issued by Reserve Bank of India under section 35 (A) of Banking Regulation Act read with the Whistle Blower Protection Act, 2014 (Act 17 of 2014) and the resolution on Public Interest Disclosure & Protection of Informers (PIDPI) and Guidelines issued by Central Vigilance Commission etc., as the case may be, which specifically provide for a "Whistle Blower Mechanism" for the employees of the organizations, to report allegations of corruption or misuse of office by the authorities of that organization.

4. SCOPE OF THE POLICY

The Policy shall cover the Directors on Board of the Bank and all the staff of the Bank in Branches / Offices domestically as well as abroad.

Though an exhaustive list of activities that constitute such misconduct/ malpractice / violations cannot be enumerated, the following acts shall come under the purview of this Policy:

- I. Breach of the Bank's Code of Conduct
- II. Questionable accounting or auditing matters
- III. Any matters in the Bank involving abuse of authority
- IV. Fraud, bribery or corruption
- V. Employee misconduct
- VI. Illegality
- VII. Wastage/ misappropriation of the Bank's funds / assets
- VIII. Victimization of employees and Directors
- IX. Harassment of employees
- X. Breach of IT security and data privacy
- XI. Any other unethical conduct
- XII. Breach of any law, statute or regulation by the Bank
- XIII. Issues related to accounting policies and procedures adopted for any area or item
- XIV. Acts resulting in financial loss or loss of reputation
- XV. Misuse of office, suspected/actual fraud and criminal offences

No action is required to be taken on anonymous/ pseudonymous complaints irrespective of the nature of allegations and such complaints should be filed.



Sexual harassment complaints and HR process related grievances will be referred to Human Resource Department for investigation, resolution and closure.

5. Eligibility to blow the Whistle

Any employee (working in India or abroad) or Director of the Bank who has definite and verifiable information about any wrongdoing/unfair practices carried out in the Bank and wishes to make a protected disclosure can blow the whistle.

The Whistle Blower's/ Complainant's role is that of a reporting party with reliable information. He/she is not required or expected to act as investigator or fact finder, nor would he/she determine that appropriate corrective or remedial action that may be warranted in a given case.

Whistle blower/Complainant should refrain from sending reminder or seeking further development/ action taken regarding disclosure made by him so as to protect his/her identity. The Competent Authority may, if it deems fit, call for further information or particulars from the person making the disclosure.

6. Complaints not to be responded

Anonymous / pseudonyms complaints will not be covered under the scheme and such complaints will not be entertained.

An employee who knowingly makes false allegations of unethical & improper practices or alleged wrongful conduct shall be subject to disciplinary action and will not be protected under the policy

No action shall be taken on the basis of disclosure made by the Competent Authority (Central Vigilance Commission) in respect of Public Interest Disclosure & Protection of Informer (PIDPI) Complaints.

7. Nodal Officer

The Chairman of Audit Committee of Board (ACB) will be designated officer to receive the Complaints and will be referred as Nodal Officer in the policy.

In order to ease operational difficulty, an officer not below the rank of Deputy General Manager of Risk Management Department as an Authorized Officer for receiving the complaint / Access through the Bank's portal. Further, if any complaint is lodged at portal, an auto generated mail will be sent to email id of Nodal Officer.



Address of Nodal Officer

Nodal Officer-Whistle Blower

UCO Bank

Board Secretariat

Head Office

7th Floor

10 B.T.M. Sarani

Kolkata – 700001

The Board Secretariat on receipt of any closed/ sealed envelope superscribed as "Complaint under Whistle Blower Policy" should send the sealed envelope as received to Authorized Officer who in turn will update to Nodal Officer.

8. Procedure for lodging the complaint under the Policy -

The complaint can be sent through either of following:

- I. Bank's Whistle Blower portal available on the Bank's HRMS Portal
- II. Closed / sealed envelope.

The format for lodgement of complaint under Whistle Blower is given as **Annexure-I**

I. Complaint through HRMS Portal:

If Complainant wishes to lodge complaint through Bank's HRMS portal then they can access the link through the Bank's internal portal (<https://hrms.ucoonline.in>). The link is accessible to all employees of the Bank to share information about any unlawful activities going on within organization / frauds / steps required to implement preventive vigilance.

II. Complaint through other mode:

Complainant can make complaint under the policy through closed and sealed envelope and send it through registered post at Nodal Officer address mentioned above. The envelope should be super scribed as "Complaint under Whistle Blower Policy" and to be sent through registered post on the address mentioned above. If the envelope is not superscribed and closed, it will not be possible to protect the complainant under the policy and the complaint will be dealt with as per the normal complaint policy of the bank.



The complainant should ensure that the issue raised involves dishonest intention / moral angle. He / She should study all the facts and understand their significance. The text of the complaint should be carefully drafted so as not to give any details or clue as to his / her identity. The details of complaint should be specific and verifiable.

Disclosure should be factual and not speculative or in the nature of conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigation procedure.

The Whistle Blower must disclose his / her identity like name, designation, department and place of posting etc. while forwarding the complaints.

9. Safeguard to protect the identity of the Complainant

In order to protect the identity of the complainant, Nodal Officer/Authorized Officer will not issue any acknowledgement of receipt of the complaint and the complainants / Whistle Blowers are advised not to enter into any further correspondence with Nodal Officer or Authorized Officer In their own interest.

The Bank assures that, subject to the facts of the case being verifiable, it will take necessary action. If any further clarification is required, Nodal Officer/Authorized Officer will get in touch with the Complainant.

The Bank assures all the relevant provisions of the Whistle Blowers Protection Act, 2014 will be adhered to.

10. Process flow for dealing with Complaint received under Whistle Blower Policy:

Whenever a complaint is made in whistle Blower Portal, an auto generated email will be sent to the Chairman of ACB. Simultaneously the complaint will be viewed in HRMS portal available to Authorized Officer. The same will again be forwarded to Nodal Officer by Authorized Officer on his registered mail Id. If complaint is received by Nodal Officer directly through sealed envelope, he will immediately forward the complaint to Authorized Officer for further action. For complaint received through closed/sealed envelope, Board Secretariat will hand over the envelope to Authorized Officer who in turn will update to Nodal Officer. **If the identity of the Whistle Blower is disclosed subsequently than the Audit Committee of the Board will initiate enquiry into the matter and will recommend appropriate action against the person making such disclosures to his/her Disciplinary Authority including Authorized Officer as well as member of Whistle Blower Committee.**



On receipt of complaint by the Authorized Officer, a discreet enquiry will be conducted by him and if it is found that the complaint is not tenable under the Whistle Blower Policy, the same will be communicated to the Nodal Officer in writing, with recommendations for closure of the case.

If on discreet enquiry it is found that the complaint is tenable then the complaint will be placed before the Whistle Blower Committee without disclosing the name of the complainant to decide whether to conduct further investigation through Audit & Inspection Department Head Office/Zonal Office as the case may be or not.

If the committee decides to conduct the investigation in the matter, the Authorized Officer should inform the same to Audit & Inspection Department for conducting detail investigation in the matter. On receiving the report the same will be placed before the Whistle Blower Committee for their decision. **The decision of the whistle blower Committee along with the investigation report will be sent to Nodal Officer for his comment. Nodal Officer decision shall be final.**

The above process to be completed within maximum time period of 90 days from the date of receipt of Complaint.

If in the investigation report any fraudulent element is found the same should be placed by RMD before Fraud Monitoring Group/CoE FRRM-I for the latter's decision.

The Whistle Blower Committee will consist of the following members:

General Manager, Human Resource Management Department
General Manager, Risk Management Department
General Manager, Audit & Inspection Department
General Manager, Compliance

The Quorum of the Committee will be three (3).

The convener of the meeting will be Authorized Officer.

The Committee will meet whenever a complaint is received in Whistle Blower Module.



The decision of Nodal Officer will be informed by the Authorized Officer to the Complainant through HRMS portal if complaint was received at HRMS portal or physically, if complaint was received physically.

11. Conflict of Interest

Where a Complaint under Whistle Blower Policy concerns Authorized Officer or any member of the Whistle Blower Committee, Nodal Officer can change the Authorized Officer / Whistle Blower Committee member on case to case basis.

12. Closure

The Complaint will be closed by the Authorized Officer only on receiving consent in this regard from Nodal officer.

13. Reporting

Risk Management Department will place a quarterly note before Audit Committee of the Board on the status of complaint received during the Quarter along with status of complaint which was reported as open during the previous quarter.

The note shall contain the following information, at minimum:

- I. Details of Complaint (without disclosure of name of the Complainant / Whistle Blower
- II. Findings of the Investigation (if any)
- III. Decision of the Whistle blower Committee.
- IV. Final decision of Nodal Officer

14. Validity and Review of the Policy

The policy guidelines will be applicable from the date of approval and will remain in-force till further review. The policy will be reviewed once in two years.

The System and Procedure Committee is the competent authority to approve any Operational guidelines / SOP pertaining to this policy.

Travel Route of the Policy: The policy will be placed before ORMC and then Audit Committee of Board for final approval.

Further Operational Risk Management Committee (ORMC) shall be authorised to incorporate any changes necessitated in the policy for the interim period up to the



next review, due to regulatory pronouncements made during the validity period of the policy.

Whistle Blower Policy of the Bank will be made available in the Bank's Website.

Format of Complaint:

Particular	Complaint Information
Complaint against Single Employee or Group of Employees	Single/Multiple
Employee No. (EMP. No) of the person against whom complaint raised	
Subject of issue	
Type of irregularity	Financial/Non Financial
Detail of Irregularity	
Document Attached (if any) supporting the Complaint.	

