

## WHISTLE BLOWER POLICY

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### **Preface**

- AFPRO believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behavior.
- AFPRO is committed to developing a culture where it is safe for all employee to raise concerns about any wrong or unacceptable practice and any event of misconduct.
- The purpose of this policy is to provide a framework to promote responsible and secure whistle blowing. It protects employees who wish to raise a concern regarding irregularities within the organization.

### **Definition**

“Whistle Blower” is someone who makes a protected disclosure under this policy.

“Whistle Officer” or “Committee” means an Officer or Committee who is nominated / appointed to conduct detailed investigation.

### **Policy**

This policy is applicable to all staff / consultants who are engaged under various projects, contractors, partner organization, beneficiaries dealing with AFPRO whether directly or indirectly. The policy covers the responsibility to report wrongful acts committed by staff / consultants of AFPRO.

## **Guiding Principles**

To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, AFPRO will –

- Ensure complete confidentiality.
- No attempt to conceal evidence of the Protected Disclosure
- Ensure that the Whistle Blower and / or the person processing the Protected Disclosure is not victimized for doing so.
- Take disciplinary action, if any one destroys or conceals evidence of the protected Disclosure made / to be made.
- Provide an opportunity of being heard to the person/s involved especially to the subject.

## **Reporting Responsibility**

- It is an obligation for all AFPRO staff to report wrongful act or suspected wrongful acts in accordance with this Whistle Blowing policy.
- Any employee / consultants or partner organization who observes any improper practice or wrongful conduct, should report such observations to the Executive Director or to the Committee.
- Employees can make Protected Disclosure to the designated Compliance Officer i.e., Executive Director, as soon as possible but not later than 30 consecutive days after becoming aware of the same. The protected disclosure can be sent to the email address at [whistleblower@afpro.org](mailto:whistleblower@afpro.org) which is password protected and can be accessed only by the concerned person. The Whistle Blower must put his/her name to allegations. Concerns expressed anonymously will not be investigated. AFPRO has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their immediate supervisor/Reporting Officer. If any staff / consultant is not comfortable speaking with his/her supervisor or is not satisfied with his / her supervisor's response, he / she is encouraged to speak / write to the Regional Manager and then designated person ie; Executive Director. The Supervisors and Managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Compliance Officer (Executive Director), who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Director.
- The Executive Director is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved.

- The Executive Director will appoint a compliance officer/committee for the investigation considering the nature of complaint and location.
- The team will report the Executive Director about the complaint and their resolution.
- Based on the report, Executive Director will take an action.
- Where the alleged wrongdoing relates to the conduct of the Executive Director, the case should be reported to the President of AFPRO Governing Body.

### **False Allegations**

- While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.
- Protection under this Policy would not mean protection from disciplinary action arising out of false allegations made by a Whistle Blower knowing it to be a false or bogus or with a mala fide intention. The same will be viewed as a serious disciplinary offence and action will be taken as outlined in HR Manual.

### **Confidentiality**

The Whistle Blower, the Subject, Whistle Officer / Committee involved in the process shall:

1. maintain complete confidentiality of the matter / concern.
2. not to discuss the matter in any informal / social gatherings / meetings, etc.
3. discuss only with the persons or to the extent required for the purpose of completing the process and investigations.
4. not to keep the papers / files anywhere at any time unattended.
5. Keep the electronic mails / files under password.

If the Committee is found not complying with the above, shall be held liable for disciplinary action as is deemed fit.