

SGBS Unnati Foundation

Whistleblower Protection Policy

Policy

SGBS Unnati Foundation (SUF) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the SUF, all must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations at all times.

A. Reporting Responsibility

This Whistleblower Protection Policy is intended to encourage and enable employees and others to raise serious concerns internally so that SUF can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, donors, auditors and volunteers to report concerns about violations of SUF's code of ethics or suspected violations of law or regulations that govern SUF's operations.

B. No Retaliation

It is contrary to the values of SUF for anyone to retaliate against any board member, officer, employee, donor, auditor and volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of SUF. Any employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment.

C. Reporting Procedure

SUF has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with any of the Board Members. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or to any Board Member.

Donors, Auditors & Volunteers may share their questions, concerns, suggestions or complaints with any of the Board Members.

D. Compliance Officer

Mr. A.S. Narayanan, Director is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. He will advise the the Board of Directors of all complaints and their resolution.

E. Accounting and Auditing Matters

The Compliance Officer shall immediately notify the Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Board until the matter is resolved.

F. Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

G. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

H. Handling of Reported Violations

The Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

This policy is approved by the Board of Directors in their meeting held on 10 Jan 2017

