

WHISTLEBLOWER POLICY & PROCEDURES

CBM India Trust

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1. Purpose

CBM India Trust has various policies including Code of conduct, anticorruption, financial and safeguarding policies to ensure our work and behaviour adheres to the highest standards. The CBM India Trust whistle -blower system allows people to anonymously report violations of policy in a structured way.

Staff are encouraged to speak directly to their superiors or the senior management when they see or suspect misconduct or critical issues. Externals can report through the feedback mechanism. The whistleblower system however allows anonymous reporting.

CBM India Trust Whistle-blowing System allows anonymous feedback, ensures confidentiality, and involves the highest levels of the organization. CBM India Trust Policy on Preventing Corruption and Fraud ensures protection from reprisals/retaliation for the whistle-blower / complainant who makes a complaint in good faith.

The Whistle-blower system reporting is managed through a dedicated email address and directed to the Board of Trustees. The report is followed up by a senior team designated by the Board of Trustees or directly, depending on the complaint raised and according to the nature of the contents. Investigations are undertaken on a confidential basis.

The whistleblower process is open to employees, consultants, volunteers, external associates of CBM India Trust and anyone else affected by CBM India Trust's work, including partner organizations and target group/community.

CBM India Trust, Bangalore

#140, "Commerce Cube", 3rd Floor, 5th Main, Puttannachetty Road, Chamarajpet, Bangalore – 560 018.

• Tel: +91 80 2667 3631 • Email: info@cbmindiatrust.org • www.cbmindia.org

CBM India Trust management will investigate, and to correct any issues found.

2. Types of issues to be reported

- Fraud, Bribery, embezzlement or theft, corruption, facilitation payments, nepotism as mentioned in the prevention of fraud and corruption policy.
- Safeguarding issues, harassment as detailed in safeguarding and prevention of harassment policies.
- Violation of legal requirements or internal regulations or Code of Conduct
- Violation of data protection regulations
- Harassment, abuse
- Retribution against those reporting concerns in good faith.

3. Process

3.1. Reporting Channels

Concerns can be reported directly to the executive director of CBM or to a dedicated email id whistle-blower@cbmindia.org. The email is managed by the board of trustees.

The whistleblower or complainant is the person who submits a complaint on the whistleblower mechanism.

3.2. Investigation

The trustees will designate a person to be in contact with the whistleblower and put in place an investigation team with a designated head. The team will maintain strict confidentiality. In serious issues the trustees will appoint external experts such as legal/ financial/ safeguarding experts to investigate. The investigator/ investigating team will ask the whistleblower to provide clear details and specific information about the allegations.

3.3. Registers, reports and records:

The head of the investigating team will maintain the case records. Will ensure that the investigations are fair. The final report and closure of the case to be communicated by the head

An interim response will be sent from the email id whistleblower@cbmindia.org within 5 working day. The complainant will be provided with a confidential number that will allow for further anonymous communication through the email or mobile.

3.4. Resolution/ investigation

The process of resolving the concerns and issues raised will be followed as per the nature of the case raised (e.g fraud/ corruption/ dispute/ feedback)and the intensity of the case, the investigation process and as per expert advice needed(e.g. external Auditors, Lawyers, etc.).

The length of the investigation is depends on the nature of the concern raised.

3.5. Final Response to the whistleblower/complainant:

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The status/resolution of the investigation will be communicated to the complainant, by the designated person through the confidential email ID as and when possible. Due to confidentiality, it is not mandatory, that all details, procedures and contacts be disclosed or reported to the complainant.

4. Roles and Responsibilities

Role	Responsibility
Board of Trustees	- Review of the policy - Review of all whistle-blower cases - Oversight of the Whistleblower Program; - Receiving, investigating and actioning concerns involving Executive Management and Audit.
Executive Director and Senior management	Reviewing and recommending policy revisions to the Board of Trustees
Policy Owner: Director People and Culture	- Developing and maintaining the Policy; - Conducting or assigning investigations of concerns, other than those performed under the direct supervision of the board of Trustees - As appropriate, referring concerns raised to the Confidential Contact and the Executive Director
Head of investigation Process / files holder	- Designated by the board of trustees - is subjected to change based on the decision of the Board of Trustees. - Maintains the case records

5. Policy Development and Revisions

Date	Adoption /Change	Whom
	Approved	Board