

Whistle Blower Policy

Document History		
Policy Version	Policy Distribution	Effective Date and Revision
4.0	All Members	4 th October 2022
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		18 th October 2023

Objective:

- ♦ To provide a mechanism to encourage the reporting of matters that may cause financial or non-financial loss to PW or damage its reputation including anyone suspected of fraud, corrupt conduct or other inappropriate behaviour.
- ♦ To enable PW to effectively deal with reports from whistle-blowers in a way that will protect the identity of the whistle-blower and provide for the secure storage of the information served.
- ♦ To establish the policies for protecting whistle-blowers against reprisal by any person.
- ♦ To provide for an appropriate infrastructure for encouraging and protecting whistle-blower's

Definitions

- ♦ "Disciplinary Action" means any action that can be taken on the completion of /during the investigation proceedings including but not limiting to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.
- ♦ "Protected Disclosure" means a concern raised by a google form communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.
- ♦ "Subject" means a person against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.
- ♦ "Whistle Blower" is someone who makes a Protected Disclosure under this Policy.
- ♦ "Whistle Officer or Investigating Officer" or "Committee" means an officer or Committee of members who is nominated/ appointed to conduct detailed investigation.

Guiding Principles

To ensure that this policy is adhered to, and to assure that the concern will be acted upon seriously, the organization will: -

- ♦ Ensure that the Whistle Blower and/or the person processing the Protected Disclosure is not victimized for doing so
- ♦ Treat victimization as a serious matter including initiating disciplinary action on such person/(s);
- ♦ Ensure complete confidentiality.
- ♦ Not attempt to conceal evidence of the Protected Disclosure;

Coverage of Policy

The Policy covers malpractices and events which have taken place/ suspected to take place involving:

- ♦ Abuse of authority
- ♦ Breach of contract
- ♦ Negligence causing substantial and specific danger to public health and safety
- ♦ Manipulation of Organization data/records
- ♦ Financial irregularities, including fraud, or suspected fraud

- ♦ Criminal offense
- ♦ Pilferage of confidential/propriety information
- ♦ Deliberate violation of law/regulation
- ♦ Wastage/misappropriation of Organization funds/assets
- ♦ Breach of members Values, Code of Conduct or Rules
- ♦ Dishonesty, Lying, Providing wrong MIS
- ♦ Any other unethical, biased, favoured, imprudent event

Policy should not be used in place of the Organization grievance procedures or be a route for raising malicious or unfounded allegations against colleagues.

Disqualifications

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 or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention.

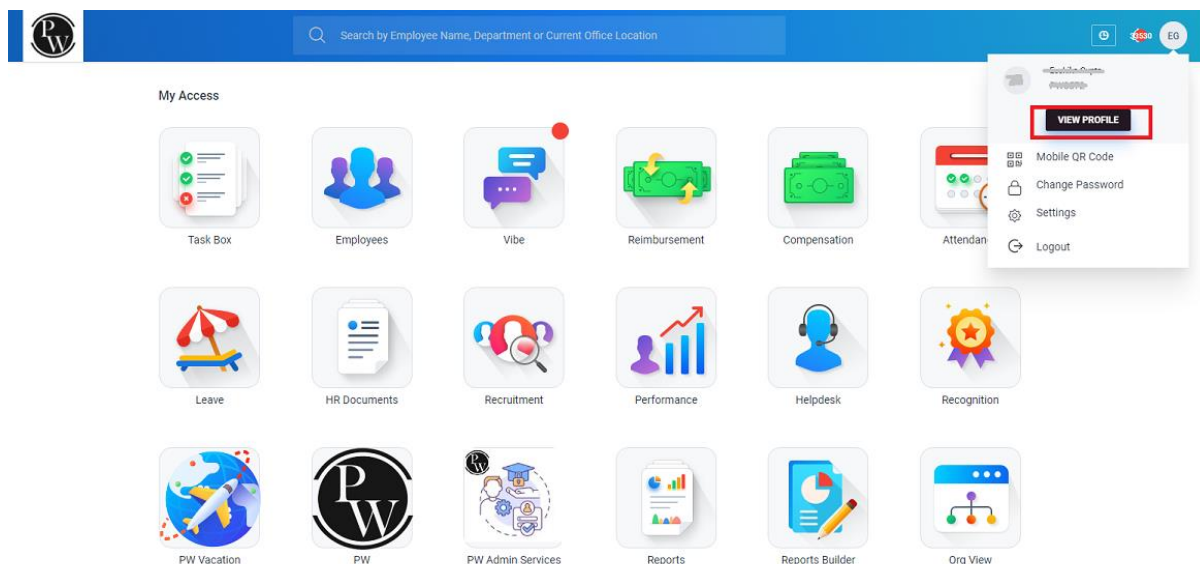
Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be mala fide, frivolous or malicious, shall be liable to be prosecuted under Organization's Code of Conduct.

Process

Members can make Protected Disclosure to Whistle Officer, as soon as possible after becoming aware of the same. The policy would also include action against people who are aware of the wrong doings and don't report.

Steps to Report

Go to your Darwin Box Dashboard > Click on the View Profile



Click on Flow Request

The screenshot shows the HRBP Role page. On the left sidebar, the 'Flows' menu is expanded, and 'Flow Requests' is highlighted with a red box. The main content area displays a table with columns for Email ID, Company, Cost Center, and HRBP Role. The 'Company' column shows 'Physics Wallah' and the 'Cost Center' column shows 'Support - 100%'. A 'DOWNLOAD' button is visible in the top right corner.

Click on Initiate

The screenshot shows the 'Flow Requests' page. The 'INITIATE' button is highlighted with a red box. The page displays a table with columns for Workflow Name & ID, Trigger Event, Initiated By, Initiated For, Custom Flow Status, Approval Status, Workflow Status, Initiated On, and Last Updated On. The table shows 'No matching records found'.

Select Whistle Blower

The screenshot shows the 'Raise a Request' form. The 'Self' radio button is selected. The dropdown menu is open, showing options: '-Select-', '-Select-', 'I3 (Idea, Innovate, Initiate)', 'Visiting Card', 'Whistle Blower', and 'Sabbatical'. The 'Whistle Blower' option is highlighted with a red box.

Fill the form & Submit

Raise a Request
☒ Self ☐ On Behalf

Whistle Blower

Initiator Form -
What is your name and Emp Code?

×

Who is involved in wrongdoing Mention Full Name and nature of association with PW Member Vendor Business, if Vendor or Business Entity then Mention Entity name?

×

What specifically the suspect do? Please mention wrongdoing malpractices and events which have taken place?

×

Who else knows about the wrongdoing Mention full name? Who can and would confirm that they occurred? How can we reach these witnesses?

×

Which division, unit, or location did the wrongdoing incident happen?

×

When did the wrongdoing occur? Is it ongoing? How frequently has it occurred?

×

What are the suspects motives? For example, how does the suspect benefit? If others benefit from the activities, who are they and how do they benefit?

×

How did the wrongdoing occur? Was there a lack of controls, circumvention of controls, or collusion with other individuals?

×

Please fill all mandatory fields. You will be able to submit only when all mandatory fields are filled.

If initial inquiries reveal no basis for the concern or deem it unsuitable for investigation under this Policy, it will be dismissed and documented. If further investigation is warranted, it will be conducted either by the investigating officer or a management-appointed committee. The investigation will be fair, impartial, and without presumption of guilt. A written report will be prepared, including:

1. Detailed record of the Protected Disclosure.
2. Information on prior disclosures and outcomes.
3. Any previous disclosures against the same subject.
4. The financial or other losses incurred or anticipated by the organisation.
5. Investigative findings.
6. Recommendations for disciplinary or other actions.

The report should be submitted within 15 days of the appointment.

Protection

Whistleblowers are encouraged to disclose their identity when making allegations. The organization strictly prohibits any form of unfair treatment, discrimination, harassment, or victimization against whistleblowers. Complete protection is provided against retaliation, threats, termination, suspension, disciplinary actions, transfer, demotion, promotion denial, harassment, or any obstruction of their duties. The whistleblower's identity remains confidential. Anyone assisting in the investigation is also protected to the same extent as the whistleblower.

Reporting

An annual report with number of complaints received under the Policy and their outcome shall be placed before the Management.

*If you have any doubts or questions regarding this policy or google form, please get in touch with HR Team
Email ID - hr@pw.live*

Any changes in the above policy will be at the sole discretion of Management. The policy is created for enhancing good work culture for the Members. Any undue advantage taken by this policy by any Member will be reflecting on individuals work ethics and he/she can be terminated by the misuse of the same.