



UNNATI
Organisation for Development Education

WHISTLEBLOWER POLICY

1. Purpose

The purpose of this Whistleblower Policy is to encourage employees, contractors, consultants, volunteers, fellow, suppliers, and other stakeholders to raise concerns about potential misconduct, unethical behaviour, or illegal activities within UNNATI Organisation for Development Education. This policy ensures that individuals who report wrongdoing are protected from retaliation and that reports are handled fairly and confidentially.

2. Scope

This policy applies to employees, contractors, consultants, volunteers, fellow, interns and third parties connected to UNNATI who wish to report any improper conduct, including:

- Fraud, corruption, or bribery.
- Financial misreporting or irregularities.
- Violations of company policies or legal requirements.
- Unsafe work practices or risks to public safety.
- Environmental violations.
- Harassment, discrimination, or other workplace misconduct.
- Any other unethical behaviours.

3. Policy Statement

UNNATI is committed to maintaining the highest standards of integrity and ethical behaviour. Any employee, contractor, or stakeholder who suspects or becomes aware of misconduct is encouraged to report their concerns through the established whistleblower channels. UNNATI will take all reports seriously and will ensure that those who raise concerns in good faith are protected from retaliation.

4. Definitions

- Whistleblower: An individual who reports suspected wrongdoing or unethical behaviour within the organization.
- Retaliation: Any adverse action taken against a whistleblower as a result of reporting concerns, including dismissal, demotion, harassment, or discrimination.
- Protected Disclosure: A report made in good faith about a legitimate concern regarding unethical, illegal, or improper conduct.

5. Reporting Procedures

Anyone with concerns about misconduct or unethical behaviour is encouraged to report them through one of the following channels:

- **Internal Reporting:** Employees can report concerns directly to their supervisor or department head. If the concern involves a supervisor or is sensitive, it can be reported to the Director.
- **Policy Compliance Committee** – The PCC can be reported in case of such cases.
- **Email:** Concerns can also be submitted via email at psu_unnati@unnati.org

6. Confidentiality and Anonymity

All whistleblower reports will be treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation. UNNATI encourages whistleblowers to provide their names to facilitate effective investigations; however, anonymous reports will also be accepted and investigated.

7. Protection from Retaliation

UNNATI strictly prohibits retaliation against whistleblowers who report concerns in good faith. Any employee or individual who retaliates against a whistleblower will be subject to disciplinary action, up to and including termination.

If a whistleblower feels they are experiencing retaliation, they should report it immediately to the Director. UNNATI will investigate and address any instances of retaliation swiftly.

8. False Reporting

While UNNATI encourages the reporting of legitimate concerns, any reports that are knowingly false, misleading, or made in bad faith may result in disciplinary action against the individual who made the report. This does not apply to reports made in good faith that turn out to be incorrect.

9. Investigation Process

Once a report is received, UNNATI will:

- Acknowledge receipt of the report (if the whistleblower's identity is known).
- Assign the report to the appropriate department or an independent investigator for review.
- Conduct a thorough and impartial investigation, gathering all relevant facts and evidence.
- Maintain confidentiality throughout the investigation process.
- Take appropriate corrective or disciplinary action if wrongdoing is found.
- Communicate the findings and outcome to the whistleblower, where appropriate and to relevant stakeholders within the company.

10. Responsibilities

- Policy Compliance Committee: Responsible for overseeing the whistleblower program, maintaining confidentiality, and ensuring that reports are investigated promptly and fairly.
- Supervisors and Managers: Responsible for fostering an environment where employees feel comfortable raising concerns and for reporting any concerns they receive through the proper channels.
- Employees: Responsible for reporting concerns in good faith and cooperating with investigations when necessary.
- Board of Directors: Responsible for ensuring that a whistleblower program is in place and effective, and that whistleblowers are protected from retaliation.

11. Awareness and Training

UNNATI will orient all employees and stakeholders whistleblower policy and reporting mechanisms. Employees will also be trained on how to recognize misconduct and the importance of reporting concerns.

12. Monitoring and Review

The whistleblower policy will be monitored and reviewed regularly by the Director and the Policy Compliance Committee. To ensure its effectiveness the Director or PCC may propose necessary amendments and updates will be communicated to employees and other stakeholders.

Approved by:

Binoy Acharya

Director

December 31, 2024