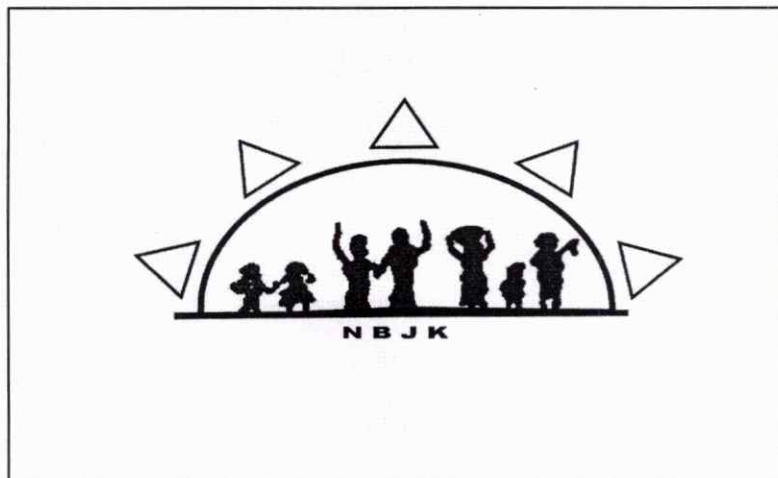


# NAV BHARAT JAGRITI KENDRA

Putting the last first .....

## NBJK Whistleblower Policy

(PERSPECTIVE, CONCEPT & ACTION)



## Nav Bharat Jagriti Kendra

At – Amritnagar, PO- Korra, Dist.- Hazaribag, Jharkhand

Phone : 9431140385 (O), 9431140508 (M)

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Nav Bharat Jagriti Kendra (NBJK) requires Employees to observe high standards of Program Activities and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the NBJK, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that NBJK can address and correct inappropriate conduct and actions. It is the responsibility of all Board Members, Branch Managers, Program Managers and other Subordinate Staffs and Volunteers to report concerns about violations of NBJK's code of ethics or suspected violations of law or regulations that govern NBJK's Activities.

### **No Retaliation**

It is contrary to the values of NBJK for anyone to retaliate against any Board Member, Branch Managers, Program Managers and other Subordinate Staffs or Volunteers 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 Activities of NBJK. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

### **Reporting Procedure**

Nav Bharat Jagriti Kendra (NBJK) has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their superiors. If they are not comfortable to speaking with their superiors or they are not satisfied with their superior's response, they are encouraged to speak with Executive Director / Secretary. Superiors and other senior staffs are required to report complaints or concerns about suspected ethical and legal violations in writing to the NBJK's Executive Director / Secretary or Compliance Officer, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their superior or the Executive Director / Secretary or the Compliance Officer of NBJK.

### **Compliance Officer authorized by NBJK**

The NBJK's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director / Secretary and/or the Board Members of all complaints and their resolution and will report at least annually to the NBJK Board on compliance activity relating to accounting or alleged financial improprieties.

### **Accounting and Auditing Matters**

The NBJK Compliance Officer shall immediately notify the Audit Committee / Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.



## 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.

## 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.

## Handling of Reported Violations

Nav Bharat Jagriti Kendra's (NBJK) 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.

**Compliance Officer:** \* {Note: The Compliance Officer may be a Board Member, the Executive Director, or a third party designated by the organization to receive, investigate and respond to complaints.}

(GIRIJA NANDAN "GIRIJA SATISH")

President  
NAV BHARAT JAGRITI KENDRA

(SATISH KUMAR "SATISH GIRIJA")

Secretary  
SECRETARY  
NAV BHARAT JAGRITI KENDRA

Adopted by NBJK as per its General Body decision of 14<sup>th</sup> December, 2023 and accordingly Executive Committee resolution no. 8 as on 14<sup>th</sup> December, 2023.

