

WHISTLEBLOWER POLICY

V1.0, April 2025

Mobile Creches' whistleblower policy aims to ensure a fair, equitable, and efficient work environment by reinforcing MC's commitment to conducting its plans with honesty and integrity and to comply with its policies & values. It is also an alternative channel to other reporting systems to learn about serious problems so that they can be resolved quickly.

What is whistleblowing:

It means reporting by employees and / or any other internal / external stakeholders, revealing information about activity within the organisation that is deemed illegal, immoral, illicit, unsafe or fraudulent. The person making the report (the 'whistleblower') discloses information about wrongdoings or misconduct, often in situations where the behavior could harm others, violate laws or regulations, or negatively affect the organization's reputation.

Who is a Whistleblower:

A Whistleblower is any person who raises a genuine concern relating to any wrongful acts, including wrongful acts which may or may not be explicitly covered in a policy, but may nevertheless be considered a violation of Mobile Creches' governance and its core values.

Purpose:

To encourage and protect employees, volunteers and other internal / external stakeholders, who raise serious concerns (about wrongdoing, malpractices) with respect to any aspect of the organization's work, to come forward and voice those concerns without fear of victimization, subsequent discrimination, disadvantage or dismissal.

Scope:

This policy applies to all employees, volunteers, vendors, board members, and other individuals associated with Mobile Creches. It covers the reporting of concerns related to unethical conduct, violation of laws or regulations, financial misconduct, safety concerns, and any other actions that may harm the organization or its mission.

What this policy covers:

Whistleblowing can involve the reporting of a wide range of issues, including (but not limited to):

- Fraud or financial misconduct (e.g., embezzlement, accounting wrongdoings)
- Harassment or discrimination (e.g., racial, gender, or sexual harassment)
- Safety violations (e.g., unsafe working conditions or practices that endanger employee health & safety)

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- Corruption or bribery (e.g., accepting or offering bribes internally / externally)
- Abuse or neglect (e.g., mistreatment of individuals)
- Concern directly related to the treatment of a stakeholder (him / herself). Such concern will be treated under this policy.

What this policy doesn't cover:

- If a concern is related to own treatment as an employee, it should be raised under the existing grievance policy.
- Concerns / complaints of misconduct are dealt with under the disciplinary misconduct policy.
- Anonymous complaint (hence, the complainant must mention his / her name).

Protection against retaliation:

Should a whistleblower acting in good faith face any direct or indirect victimization, including any form of retaliation, then disciplinary measures or further actions will be taken against any such victimizers or wrongdoers.

False or malicious allegation:

If an employee or any other stakeholder knowingly makes an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, up to and including termination of employment or association, may be taken.

Raising concern:

Employees or internal / external stakeholders may raise their concern with the CHRO through email (chro@mobilecreches.org).

Should the concern be against the CHRO then it is to be addressed to the CEO (ceo@mobilecreches.org).

Complaints against the CEO to be directed to the Chair of the Board (chairperson@mobilecreches.org)

<< Template for whistleblowing via email >>

Subject line: "Whistleblowing: Concern regarding _____"

Email body:

1. Provide the description of the alleged wrongdoing, nature of the concern and why the employee / stakeholder believes it to be true.

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2. Background and history of the concern (with relevant dates). Existing information that supports the allegation (evidence based), provide contact details for follow up.

Whistleblower mechanism:

1. Employees / stakeholders are encouraged to provide as many details as possible, however, at the same time, it is recognized that it is not whistleblower's role to investigate.
2. Complaints must be genuine and substantiated.
3. Once received, the CHRO (or appropriate recipient) will assess the concern and determine the appropriate investigative process. It may engage internal or external investigators to thoroughly investigate the matter.
4. The whistleblower will be kept informed of the status of the investigation and the findings will be addressed as appropriate.
5. Within 7 working days of the concern being raised, the person investigating the concern will confirm the following:
 - a. Acknowledgement of receiving of the concern.
 - b. Indicating the procedure to deal with the matter.
 - c. Giving information on support mechanism / details.
 - d. Sharing whether further investigation will take place or not.

Confidentiality:

All concerns received will be treated with utmost confidentiality and every effort shall be made not to reveal the identity of the whistleblower. However, in some cases, if it may be necessary to disclose the identity of the whistleblower for investigative purposes, then the whistleblower will be informed of any such disclosures.
