

WHISTLEBLOWER POLICY

I. Introduction

Antarang Foundation has formulated this Whistleblower Policy to encourage and enable employees, consultants, directors and stakeholders to report unethical behaviour, actual or suspected fraud, or violations of the organisation's code of conduct without fear of reprisal.

II. Objective

- To provide a framework for reporting genuine concerns or grievances.
- To ensure that such concerns are addressed and investigated properly.
- To protect the whistleblower from any adverse consequences.

III. Scope

This Policy covers malpractices, unethical behavior, fraud, violation of legal or regulatory provisions, or any such activity which is against the interests of the Organisation, including but not limited to:

- Breach of confidentiality
- Discrimination or harassment
- Violation of organisation policies
- Misappropriation of organisation's funds
- Any non-compliance under applicable laws

All employees, consultants, trustees, and stakeholders of the organisation; its partners and associates are eligible to make Protected Disclosures under this Policy.

The employees are required to familiarise themselves with this Policy, and seek advice from Ms Rapti Mukherjee, Director - Talent, Culture and Administration for any clarifications.

IV. Definitions

- a. "Grievance Committee" or "Committee" means, the Committee of the Board of Trustees and other members of the organisation which shall include any modification or amendment thereof.
- b. "Compliance Officer" means the Director - Talent, Culture and Administration

- c. “Director” means a Director appointed to the Board of Trustees.
- d. “Disciplinary Action” means any action that can be taken on the completion of/ during the investigation proceedings, including but not limited 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.
- e. “Employee(s)” means employee(s) of Antarang
- f. “Protected Disclosure” means the disclosure of suspected unethical or improper practices or alleged wrongful conduct in accordance with this Policy
- g. “Stakeholders” means and includes suppliers, service providers, contractors, consultants, intermediaries, donors, clients, business associates and others with whom Antarang has any financial or commercial dealings.
- h. “Whistleblower/ Complainant” means an Employee, Consultant, Trustee, Advisors or any Stakeholder who reports any unethical or improper practices or alleged wrongful conduct.

V. Protection to Whistleblower/ Complainant

The Whistleblowers will be accorded complete protection from any adverse action/unfair treatment consequent to making a Protected Disclosure under this Policy. However, making a Protected Disclosure containing a false or bogus allegation or made with a mala fide intention shall make the concerned Whistleblower liable for disciplinary action.

Any other employee assisting in the matter shall also be protected to the same extent as the Whistleblower.

If a Whistleblower has been found to have made a deliberately false Protected Disclosure, that Whistleblower may be subject to disciplinary action, which may include dismissal

VI. Confidentiality

The Whistleblower, Investigation Officers and all persons involved shall maintain confidentiality of the Protected Disclosure. The identity of the Whistleblower shall be kept confidential, and others assisting in the said investigation or furnishing evidence shall also be kept private. If any of the persons involved are found not complying with the above, he/she shall be liable for disciplinary action.

VII. Reporting of a Protected Disclosure?

The Grievance Committee at Antarang Foundation comprises:



Rapti Mukherjee
Director - Talent, Culture and Administration
Email – rapti@antarangfoundation.org

Nohid Nooreyezdan
Trustee
Email: nohid.nooreyezdan@gmail.com

Madhura Shah
Advisory Council member
Email: mshah@apollo.com

A Protected Disclosure may be lodged by sending a letter or an email to the below:

Compliance Officer

Director - Talent, Culture and Administration
Rapti Mukherjee
Email – rapti@antarangfoundation.org

In exceptional cases, a Whistleblower shall have a right to make Protected Disclosures directly to the Grievance Committee as under:

Nohid Nooreyezdan
Trustee
Email: nohid.nooreyezdan@gmail.com

VIII. Anonymous Disclosures

An anonymous Protected Disclosure, that is, any complaint or concern raised without any of the following information, viz. name, address and contact details of the Whistleblower, shall not be considered a valid Protected Disclosure, except where the Grievance Committee treats it as a special case and decides to take it up under this Policy.

The Grievance Committee shall record the reasons why it is treating such a complaint or concern as a special case.

The Grievance Committee may decide to treat a complaint or concern as a special case based on the following:

- How serious and material the issue raised is;
- How credible the concern appears;

- How feasible it appears to corroborate the facts with attributable sources;
- Does the concern appear to have been in good faith;
- Does the concern appear factual and not speculative in nature.

A record of anonymous complaints received shall be maintained giving details of how they were received and dealt with.

IX. Enquiry and Investigation

a. The procedure

On becoming aware, the Director – Talent, Culture and Administration, either Suo-moto or otherwise, of actual or suspected misconduct or any other known or unknown person, shall look into such misconduct and/or complaint and shall follow the below-mentioned procedure in order to enquire and/or investigate the matter. The Director - Talent, Culture and Administration shall conduct a Preliminary enquiry, which is a fact-finding exercise. The object of preliminary enquiry is to ascertain the truth or otherwise of the allegations contained in the Protected Disclosure, if any, and to collect necessary available material in support of the allegations, and thereafter to decide whether there is justification to embark on any disciplinary action.

The Director - Talent, Culture and Administration shall appoint and/or authorize any person(s) or external agency as it may deem fit, to initiate/conduct an enquiry to collect the relevant fact, material substances on actual or suspected misconduct or may also refer the matter to the Board of Trustees/ Trustee nominated to serve as the point of contact. If the Grievance Committee is of the opinion that the disclosure received has no basis then it shall be dismissed. The same shall be reported and recorded in the subsequent Trustee meeting. If the Grievance Committee is of the opinion that the matter needs to be investigated further, the Grievance Committee shall decide further course of action.

After evaluating the merits of the case, the Committee shall recommend appropriate action to the Management (Senior Leadership Team and Board of Trustees) on completion of the investigation.

b. Disciplinary Action:

The Management shall deliberate on the report so submitted and take appropriate disciplinary action which will depend on the circumstances and seriousness of the matter. The disciplinary action(s) may include wage freeze, suspension, recovery, termination of employment contract/agreement, etc., as may be decided by the Management.

X. Reporting

A quarterly report with the number of complaints received under the Policy and their outcome shall be placed before the Board of Trustees by the Grievance Committee.

XI. Retention of documents

All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the organisation for a minimum period of seven years.

XII. Review/ Modification of the Policy

The Board reserves the right to amend, modify or review this Policy along with the rationale for the same in whole or in part, at any point of time, as may be deemed necessary. In the event of any conflict between this Policy and the provisions contained in the Listing Regulations, the Regulations shall prevail.

XIII. Disclosure on website

This Policy shall be disclosed on the website of the organisation.

Field	Details
Handbook Name	Whistleblower Policy
Handbook Owner / Writer	Rapti Mukherjee Director - Talent, Culture and Administration
Version	1
Effective Date	September 2026
Next Review Date	September 2027
Approved By	Priya Agrawal Founder Director
Applies To	Everyone working with Antarang