	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--


NEDFi's

Whistle Blower Policy

(Version 3.0)

August 2025

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 1
--	-------------------------------------	---------------------------------------	-----------------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

Policy Title	NEDFi's Whistle Blower Policy (NWBP)
Version Number	NWBP - 3.0
Effective Date	Effective Date 01/04/2022
Prepared by	Risk Management Department
Initiated by	Chief Vigilance Officer (CVO)
Approved by	Board of Directors'
Last Revision	28.05.2024
Next Revision	-
Policy Contains	19 Pages (Including cover page)

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 2
--	-------------------------------------	---------------------------------------	-----------------



	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

TABLE OF CONTENTS

1.	Introduction	4
2.	Policy Objectives	4
3.	Important Definitions	5
4.	Scope and Coverage of Policy	5
5.	Guiding Principle	6
6.	Reporting Mechanism/ Lodging of Protected Disclosures	7
7.	Protection to Whistle Blower	7
8.	Disqualification from Protection	9
9.	Secrecy and Confidentiality Mechanism	9
10.	Procedure of Investigation	10
11.	Mechanism for Action/ Reporting on Such Disclosures	10
12.	Recourse available with the Whistle Blower	11
13.	Conflict of Interest	11
14.	Review of Status Report	12
15.	Implementation of the Policy	12
16.	Record Keeping	12
17.	Review of the Policy	12
	Annexure	13

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 3
--	-------------------------------------	---------------------------------------	-----------------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
--	--	--

NEDFi's Whistle Blower Policy (NWBP)

1. Introduction

The Corporation believes in conducting all affairs of its constituents in a fair and transparent manner by adopting the highest standards of honesty, professionalism, integrity, values and ethical behaviors. The Corporation is committed to develop a culture where it is safe for any person to raise concerns about any poor or unacceptable practice prevalent in the Corporation or any events of misconduct in the course of its business operation.

Section 177 of the Companies Act (Meetings of Board and its Powers), 2013, inter-alia, requires all the listed companies, companies which accept deposits from the public and companies which have borrowed money from banks and public financial institutions in excess of Rs.50.00 (Fifty) Crores to establish a mechanism called “Vigil Mechanism (Whistle Blower Policy) for directors and employees/ sister concern to report genuine concerns or grievances, providing adequate safeguards against victimization of those who avail of such vigil mechanism and overseeing of such vigil mechanism by the Audit Committee.


Although the ‘Whistle Blower Policy’ is not applicable to the Corporation in terms of Section 177(9) of the Companies Act, 2013. However, as a matter of good corporate governance and to have proper vigil mechanism, the Corporation has framed this ‘Whistle Blower Policy’. Whistle Blowing is not meant to tarnish the image of the organization, but in fact it aims at exposing the illegal and unethical activity that may spoil the reputation of the organization. Whistle Blowers are considered as an integral piece to bring accountability to the organization.

The purpose of this Policy is to provide a framework to promote responsible and secure Whistle blowing. It helps in creating an environment where employees freely raise concerns with an appropriate authority without any fear of victimization. It protects the Whistle Blower wishing to raise a concern about irregularities within the Corporation.

2. Policy Objective

- (i) The objective of Whistle Blower Policy is to ensure the highest standards of ethical, moral and legal conduct of business operations and to build a lasting and strong culture of Corporate Governance within the Corporation. In terms of Policy, an internal mechanism is established for employees to report to the management, concerns about unethical behavior, actual or suspected fraud or violation of the Corporation’s Code of Conduct Policy.
- (ii) The Policy is intended to encourage all employees of the Corporation to report suspected or actual occurrence of illegal, unethical or inappropriate actions, behaviors or practices by staff members without fear of retribution. The employees can voice their concerns on irregularities, malpractices and other misdemeanors through this policy.

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors’	Issued by: Chief Vigilance Officer	Page 4
--	-------------------------------------	---------------------------------------	-----------------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

- (iii) The Policy is intended to make Whistle Blower well aware of the process and the steps to be taken before blowing the whistle.
- (iv) The Policy also provides necessary safeguards and protection to the employees who disclosed the instances of unethical practices/ behavior observed in the Corporation.


3. Important Definitions

- (a) **Whistle Blower** is defined as the employees of the Corporation making the disclosure under this policy. The Whistle Blower's role is that of a reporting party. Whistle Blowers are not investigators or finders of facts; neither can they determine the appropriate corrective or remedial action that may be warranted.
- (b) **"Designated Official"** means Chief Vigilance Officer (CVO) of the Corporation to receive Protected Disclosures from whistle blowers, maintain record thereof, conduct investigation under this policy, and implement the Policy in the Corporation.
- (c) **"Subject – Branch / Employee"** – The specific branch and/ or employee in respect of whom disclosure is being made.
- (d) **"Employees"** means all employees of the Corporation including officers, executives, and office assistants, and also those under contract service in the Corporation.
- (e) **"Protected Disclosure (PD)"** are any communication, whether by letter/ email/ on designated portal or over telephone, relating to unethical practice or behavior or violation of service rules, made in good faith by the whistle blower. Protected Disclosures should be factual and not speculative in nature and must contain as much specific information as is possible to allow for a proper assessment of the concern.
- (f) **"Reviewing Authority"** means General Manager (Fraud Monitoring) of the Corporation who upon receiving the remarks and recommendation from the Designated Official, take a view on closure of the compliant or forward the same to the concerned department for initiation of disciplinary proceedings.
- (g) **"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, recovery of financial loss incurred, suspension/ termination from the services or any such action as is deemed to be fit considering the gravity of the matter.
- (h) **"Investigators"** means any person(s) duly appointed/ consulted by the Designated Official to conduct an investigation under this policy.
- (i) **"Audit Committee of the Board"** means the Audit Committee constituted by the Board of Directors of the Corporation in accordance with the provisions of Sec 177 of the Companies Act, 2013 and other applicable Law, rules or regulations.
- (j) **"Directors"** means a Director on the Board of Directors of the Corporation whether whole time or otherwise.

4. Scope and Coverage of the Policy:

All employees of the Corporation including contractual employees posted at H.O./ Branches/ Representative Offices are covered under this Policy. This policy covers all

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 5
--	-------------------------------------	---------------------------------------	----------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

malpractices and events that have taken place or suspected to have taken place including, but not limited to the following:

- Corruption;
- Frauds;
- Misuse/ abuse of official position;
- Manipulation of data/ documents;
- Financial Irregularities;
- Intentional or deliberate non-compliance and/ or violation of law, rules, regulations and policies;
- Breach of the Code of Conduct;
- Criminal offences;
- Any act resulting in financial loss/ operational risk, loss of reputation, etc.

The details in the complaint should be specific and verifiable.

However, the policy does not cover:

- Protected Disclosures that are frivolous in nature
- Issues relating to personal grievance (incremental, promotion, etc.)
- Sexual harassment which is covered by the Policy on Prevention of Sexual Harassment at Work place will be routed to the NEDFi's Internal Complaints Committee for suitable action and appropriate closure.

Also, this Policy shall not be used in place of Corporation Grievance Procedure or be a route for raising malicious or unfounded allegations against colleagues.

5. Guiding Principle:

a.) As regards the roles of the Whistle Blower:


- i. The role of the Whistle Blower is only that of a reporting party, citing the reasons/ basis of such reporting under the provision of this Policy.
- ii. The Whistle Blower shall not act as an investigator at any time nor would she/ he be entitled to prescribe remedial actions/ penalties etc.
- iii. While the Whistle Blower may be called upon to co-operate with the Corporation's Designated Official/ Reviewing Authority/ Audit Committee on their specific request in the course of investigations, she/ he cannot seek their audiences as a matter of right.

b.) As regards of the Corporation:

In order to ensure that this Policy is adhered to, and to ensure that the concern raised under this Policy will be acted upon seriously, the Corporation will:

- i. Ensure that Whistle Blower and/ or the person processing the Protected Disclosure is not victimized;
- ii. Ensure completed confidentiality of the identity of the Whistle Blower;
- iii. Not attempt to conceal evidence of the Protected Disclosure;

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 6
--	-------------------------------------	---------------------------------------	----------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

- iv. Provide an opportunity of being heard to the persons involved, especially to the Subject;
- v. Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made/ to be made;
- vi. Ensure disciplinary action is taken against person(s) found guilty pursuant to requisite investigations;
- vii. Treat victimization of Whistle Blower as a serious matter and initiate disciplinary action against person(s) causing or allowing victimization of Whistle Blower.

6. Reporting Mechanism/ Lodging of Protected Disclosures


The HR Department of the Corporation will arrange to circulate the name, telephone number and email address of the Designated Officer(s) to enable the employees to register their complaints under Whistle Blower Policy. Any employee willing to disclose information may do so in any of the following manner.

- (i) In writing on prescribed format (Annexure-I), duly addressed to the Designated Officer(s) in a sealed envelope specifically super-scribed as “Protected Disclosure under Whistle Blower Policy” to the Designated Official. Efforts should be made not to disclose the identity of Whistle Blower on the top of the envelope containing the disclosure.
- (ii) The Whistle Blower should put suitable proof of his identity/ contact numbers/ address so that additional information, if any, can be obtained. In case identity cannot be ensured, the complaints will be treated as anonymous/ pseudonymous complaints and may not attract further action.
- (iii) Complaints can also be sent to the designated email ID created for the purpose from the official e-mail id of the employee. The contact details/ address of the Whistle Blower should however be provided. In case of absence/ incorrectness of the same, the complaints will be treated as anonymous/ pseudonymous complaints and may not attract further action.
- (iv) The Disclosure whether by letter/ email/ portal. should provide specific and verifiable information in respect of the “Subject – Branch/ Employee”.
- (v) Concerns expressed anonymously will not be considered unless the disclosures have adequate merit in the opinion of the Designated Official.

7. Protection to Whistle Blower:


- (i) The Corporation will protect the confidentiality of the complaints and their names/ identity will not be disclosed except as statutory required under law and in cases where the Whistle Blower turns out to be vexatious or frivolous and action has to be initiated against the Whistle Blower.
- (ii) Further, identity of the Whistle Blower will not be disclosed to the Investigating Official.

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 7
--	-------------------------------------	---------------------------------------	----------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

- (iii) The Whistle Blower(s) under this Policy are entitled to adequate protection provided the Protected Disclosure is made in good faith and the Whistle Blower has reasonable information or documents in support thereof and no disclosures are made for personal gain or on account of animosity against the Subject(s). It will be ensured that the Whistle Blower is not victimized for making the disclosure.
- (iv) Any other person assisting in the said investigation or furnishing evidence and / or witnessed named in the Protected Disclosure, shall also be protected to the same extent as the Whistle Blower.
- (v) The Corporation, as a policy, condemns any type of discrimination, harassment, victimization or any other unfair employment practices being adopted against Whistle Blowers. Complete protection/ safeguard will therefore be given to Whistle Blowers against any unfair practices like retaliation, threat or intimidation of termination/ suspension of service, disciplinary action, transfer, demotion, refusal of promotion or such as, any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his/ her duties/ functions including making further Protected Disclosure.
- (vi) In case of victimization in such cases, serious view will be taken including departmental action on such persons victimizing the Whistle Blower.
- (vii) If any person is aggrieved by any action on the ground that he is being victimized due to the fact that he/ she had filed a complaint or disclosure, he may file an application before the Reviewing Authority, seeking redressal in the matter, wherein the Reviewing Authority may give suitable directions to the concerned person or the authority.
- (viii) Even after the intervention of Reviewing Authority, if the Whistle Blower feels that he/ she is still being victimized or has suffered adverse treatment; he/ she should submit a formal complaint to the Chairman of the Audit Committee. If it appears that there are reasonable grounds for making complaint by the Whistle Blower, the onus will be on the person against whom complaint of adverse treatment has been made, to prove that the same is not the case or that the actions complained of were not taken in retaliation to the concern raised by the Whistle Blower.
- (ix) To protect the interest of Whistle Blower for any adverse reporting in Annual Appraisal/ Performance Report, he/ she may be given an option to request for a review of his/ her Annual Report by the next higher Authority of the Reviewing Authority of his/ her Report within three (3) months after the disclosure of the relevant financial year ending 31st March.
- (x) If any Whistle Blower makes an allegation in good faith, but if such allegation is not confirmed by the investigation then no action will be taken against the Whistle Blower.

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 8
--	-------------------------------------	---------------------------------------	----------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
--	---	--

- (xi) However, Whistle blowers, who make any Protected Disclosure, which have been subsequently found to be mala fide, frivolous or for personal gain, the Corporation reserves its right to initiate appropriate disciplinary action against him/ her. However, such Whistle Blower(s) would be afforded an opportunity of personal hearing before taking any penal action.
- (xii) In case of repeated frivolous Protected Disclosure being filed, the Audit Committee may take suitable action against the concerned person. However, such Whistle Blower(s) will be afforded an opportunity of personal hearing taking any personal penal action.

8. Disqualification from Protection

Protection under the Policy would not mean protection from departmental action arising out of false or bogus disclosure made with mala fide intention or complaints made to settle personal grievance.

- (i) Whistle blowers, who make any Protected Disclosure, which have been subsequently found to be mala fide, frivolous or for personal gain, shall be liable to be prosecuted and appropriate disciplinary action will be taken against them under the Corporation's Code of Conduct/ Service Rules only when it is established that the complaint has been made with intention of malice.
- (ii) This Policy does not protect an employee from an adverse action which occurs independent of his disclosure under this policy or for alleged wrongful conduct, poor job performance, any other disciplinary action, etc. unrelated to a disclosure made pursuant to this policy.


9. Secrecy and Confidentiality Mechanism

- (i) The complaints received under Whistle Blower Policy on the prescribed format (Annexure-I) will be opened by the addressee only.
- (ii) Upon receipt of Complaint, the Designated Official will enter the particulars of Complaint in the Register (Annexure-IIA) and allot a code number on all the pages of the complaint. The first page containing the whereabouts of Whistle Blower along with the envelope will be retained with the custody of Designated Official. The subsequent pages containing the details of Whistle Blower case will be handed over to investigator(s) for investigation purpose. The Designated officer will strive to ensure that identity of Whistle Blower is not disclosed. The register as per Annexure IIA will be confidential and retained with the Designated Official.
- (iii) The particulars of the Complaint will be recorded in the prescribed Register (Annexure-IIB).

The Whistle Blower, the Subject, the Designated Officer(s) and Investigator(s) and other members involved in the process shall:

- (i) maintain complete confidentiality / secrecy of the matter

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 9
--	-------------------------------------	---------------------------------------	----------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

- (ii) discuss only to the extent or with the persons required for the purpose of completing the process and investigations
- (iii) not keep the papers unattended at any time
- (iv) keep the electronic mails/ files under password

If anyone is found not complying with the above, he/she shall be liable for such disciplinary action as is considered fit.


10. Procedure of Investigation

- (i) All the Protected Disclosure received through various means specified above will be categorized into two broad categories:
 - a. Protected Disclosure against CMD and/ or any other member of the Board of Directors;
 - b. Protected Disclosure against Employees
- (ii) The Protected Disclosure matter reported against CMD and / or any other member of the Board, the matter will be routed/ placed before the Board in its first available meeting (from the date complaint is filed) to decide regarding the appropriate Board Committee to look into the same. Final redressal of the complaints against the Directors shall be disposed by the Board.
- (iii) The redressal of the Protected Disclosure filed against Employees will be done through the procedure as mentioned in the Section 11.

11. Mechanism for Action/ Reporting on Such Disclosures

- (i) The Designated Official shall, on receipt of the complaint, arrange to verify the identity of the Whistle Blower.
- (ii) Proper record will be kept of all disclosure received (Annexure-II A & B). The action taken against each disclosure will also be noted and put up to the Reviewing Authority within 7 days of receipt of complaint.
- (iii) Only on being satisfied that the disclosure has verifiable information, necessary enquiry/ investigation will be done with regard to the complaint. The Designated Official will also have the authority to seek the assistance/ support from other departments/ officers to conduct enquiry/ investigation. The process of investigation will be completed within 45 days of receipt of the complaint.
- (iv) The identity of the Whistle Blower will not be disclosed to the officials conducting the enquiry / investigation. In case additional information is required to be collected from the Whistle Blower, it will be through the Designated Official.
- (v) Any inquiry / investigation conducted against any Subject shall not be construed by itself as an act of accusation and shall be carried out as a neutral fact finding process, without presumption of any guilt.

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 10
--	-------------------------------------	---------------------------------------	-----------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

- (vi) The inquiry / investigation shall be conducted in a fair manner and provide adequate opportunity for hearing to the affected party and a written report of the findings should be prepared for submission.
- (vii) A time frame of maximum 45 days will be permitted to complete the investigation / enquiry. In case the same cannot be completed within the stipulated period, interim report should be mandatorily submitted by the Investigating Officer, giving, inter-alia, the tentative date of completion.
- (viii) Depending upon the nature of the disclosure and its gravity, the Designated Official will take a view to take up the investigation on a priority basis and fix shorter time frame for its completion.
- (ix) In case the disclosure made does not have any specific and verifiable information, the Designated Official will be authorized not to take any action. This would be suitably recorded and placed before the Reviewing Authority.
- (x) In case the allegations made in the disclosure are substantiated, appropriate departmental action as per the provisions of service conditions in vogue will be taken against the employee concerned on whose part the lapses are observed.
- (xi) If any investigation leads the Designated Officer to conclude that an improper or unethical practices/ act has been committed, the Designated Officer shall recommend to the Reviewing Authority, such disciplinary or corrective action as he/ she may deem fit.
- (xii) The Reviewing Authority, after considering the recommendations, shall take decision on appropriate disciplinary or corrective action as per the Service Rules/ Code of Conduct of the Corporation.
- (xiii) The action taken against the Subject/ employee as stated in the above paragraph will be in addition to any other action or prosecution which may be initiated against said subject/employee under any statute or law in force.
- (xiv) Roles and Responsibilities of Designated Authority and Reviewing Authority are given in Annexure-A.
- (xv) The Workflow Chart of Whistle Blower Mechanism is given in Annexure –B.


12. Recourse available with the Whistle Blower

- (i) In case, there is no resolution within 90 days of receipt of Protective Disclosure, the Whistle Blower has option to escalate the issue to the Reviewing Authority of the Corporation.
- (ii) If the resolution is not to the satisfaction of the Whistle Blower, he/ she has right to approach the Chairman of the Audit Committee.

13. Conflict of Interest:

- (a) Where there is a possibility of conflict of interest of the Designated Officer in the course for investigation, the Designated Officer shall handover the details of the case to the Reviewing Authority who shall direct the investigation;

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 11
--	-------------------------------------	---------------------------------------	------------------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

- (b) Where there is a possibility of conflict of interest of the Reviewing Authority in the matter, the Designated Officer shall directly forward the recommendation related to the case to the Chairman of the Audit Committee;
- (c) Where any investigating official or a member of the Audit Committee has a conflict of interest in the matter, he/ she shall recuse themselves and the remaining members may proceed to deal with the matter.

14. Review of Status Report

- (i) Functioning of the Scheme will be reviewed by the Reviewing Authority at quarterly basis.
- (ii) The Designated Officer shall submit a status report on the prescribed format (Annexure-III) to the Reviewing Authority and any other information relating to the disclosures received under the Whistle Blower Scheme on half-yearly basis. The status report would include the following-
 - a) Status of the disclosure received during the present and prior period and the action taken thereon.
 - b) The special areas which need focused attention.
 - c) The nature of disclosures made and their Circle wise distribution.
- (iii) The Reviewing Authority shall submit consolidated status report of the Corporation, to the Audit Committee of the Board on half-yearly basis with action taken report.

15. Implementation of the Policy

The Designated Official will ensure that the Policy and its subsequent revised versions are known to all employees. This policy can be changed, modified, rescinded or abrogated at any time by the Corporation.


16. Record Keeping:

All the documents including the investigation reports related to Protective Disclosures shall be maintained by the Corporation for a period of eight (8) years or such other period as specified by any other law in force, whichever is more.

17. Review of the Policy:

The Audit Committee of the Board shall review the policy at least once in a year or as and when deemed necessary and shall recommend all necessary changes/ modifications to the Board for consideration and adoption.

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 12
--	-------------------------------------	---------------------------------------	-----------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

Annexure - A

Roles and Responsibilities

Human Resource Department (HRD)

1. To circulate the name, telephone number, e-mail address of the Designated Officer(s) in the Corporation to enable the employees to register their complaints under Whistle Blower Policy.


Designated Authority:

1. Encourage all employees of the Corporation to report suspected or actual occurrence of illegal, unethical or inappropriate actions, behaviours or practices by employees without fear of retribution.
2. The Designated Authority will be the focal point to receive the complaint from the Whistle Blower.
3. Ensure that the identity of Whistle Blower is not disclosed. It also provides the necessary safeguard and protection to the employees who disclose the instances of unethical practices/ behaviour observed in the Corporation.
4. Appoint / authorize any official to conduct an investigation under this policy who will submit the report to Designated Authority.
5. On the basis of investigation report, Designated Authority will forward the same to Reviewing Authority with his/ her remark and recommendation.
6. The Designated Officer shall submit a status report on the prescribed format (Annexure-III) to the Reviewing Authority and any other information relating to the disclosures received under the Whistle Blower Policy on half-yearly basis.
7. The Designated Authority will be responsible to implement the policy and ensure that the policy is known to all employees.

Reviewing Authority:

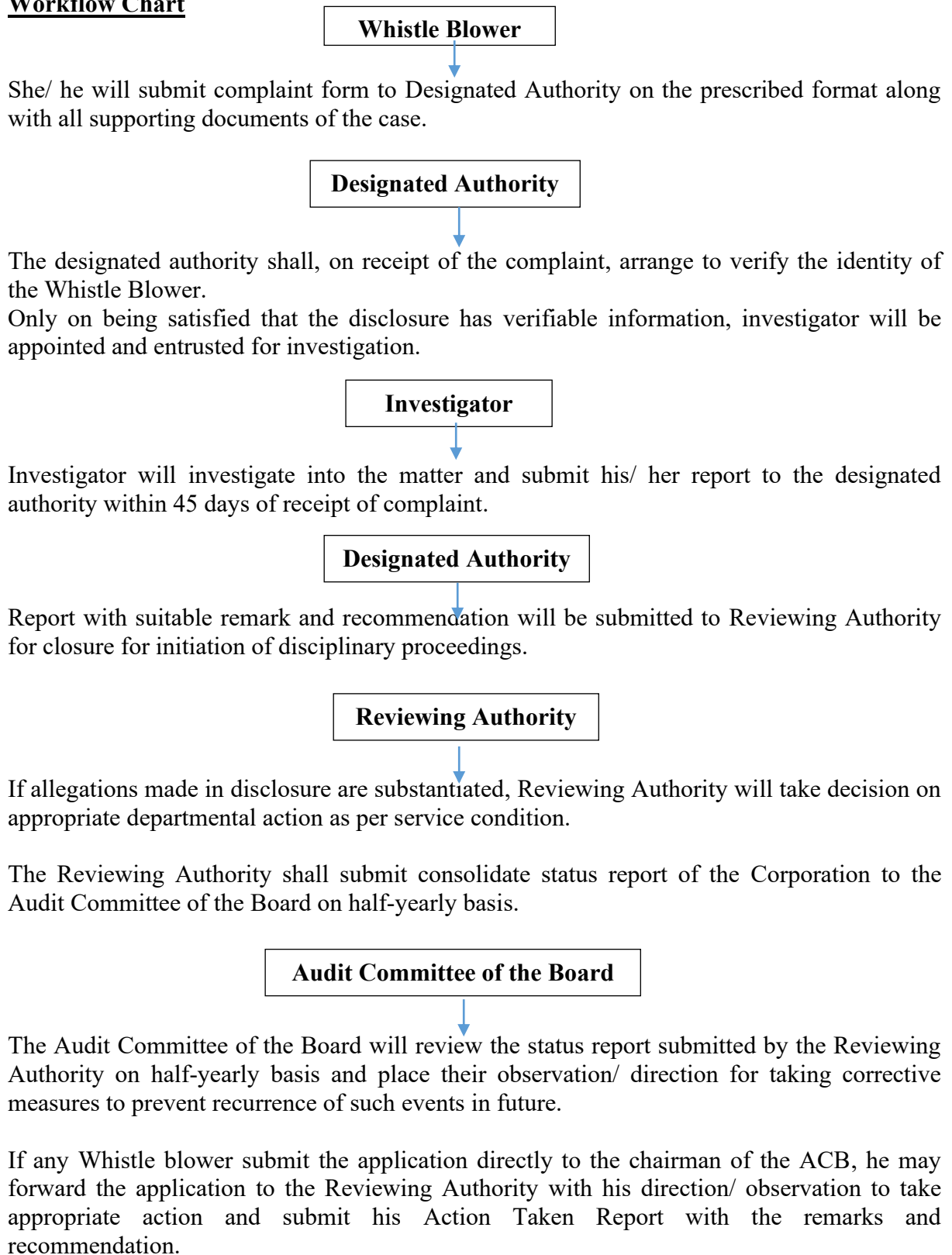
1. Functioning of the Policy will be reviewed by the Reviewing Authority on half-yearly basis.
2. Upon receiving the investigation report along with the Designated Authority's remark and recommendation, Reviewing Authority may take a view on closure of the complaint or forward the same to the concerned department for initiation of disciplinary proceedings.
3. If any person (Whistle Blower) is aggrieved by any action on the ground that he is being victimized due to the fact that he had filed a complaint or disclosure, he may file an application before the Reviewing Authority, seeking redressal in the matter, wherein the Reviewing Authority may give suitable directions to the concerned person or authority.
4. Reviewing Authority shall submit consolidated status report of the Corporation, to the Audit committee of the Board on quarterly/ half-yearly basis, with Action Taken Report.

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 13
--	-------------------------------------	---------------------------------------	-----------


	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

Annexure - B

Workflow Chart



Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 14
--	-------------------------------------	---------------------------------------	------------------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

ANNEXURE-I

WHISTLE BLOWER COMPLAINT FORM

Code No		Date of filing Complaint		Initial of Designated Official	
---------	--	-----------------------------	--	-----------------------------------	--

(For use of Designated Authority, Do not write anything above it)

(FOR THE STAFFS POSTED AT HEAD OFFICE/BRANCHES/ ITS ESTABLISHMENT)

To
Designated Officer
NEDFi
Guwahati

A. PERSONAL INFORMATION OF WHISTLE BLOWER

1. Name: _____

2. P.F.Index No. _____ ID Proof* _____

3. Present Postings Details:

a) Brand/Office: _____

OR

b) Department/Office: _____ Address: _____

4. Contact Number (R) _____ (O) _____

Cell No. _____ email address _____

5. Person(s) against whom the complaint is made: As per enclosed sheet.

6. Details of Complaint: As per enclosed sheet.

DECLARATION


I declare that the above information is furnished by me under Whistle Blower Policy of the Corporation which is true and correct to the best of my knowledge, information and belief.

Signature

Date

*Copy of ID proof must be enclosed along with Complaint Form.

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 15
--	-------------------------------------	---------------------------------------	------------------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

B. WHISTLE BLOWER COMPLAINT

BRIEF FACTS OF THE CASE REPORTED UNDER

Code No		Date of filing Complaint		Initial of Designated Official	
---------	--	-----------------------------	--	-----------------------------------	--


(For use of Designated Authority, Do not write anything above it)

Statement of facts: (Please use extra pages if necessary)

Statement detailing acts of commissions/omissions of the person(s) against whom disclosure is made: (Please use extra pages if necessary)

Was this disclosure made to anyone in the past? If yes, when and to whom.

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 16
--	-------------------------------------	---------------------------------------	------------------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

ANNEXURE-II

A. WHISTLE BLOWER COMPLAINT REGISTER


STRICTLY CONFIDENTIAL AND SOLELY FOR THE USE OF DESIGNATED OFFICIAL

Date of filing Complaint	Case No	Name of Whistle Blower	Details of Whistle Blower	Branch	Person against whom reported	Code No.	Initial

B. WHISTLE BLOWER FOLLOW-UP REGISTER

Date of filing Complaint	Code Number	Branch	Person Against whom reported	Brief Details of Complaint	Date of Action Taken	Nature of Action taken	Date of closure of case	Action report submitted to Review Authority on	Initial

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 17
--	-------------------------------------	---------------------------------------	------------------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

ANNEXURE-III

**NEDFi
FRAUD MONITORING DEPARTMENT/CELL**


**STATUS REPORT OF COMPLAINTS RECEIVED UNDER WHISTLE BLOWER
POLICY FOR THE QUARTER ENDING
MARCH/JUNE/SEPTEMBER/DECEMBER-20__**

Review of Whistle Blower cases					
Opening No of Complaints as on	Received during the Quarter	No of cases rejected	No of cases where Investigation initiated	No of cases pending	No of cases where action taken against whistle blower for malafide
No. of cases where disciplinary action taken against employee under Whistle Blower Policy					
No. of frauds detected under Whistle Blower Policy					
Major areas of the Corporation reported under Whistle Blower Policy					
Remedial Action to be taken					

Department
Place:
Date:

Signature of Reviewing/ Designated Authority

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 18
--	-------------------------------------	---------------------------------------	------------------

	<p style="text-align: center;">NEDFi's Whistle Blower Policy (NWBP)</p>	<p>Doc. No: NEDFi/Policy/NWBP Version: NWBP 3.0 Revision No: 2 Revision Date: 17.07.2025</p>
---	--	--

ANNEXURE - C

Policy Revision History

SN	Date of Revision	Ver. No.	Remarks/Amendments
1	28.05.2024	2	No Changes Proposed
2	17.07.2025	3	<ul style="list-style-type: none"> • 'information to be sent through Corporation's portal' deleted • Periodicity of review of the Policy changed to 'at least once in 3 years or as and when deemed necessary'

Initiated by: Chief Vigilance Officer	Approved by: Board of Directors'	Issued by: Chief Vigilance Officer	Page 19
--	-------------------------------------	---------------------------------------	------------------