WHISTLE BLOWER POLICY - 2026

Division: Chennai

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1.0 Introduction

The Whistle Blower Policy has been framed to safeguard the Bank against internal/external threats like frauds, bribery, corruption, abuse of authority, non-compliance with laid down systems and procedures, transgression of delegated authority etc., involving financial and reputational implication. It is also intended to ensure that a few unscrupulous staff members are not vitiating the overall atmosphere/work culture and putting the Bank's interest in jeopardy. The overall aim of this procedure is to ensure that complaints are dealt with quickly and fairly and at the most appropriate level within the Bank.

2.0 Eligibility

All employees and non-employees are eligible to make complaints to the Complaint Overseer. The term 'employee' in these sections refers to cadre, contracted, trainee, temporary and part-time employees.

3.0 Scope

The Whistle Blower's role is that of a reporting party with reliable information and it intends to unearth serious concerns that could have grave impact on the operations and performance of the business of the organization.

A complaint may relate but not limited to any of the following.

1. Questionable accounting or auditing matters
2. Internal control weaknesses
3. Bribery and/or undue commissions

   E.g., An indication of major changes in life style of an employee without a genuine reason.
4. Falsifying records
5. Insider dealings
6. Money laundering under Prevention of Anti-Money Laundering Act
7. Theft and fraud
8. Misusing of Bank's assets
9. Violation of Code of Conduct for employees
10. Misrepresentation or false statements

11. Any other action that are unethical or contrary to proper corporate governance and stewardship policies and will be harmful to the financial health or reputation of the Bank.
12. Any other unlawful or illegal acts
13. Any Bank matter involving abuse of authority
14. Breach of IT Security and Data Privacy
15. Breach of any law, statute or regulation by the Bank

4.0 Employee Complaints

Complaints related communications are intended to be used for serious and sensitive issues. Employees are entitled to submit such concerns anonymously and in confidence to the Complaint Overseer who is required to investigate all complaints received within the time limits specified in this policy and report back to the Audit Committee on the status of the investigation on all complaints received.

The Bank is committed to facilitating open and frank communication with respect to the above matters and this policy aims to provide a medium for this communication that enables employees to voice their concerns while ensuring that they are protected from reprisals for reporting matters in concern in good faith.

Employees are encouraged to raise any legitimate concerns promptly, and are entitled to remain anonymous or to request that their identity not be disclosed if they so choose. Employees are not expected to prove the truth of an allegation. However, they should be able to demonstrate to the Complaints Overseer or other person contacted that there are sufficient grounds for concern.

Neither the Bank nor any of its employees may retaliate, victimize, harass, or otherwise discriminate or invoke reprisals against any employee for providing information regarding any conduct that the employee reasonably believes constitute a serious matter as defined in the scope above. Every effort will be made by the Bank to ensure that the whistleblower's identity is protected in instances where confidentiality is desired by the employee.

5.0 Non-Employee Complaints

Customers and concerned members of general public are entitled to make complaints anonymously and in confidence to the Complaint Overseer who is required to investigate complaints provided that the complaints received are within the scope

defined in this document within the time limits specified in this policy and report back to the Audit Committee on the status of the investigation on all complaints received. The Bank is committed to facilitate an open dialog with customers and concerned members of the general public with respect to the scope of matters stated in this policy with the aim to provide a mechanism for them to voice their concerns made in good faith.

Non employees are encouraged to raise any legitimate concerns promptly, and are entitled to remain anonymous or to request that their identity not be disclosed if they so choose. Non employees are not expected to prove evidence of an allegation. However, they should be able to demonstrate to the Complaints Overseer that there are sufficient grounds for concern.

LIST OF DOCUMENTS TO BE MAINTAINED

a. Copy of complaint in hard form that can be filed and preserved
b. Copy of the complaint in soft form that can be provided through email whenever required
c. Records collected during investigation including, electronic data and documents
d. Reports submitted by the investigators
e. Final reports submitted
f. Audit Committee reports/reviews
g. Back-up of Committee papers
h. Any communication to/from the Bank.
i. Records of action taken
j. Notes/details submitted to Audit Committee
k. Any other working papers relevant to the case.

6.0 Commitment of the Complaint Overseer

The Bank Chief Internal Auditor will act as the Complaint Overseer. Matters reported will be investigated and dealt with promptly and appropriately in accordance with their nature. The complaint initiator will be given the opportunity to follow-up on their complaint within two weeks of receipt. The follow-up will include

acknowledgement of the reported item, proposed action to be taken and an estimate of time that it will take to arrive at a resolution of the issue.

The Complaint Overseer will be responsible for preparation and presentation of a report to the Audit Committee, containing a summary of the complaints received status of investigations in progress and details of complaint resolutions where they have been settled since the last report. The Audit Committee will provide a summary report to the Board of Directors (BOD). The summary report shall contain an assessment of the operation and effectiveness of the Complaint procedure and shall recommend any changes that may be considered desirable. The complaints shall be completed within three months from the received date.

The complaints against the employees irrespective of grades shall be submitted to the Chief Internal Auditor Head Office.

7.0 Submission of Complaints

7.1 Complaints may be forwarded to the

Chief Internal Auditor
Internal Audit Department
24th Floor, Head Office
"BOC Square"
No. 1 Bank of Ceylon, Mawatha, Colombo 1, Sri Lanka
Tel: 0112445795 Fax: 0112445795 Email: cia@boc.lk

8.0 Reporting to Reserve Bank of India (RBI)

In case the complainant wishes to report to RBI, the envelope shall be addressed to

The Chief General Manager
Reserve Bank of India
Central Fraud Monitoring Cell
Department of Banking Supervision
No 10/3/8, Nruputhunga Road
P.B. No 5467
Bengaluru 560 001
Phone: +91 80 22244120
Fax : +91 80 22127754

The complainant shall ensure:

i. The compliant can be sent in a closed/ secured envelope.

ii. The envelope shall be super scribed "Complaint under Protected Disclosures Scheme for Banks".

iii. The complainant shall give his / her name and address in the beginning or end of the complaint or in an attached letter. In case of an employee making such complaint, details such as name, designation, department our bank name and place of posting etc. shall be furnished.

iv. Complaints can be made through e-mail also giving full details as specified above. For this purpose, a specific e-mail id has been created.

v. The complainant should ensure that the issue raised by him involves dishonest intention/moral angle. He should study all the relevant facts and understand their significance. He should also make an effort, if possible, to resolve the issue through internal channels in order to avoid making the complaint.

vi. The text of the complaint should be carefully drafted so as not to give any details or clue to complainant's identity. The details of the complaint should be specific and verifiable.

vii. In order to protect the identity of the complainant, RBI will not issue any acknowledgement of receipt of the complaint and the complainants are advised not to enter into any further correspondence with the RBI in their own interest. RBI assures that, subject to the facts of the case being verifiable, it would take necessary action, as provided under the scheme. If any further clarification is required, RBI will get in touch with the complainant.

viii. If the complaint is accompanied by particulars of the person making the complaint, the RBI shall take the following steps:

a) If necessary, it would ascertain from the complainant whether he was the person who made the complaint or not.

b) The identity of the complainant will not be revealed unless the complainant himself has made the details of the complaint either public or disclosed his identity to any other authority.

c) If the identity of the complainant is concealed, RBI shall make discreet inquiries to ascertain if there is any basis for proceeding further with the complaint.

d) Either as a result of the discreet enquiry, or on the basis of complaint itself without any inquiry, if RBI is of the opinion that the matter requires to be investigated further, RBI may consider calling for the comments / response from the Chairman / Chief Executive Officer of the concerned bank.

e) After obtaining the response of the concerned bank and / or on the basis of an independent scrutiny conducted / ordered by RBI, if RBI is of the opinion that the allegations are substantiated, the RBI shall recommend appropriate action to the concerned bank. These shall, inter alia, include the following:

- Appropriate action to be initiated against the concerned official.
- Appropriate administrative steps for recovery of the loss caused to the bank as a result of the corrupt act or mis-use of office, or any other offence covered by the Scheme.
- Recommend to the appropriate authority / agency for initiation of criminal proceedings, if warranted by the facts and circumstances of the cases.
- Recommend taking corrective measures to prevent recurrence of such events in future.
- Consider initiating any other action that it deems fit keeping in view the facts of the case.

ix. If any person is aggrieved by any action on the ground that he is victimized due to filing of the complaint or disclosure, he may file an application before the RBI seeking redressal in the matter. RBI shall take such action, as deemed fit. In case the complainant is an employee of the bank, RBI may give suitable directions to the concerned bank, preventing initiation of any adverse personnel action against the complainant.

x. Either on the basis of application of the complainant or on the basis of information gathered, if the RBI is of the opinion that either the complainant or the witnesses in the case need protection, the RBI shall issue appropriate directions to the concerned bank.

xi. The system evolved herein shall be in addition to the existing grievances redressal mechanism in place. However, secrecy of identity shall be observed, only if the complaint is received under the scheme.

xii. In case RBI finds that the complaint is motivated or vexatious, RBI shall be at liberty to take appropriate steps.

xiii. In the event of the identity of the informant being disclosed inspite of RBI's directions to the contrary, the RBI shall be authorized to initiate appropriate action as per extant regulations against the person or agency making such disclosure. RBI may also direct such person or agency to suitably compensate the complainant

9.0 Receipt, Retention and Handling of Complaints

9.1 Complaint Overseer shall maintain a log of all complaints and concerns, tracking their receipts, investigation and resolution. The complaint is considered as made when stamped received by the Complaint Overseer.

9.2 Upon receipts of the complaints, Complaint Overseer should immediately acknowledge the receipt and will then determine whether the complaint actually pertains to the scope above.

9.3 Matters will be investigated and all parties to complaint will be notified of the outcome within three months. The Complaint Overseer may extend any time limit specified above due to any emergency, medical, or legal mater.

10.0 Rights and Responsibilities of the Whistle Blower

The intent of this Policy is to bring genuine and serious issues to the fore and it is not intended for petty disclosures. Employees are expected to exercise their rights under this Policy in a judicious manner by adhering to the guidelines mentioned in the policy.

i. Avoid anonymity when raising a concern.

ii. Follow the procedures prescribed in the Policy for making a disclosure.

iii. Bring to early attention of the Bank any improper practice he/she become aware of delay in reporting may lead to loss of evidence and also financial loss for the organization.

iv. Co-operate with investigating authorities, maintain full confidentiality.

10.1 The Whistle Blower Protection

Any person can make a complaint under this policy to the complaint overseer either anonymously or by disclosing his/ her identity. No person who makes a compliant anonymously shall be disclosed provided that such person does so in good faith.

10.2 Confidentiality and Protection of Data

1. Confidentiality will be maintained to the fullest extent possible and consistent with the need to conduct an adequate review.
2. All proceedings under this procedure and any records will be confidential and retained at the Complaint Overseer's Office.

11.0 Administration of Policy

The Audit Committee of the Bank of Ceylon is the issuer and owner of this procedure. The procedure shall be subject to periodic review and revision by the Audit Committee as necessary or appropriate. The Audit Committee, in consultation with the Bank's Board of Directors shall have the authority to make any interpretation regarding the operation of this procedure. The Chennai Branch shall have mechanisms to make newly recruited employees of the bank aware of the existence of the Whistle Blower Policy in the bank and create a culture which encourages employees to report breaches or suspected breaches.

12.0 Review of Policy

The Policy will be reviewed by Chennai Branch on an annual basis in tune with the regulatory guidelines issued from time to time or internal requirements or as and when considered necessary.