



Whistle blower Policy

SELCO Foundation's (the Foundation) vision is to create a world where sustainable energy is a part of the approach to development and not an afterthought. To achieve this, the foundation develops innovative models and processes for decentralized energy solutions and scales it up through replication. In this endeavour the foundation engages itself with multiple stakeholders who help in achieving its vision.

1. OBJECTIVE

SELCO Foundation is committed to the principles of integrity, trust, transparency, ethical and lawful behaviour in all its activities. To maintain these principles, the foundation has formulated this Whistle Blower Policy (hereinafter called the *Policy*).

The broad objective of this policy is with respect to complaints, disclosures and allegations that are reported in good faith by a person (hereinafter called the whistle blower) who observes unethical practices, actual / suspected fraud, and/or violation of any law or legal obligations and the protection of the whistle-blower during the investigation and thereafter. The policy also aims to provide an environment that helps express these concerns without fear of reprisal

2. DEFINITIONS

Whistle blower" A person or entity reporting any actual or suspected unethical practices that they have observed. A Whistle blower could be employees (permanent, part-time, contract or outsourced), vendors, consultants, and employees of donors, collaborators and other partner organisations.

"Complaint /Allegation" (subject of investigation) The reporting of any actual / suspected unethical practices, fraud and/or violation of any law or legal obligations to the Designated person by a whistle blower, made in good faith would constitute a complaint/allegation.

"Designated Person" means an officer or a committee who is appointed to receive the complaint and conduct the investigation of the complaint received from the whistle blower and recommend suitable action. Designated Person shall report to Managing Trustee on complaints received and action taken under this policy

"Employee" means every employee of the Foundation (whether working in India or abroad). It will also include employees on contract and outsourced staff.

"Foundation" means, SELCO Foundation

“Good Faith” The whistle blower shall be deemed to be communicating in ‘good faith’ if there is a reasonable basis for reporting any unethical practices or any other wrongful conduct and is not acting in a malicious false or frivolous manner.

“Policy” Refers to the Whistle blower policy of the Foundation, unless otherwise specifically mentioned.

“Subject” would include a person or persons against or in relation to whom the complaint /allegations is made or evidence gathered during the course of an investigation under this Policy.

3. SCOPE

- This whistle blower policy applies to all employees including staff (permanent, contract and outsourced staff) and other stakeholders. Other stakeholders include vendors, consultants, and employees of donors, collaborators and other partner organisations. The policy applies to all locations where the Foundation operates.
- The policy specifies the process to raise a complaint, ensure timely response, initiate investigations and provide adequate protection as far as possible to persons who have raised these complaints.
- The policy is limited to matters related to the Foundation’s activities only. Private acts of individuals of the Foundation, not connected to the Foundation’s activities, will not fall within the ambit of the policy. The policy is in addition to the existing “Prevention of Sexual Harassment Policy” and does not replace the same. However, complaints regarding sexual harassment does not come under the ambit of this policy and is covered separately in the Foundation’s “Prevention of Sexual Harassment Policy”

4. REPORTING

- Any person who has a complaint or a concern related to the Foundation, that is in good faith, is encouraged to promptly report the same.
- All disclosures and complaints of unethical and improper practices are required to be made in writing. This ensures a clear understanding of the issues.
- Such disclosure of information including the name, address and contact details of the whistle blower may be sent to the designated person, Rachita Misra, Associate Director:

Address: Ms. Rachita Misra
SELCO FOUNDATION
690, 15th Cross, 2nd Phase J P Nagar,
Bangalore 560078

- The complaint can be made in writing through electronic mail to: rachita@selcofoundation.org who is responsible for the administration of the policy.
- Complaint reports can be made in person and orally as well. In case the complaint is given orally, the designated person will record the oral narration along with the date and time clearly mentioned in the recording. Further, the recording should be affirmed through the signatures of the whistle blower and that of the designated person.

- For any complaint related to the Trustees or the designated person for this policy, the Managing Trustee will be the designated person under this policy.
- It is necessary that all such complaints contain specific information and provide as much details as possible to facilitate the investigation. Evidence must also be provided to support the complaint wherever feasible to ensure that prima facie there is a case for investigation.
- Complaints can also be made anonymously, but the decision to act on anonymous complaints is up to the designated person who will take a decision whether to pursue the matter depending on the type of evidence provided. The decision of the designated person in such cases will be final and cannot be challenged at a later date. Anonymous complaints without supporting information will be summarily dismissed and will not be investigated.
- The foundation does not encourage individuals to use the whistle blower mechanism to pursue individual /personal complaints that can be resolved through the internal grievance redressal processes.

5. INVESTIGATION

The designated person will investigate these complaints with care and in a fair manner. The following steps and timelines must be followed:

- Acknowledgement of email/letter of the whistle blower by the designated person within 72 hours.
- Preliminary review of the complaint and its merits within 7 days from the acknowledgement. The same needs to be informed to the whistle blower within 3 days from the end of the preliminary review.
- Further review, investigation, enquiry, and formal completion of proceedings must be done within 90 days from the end of the preliminary review. This will conclude with the submission of a report.
- The designated person will provide the subject(s) named/involved in the complaint, an opportunity of being heard during the investigation.
- The designated person is required to conduct the investigation in a fair manner. Further, the designated person must document and record the entire investigation in a proper manner including the preparation of the final report.
- The whistle-blower has to be informed of the outcome of the investigation within 7 days of completion of the investigation. If the allegations are dismissed, the designated officer in consultation with the CEO of the Foundation (unless the complaint is against the CEO, in which case the Managing Trustee) can decide what to share regarding the findings of the investigation with the whistle-blower so that the whistle-blower is convinced that the complaint was investigated and found baseless.
- Subject (s) will also be informed of the outcomes of the investigation. This shall be made in writing within 7 days of the completion of the investigation.

- Suitable disciplinary/corrective action, if required, against the subject of the whistle-blower investigation, should be taken within 30 days from the report submission.
- Any appeal by the whistle blower/ subject of the whistle-blower investigation /other persons on outcome and subsequent action of the whistle-blower investigation should be filed within 15 working days after receiving information of the decision. The Managing Trustee will be the appellate authority
- All documentation and evidences associated with the investigation are considered as confidential information and access to the same will be restricted. All written complaints and other documents along with the results of investigation, shall be retained by the foundation for a minimum period of 7 years.

6. CONFIDENTIALITY & NO REPRISAL

- The Foundation will protect the identity of the whistle-blower to the greatest extent possible and ensure confidentiality. It may be noted that serious complaints sometimes may require thorough investigation by outside authorities, and it may not be possible to guarantee confidentiality in all cases.
- The Foundation or any other person shall not harass, terminate from work, intimidate, or retaliate in any manner against the whistle blower.
- The designated person can recommend that disciplinary action be taken on any such persons who obstructs the investigation, destroys evidence, threatens or retaliates against the whistle blower or the person investigating the matter.
- Utmost care will be taken to ensure that the name of the whistle-blower not be revealed to the subject of the whistle-blower investigation at any time during or after the investigation. Subjects have no right to ask for or be given information about the identity of the whistle blower.
- The investigation must also maintain confidentiality of the subject(s), unless disclosure of the same is required for the investigation purposes.

7. DISSEMINATION

A copy of this Whistle-blower Policy document will be circulated to all employees and will be posted on the Foundation's website.

The Foundation reserves the right to amend and/or supplement this Whistle-blower Policy at any time.