



CITY UNION BANK

"NARAYANA" ADMINISTRATIVE OFFICE
No.24-B , Gandhi Nagar, Kumbakonam
Phone : 04352402322 Fax: 0435 2431746

WHISTLE
BLOWER POLICY
(updated 2025)

INDEX

NO	DESCRIPTION	PAGE NO
1	INTRODUCTION & POLICY OBJECTIVE	1
2	COMPLAINTS	1
3	PROCEDURE FOR HANDLING OF COMPLAINTS	2
4	INVESTIGATION PROCEDURE	3
5	TIMELINES	3
6	PROTECTION / REDRESSAL	3
7	GRIEVANCE REDRESSAL POLICY	4
8	ALTERATION TO POLICY	4
9	REVIEW MECHANISM	4

Vigil Mechanism

1. Introduction & Policy Objective

1.1 The Bank is committed to the highest standards of ethics and integrity. The Bank encourages an open culture in all its dealings between staff, customers and all people with whom it comes into contact. The Board of Directors [Board] and the Senior management of the bank is committed to maintain high standards of honesty and integrity, and to promoting and maintaining corporate culture that adheres to these values.

1.2 The objective of the policy is to provide a safe and secure avenue for the employees, directors and other stake holders to raise concerns about violations of systems and procedure of the Bank, violation of law, questionable business practices or grave misconduct by employees that could lead to financial loss or reputation to the Bank. The other objective of the policy is also to provide adequate safeguards against victimisation of the complainant.

2. Complaints :

2.1 Complaints under this policy would cover areas of corruption, misuse of office, criminal offences, suspected/actual fraud, gross failure to comply with existing systems & procedures and regulatory requirements of RBI and other regulatory bodies. The offences that can be classified as Moral Turpitude shall also be governed by Vigil Mechanism.

2.2 The Designated Authority for handling Vigil Mechanism complaints shall be the Chief of Internal Vigilance(CIV). For complaints against the MD & CEO, CIV, Directors of the Board, the Chairman of the Audit Committee shall be the Designated Authority.

2.3 Complaints that shall be excluded from the scope of policy shall include

- a) that are vague or incoherent, relating to personal grievance including workplace related matters.
- b) that are related to customer service / grievances
- c) that are pseudonymous / anonymous
- d) that relate to matter's under sub-judice
- e) others that do not explicitly come within the ambit of the objectives of policy.

2.4 Complaints can be lodged by

- a) Employees of the Bank including contract employees and ex-employees.
- b) Directors of the Bank
- c) All stake holders including customers, Third Party Vendors, Consultants and others who have a relationship with the Bank.
- d) Other department/verticals of the Bank.

2.5 The Complaints can be made

- a) by Employees through Intranet (2.0 or updated version) under Confidential Domain.
- b) by Email to dedicated email id wb@cityunionbank.in
- c) in writing by post/courier addressed to "The Chief of Internal Vigilance, Administrative Office, Gandhi Nagar, Kumbakonam 612001" duly super scribing the envelope as 'Complaint under City Union Bank-Vigil Mechanism '.
- d) in writing for Complaints against MD & CEO, CIV, Director's of the Bank should be addressed to the "The Chairman, Audit Committee of the Board (ACB), Administrative Office, Gandhi Nagar, Kumbakonam 612001" duly super scribing the envelope as 'Complaint under City Union Bank-Vigil Mechanism' or through email to cubacb@cityunionbank.in

3. PROCEDURE FOR HANDLING OF COMPLAINTS :

3.1 On receiving the complaint, if the Bank finds it necessary, then CIV would ascertain from the complainant whether he/she was the person who made the complaint or not.

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

3.3 If the identity of the complainant is concealed, the Bank shall make discreet enquiries to ascertain the veracity before proceeding further with the complaint.

3.4 Either as a result of the discreet enquiries, or on the basis of the complaint itself without any inquiry, if the Bank is of the opinion that the matter requires to be investigated, the Bank may proceed with detailed investigation.

3.5 If after detailed investigation, if the Bank is of the opinion that the complaint reveals fraud perpetrated on the Bank, suitable action will be initiated as per the policy on Fraud Risk Management of the Bank in addition to the following:

- i. Appropriate action will be initiated against the concerned erring employee.
- ii. Appropriate administrative steps for recovery of loss (if any) caused to the Bank as a result of the corrupt act/mis-use of office/any offence covered by the Policy
- iii. Take corrective measures to prevent recurrence of such events in future.
- iv. Consider initiating any action that it deems fit keeping in view the facts of the case.

- v. Recommend to the appropriate authority/agency for initiation of criminal proceedings (if warranted) by the facts and circumstances of the case.

3.6 All complaints not explicitly handled by vigilance department shall be redirected to the respective departments for taking it to a logical conclusion and reporting thereof to respective overseeing authorities / Board.

4. INVESTIGATION PROCEDURE

4.1 The Designated Authority(CIV) on receiving a complaint under the policy will cause an investigation into complaint wherever so required, and shall decide upon the time frame depending upon the merits of the individual case and circumstances.

NOTE: Where the complaint is made to the Chairman of the Audit Committee of the Board, investigation/ further action shall be as per the direction of Chairman of ACB.

4.2 The investigation report shall be submitted to the CIV for further course of action on the findings.

4.3 All complaints with findings of fraudulent overtones will be placed before the Management Committee for Monitoring of Frauds (MCMF) for required action as per policy on Fraud Risk Management.

4.4 In all other cases, depending upon the findings in the investigation, the CIV shall either order for closure of the complaint/recommend to HR for necessary preventive/punitive action against erring staff as deemed necessary.

4.5 The CIV shall submit a report on Vigil Mechanism complaints to the SCBMF in respect of all Fraud cases and to the Audit Committee of the Board for other than fraud cases expeditiously upon culmination of the process of examination of the complaint.

5. TIMELINES:

5.1 All complaints received under the Vigil Mechanism shall be taken to its logical conclusion within 4 months from the date of receipt of the complaint.

5.2 If the complaint is not made within the ambit of the Vigil Mechanism, the same shall be rejected by CIV within 7 working days from the date of the receipt of the complaint.

6. PROTECTION /REDRESSAL

6.1 If any employee is aggrieved by any action on the ground that he/she is victimized due to filing of the complaint or disclosure, he/she may file an application before the MD & CEO of the Bank seeking redressal in the matter. The MD & CEO of the Bank shall upon examination decide upon the grievance as deemed fit.

6.2 Either on the basis of the application of the complainant or on the basis of information, if the Bank is of the opinion that the complainant is in need of protection, then the Bank shall take further course to protect the complainant.

6.3 If the Bank observes that the complainant has made a motivated/vexatious complaint under the policy then the Bank will give the complainant an opportunity of hearing. If the Bank thereafter concludes that the complainant had made a motivated/vexatious complaint, then suitable action may be taken against the complainant as per applicable rules of the Bank / law in force.

7. Grievance Redressal Policy :

7.1 The Bank has a separate grievance redressal policy. This policy shall not handle complaints dealt with by the grievance redressal policy.

8. ALTERATION TO POLICY

8.1 Alteration/ amendments /modification of this policy, as per extant regulatory / statutory requirements can be made with the approval of MD & CEO and should be placed to the Board during the subsequent review of the policy.

-X-X-X-