Bharat Rural Livelihoods Foundation (BRLF)
Whistle Blower Policy

Policy Title: Whistleblower Policy	**Policy Number: HR/BRLF/03**
Effective Date: January – March 2026	**Review Date: December 2025**
Approved By: Board of Directors	**Policy Owner: Human Resources Department**

1. Purpose

The purpose of this policy is to provide a safe, secure, and confidential mechanism for all employees, consultants, partners, vendors, and other stakeholders of Bharat Rural Livelihoods Foundation (BRLF) to report actual or suspected wrongdoing, unethical behaviour, or violations of BRLF's Code of Conduct without fear of retaliation or victimization. This policy reinforces BRLF's commitment to integrity, transparency, and accountability in all its operations. It also aims to:

- Encourage the reporting of wrongdoing;
- Outline how BRLF will investigate and resolve protected disclosures made under this policy;
- Provide clear guidance to employees on unacceptable practices within BRLF;
- Ensure a safe environment for whistleblowers to raise concerns in good faith; and
- Protect employees who have a reasonable suspicion that malpractice has occurred, is occurring, or is likely to occur, assuring them that they will not face any adverse consequences for doing so.

2. Scope

This policy applies to all BRLF employees (regular, contractual, or probationary), consultants, interns, fellows, partner organizations, vendors, and service providers associated with BRLF. It is applicable across all offices and programs supported by BRLF.

3. Definitions

• **Whistleblower:** Any person who reports a concern in good faith regarding wrongdoing, unethical behavior, or violations under this policy.

• **Protected Disclosure**: A bona fide communication made in good faith that discloses information about suspected misconduct or violations.

• **Ombudsperson:** An individual appointed by the Chief Executive Officer to receive and investigate disclosures under this policy.

• **Misconduct**: Any act that violates BRLF's Code of Conduct, ethical principles, or legal obligations.

• **External Stakeholders**: Vendors, consultants, and partner organizations engaged through formal agreements or collaborations with BRLF.

4. Policy Statement

BRLF is committed to maintaining the highest ethical standards and expects all employees and partners to adhere to the organization's values and code of conduct. This policy enables individuals to raise concerns about actual or suspected unethical behavior or misconduct and ensures that such concerns are investigated impartially, confidentially, and without fear of reprisal.

Serious misconduct includes wrongdoing, corruption, bribery or theft. This may include, but is not limited to:

- Financial and procedural malpractice including those relating to mismanagement; misappropriation of funds; actual or suspected fraud or abuse of authority.
- Falsification of organizational records for personal gain or gain for others on the part of Staff, partners and members of the Governing Body.
- Miscarriage of justice
- A criminal offence, including theft, fraud or corruption.
- A failure to comply with a legal obligation, (including but not limited to those under the financial regulations).
- Accepting gifts which are intended to influence decision making
- The endangerment of an individual's health and safety, and well-being: this would include staff members, employees, vendors, volunteers or visitors to BRLF.
- Damage to the environment or conduct which conflicts with BRLF's interests.
- Deliberate disregard or serious breach of BRLF's principles and values, including bullying and
- harassment, and discrimination.
- Deliberate concealment of information to any of the above.
- Being aware of a misconduct or misuse and not reporting it

5. Procedures / Process

Reports or Complaints should be submitted to the Ombudsperson at whistleblower@brlf.in (confidential email accessible only by the Ombudsperson). In case the concern involves the Ombudsperson, reports/ complaints may be made directly to the Chief Executive Officer of BRLF at ceo@brlf.in.

The whistleblower should provide details including their name, contact information, description of the concern, relevant facts and evidence, and details of individuals involved, if known.

Anonymous Complaints
BRLF recognizes that in certain situations, individuals may wish to report concerns anonymously. Anonymous complaints will be accepted through the designated whistleblower email or through hard copy of the complaint addressed to the Ombudsperson and the Chief Executive Officer of BRLF.

While such complaints will be reviewed to the extent possible based on the information available, the absence of contact details may limit the ability to verify facts, seek clarifications, or provide feedback to the complainant. Nevertheless, all anonymous disclosures containing sufficient information to warrant an inquiry will be investigated with due seriousness and confidentiality.

6. Roles and Responsibilities

• **Ombudsperson:** To receive, review, and investigate all whistleblower disclosures and ensure confidentiality.

• **HR Department:** To support investigations, maintain documentation, and ensure training and communication. The HR Department is responsible for providing workshops, coaching, advice and guidance to the supervisors on the implementation and use of the policy.

• **Whistleblower Review Committee (WRC):** To conduct impartial investigations as required, ensuring natural justice and fairness.

• **Employees and Partners**: To report any observed or suspected wrongdoing promptly and in good faith.

7. Confidentiality and Protection

BRLF strictly prohibits retaliation, discrimination, or victimization of anyone who reports a concern in good faith. The identity of the whistleblower will be kept confidential unless disclosure is required by law or necessary for a fair investigation. Individuals assisting in an investigation will receive the same protection.

8. Records and Reporting

All records of disclosures, investigations, and outcomes shall be securely maintained by the HR Department for a minimum of five years. The annual summary report will be presented to the President.

9. Review and Amendment

This policy will be reviewed annually by the HR Department and approved by the EC to ensure continued relevance, compliance with legal standards, and alignment with BRLF's organizational values. **Annual refresher sessions** will be held to reinforce awareness and understanding. All BRLF staff and partners will be informed whenever this policy is revised.

Awareness for External Stakeholders

BRLF will ensure that all external stakeholders, including vendors, consultants, and the partner organizations, are informed about the Whistleblower Policy through official communication channels such as onboarding documentation, contracts, and the BRLF website.
The policy will also be made accessible to them via periodic updates and awareness sessions coordinated by the HR Department.

Whistleblower Reporting and Investigation Procedure

- **Step 1: Identifying and Reporting Misconduct -** Any employee, consultant, or CSO partner who becomes aware of potential or actual misconduct should report it as soon as possible in good faith, supported by factual details or documentation where available. Reports may be made via email to whistleblower@brlf.in or directly to the Ombudsperson.
- **Step 2: Acknowledgment and Preliminary Review -** The Ombudsperson will acknowledge receipt within two working days and complete a preliminary assessment within five working days to determine whether the matter qualifies under this policy.
- **Step 3: Formation of Whistleblower Review Committee (WRC) -** If investigation is warranted, the Ombudsperson will constitute a WRC comprising in consultation with the CEO the following:
  - Ombudsperson (Chair)
  - Head - Human Resources and Organizational Development
  - One Senior Management Representative (not connected to the case)
  - And/or one External Independent Member
- **Step 4: Investigation -** The WRC will conduct an impartial investigation within 30 working days, interviewing relevant individuals and reviewing evidence. Both the complainant and the respondent will be allowed to present their accounts, ensuring fairness and due process.
- **Step 5: Reporting and Decision** - A written report will be submitted by the WRC to the Chief Executive Officer with findings and recommendations for corrective or disciplinary action.
- **Step 6: Appeal and Closure -** If dissatisfied with the outcome, the whistleblower may appeal to the Chief Executive Officer within 15 working days. The Chief Executive Officer's decision shall be final.
- **Step 7: Recordkeeping and Reporting -** All investigation records shall be maintained securely for a minimum of five years, and an annual summary will be submitted to the Chief Executive Officer by the Ombudsperson. An annual summary report, excluding personal identifiers, will be presented to the President.
- **Step 8: Confidentiality and Protection** - All proceedings will remain confidential, and the identity of the whistleblower and witnesses will be protected to the extent possible. Retaliation will result in disciplinary action.
  The confidentiality of the reports will be kept to the extent possible, consistent with the need to conduct an adequate investigation. However, in

certain cases, this may not be possible, particularly in instances warranting police investigation or when a disciplinary hearing is held, where individuals will need to make a statement.

- **Step 9: False and Malicious Complaints** - Any complaint found to be deliberately false, frivolous, or made with malicious intent will attract appropriate disciplinary action.
  However, complaints made in **good faith** — even if not substantiated upon investigation — will **not** result in any penalty or adverse action against the whistleblower.
- **Awareness and Communication** - This policy and the procedure will be included in induction and refresher trainings, shared with partners, and made available on the BRLF intranet and website.

DECLARATION

I have fully read and understood the BRLF Whistle-Blower Policy and hereby agree to abide by all its provisions both in letter and spirit. I also abide by the terms and conditions of employment as outlined in the BRLF HR Policy Manual currently in force.

Signature: _____

Name : _____

Date : _____