



PEOPLE'S PARTICIPATION

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-:WHISTLEBLOWER POLICY:-

(Acknowledgement: SAE INTERNATIONAL)

Introduction:

The Board's Whistleblower Policy governs the reporting of good-faith concerns about the legality or propriety of **People's Participation** actions or plans.

Reporting of Concerns or Complaints:

All Board members and volunteers are expected to comply with the Board's Code of Ethical Conduct and applicable laws, and to report violations or suspected violations by Board members, volunteers or staff in accordance with this policy.

Confidentiality:

All communications under this policy shall be treated in a confidential manner, except to the extent necessary:

1. To conduct a complete and fair investigation, or
2. For review of operations by the Board, Financial Audit Committee, independent public accountants and/or legal counsel.

Retaliation:

Negative or adverse action is not to be taken against any Board member, volunteer or staff for making a good-faith report of a possible violation of its Code of Ethical Conduct or applicable laws, even if the report is mistaken, or against the Board, Financial Audit Committee, independent public accountants, and/or legal counsel who assist in the investigation of a reported violation. Retaliation in any form shall not be tolerated. Any act of alleged retaliation should be reported immediately and shall be promptly investigated. A Board member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including removal from the Board. This policy is intended to encourage and enable individuals to raise serious concerns within **People's Participation** prior to seeking resolution outside the organization.

How to Report Concerns or Complaints:

Board members, volunteers and staff may communicate suspected violations of the Code of Ethical Conduct, applicable laws or other wrongdoing or alleged retaliation by contacting the President & Chair of the Board, Treasurer and/or Secretary. It is not necessary that a Board member, volunteer or staff give

their name or position in any notification. While the reporter of the violation need not identify himself/herself, for an effective investigation to be conducted the reporter should provide **People's Participation** with as much detailed information as possible concerning the alleged violation, including the substance of the incident, where and when the incident occurred, and the names and titles of the individuals involved.

Illustrative Types of Concerns:

The following is a non-exhaustive list of the kinds of incidents and improprieties that should be reported:

1. Supplying false or misleading information on **People's Participation's** financial, legal or other public documents, including Internal Revenue Form 990.
2. Providing false information to or withholding material information from **People's Participation's** Board, auditors, legal counsel or management.
3. Destroying, altering, mutilating, concealing, and covering up, falsifying or making a false entry in any record that may be connected to an official matter or proceeding, in violation of federal or state law, regulations or **People's Participation** policies.
4. Altering, destroying, or concealing a document or attempting to do so, with the intent to impair the document's availability for use in an official matter or proceeding or otherwise obstructing, influencing or impeding any official matter or proceeding, in violation of federal or state law, regulations or **People's Participation** policies.
5. Embezzlement, self-dealing, private inurement (*i.e.*, **People's Participation** earnings inuring to the benefit of a Board member, volunteer, or staff) and private benefit (*i.e.*, **People's Participation** assets being used by anyone in the organization for personal gain or benefit).
6. Paying for services or goods that are not rendered or delivered.
7. Using remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive, including sexual flirtations, unwelcome physical or verbal advances, sexual propositions, verbal abuse of a sexual nature, the display of sexually suggestive objects, cartoons, or pictures, and physical contact of a sexual or particularly personal nature.
8. Using epithets, slurs, negative stereotyping, and/or threatening, intimidating or hostile acts that relate to race, color, religion, gender, sexual orientation, national origin, age, disability or other legally protected status.
9. Circulating or posting written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, sexual orientation, nationality, age, disability or other legally protected status.
10. Discriminating against an individual due to a person's race, color, religion, gender, sexual orientation, national origin, age, physical or mental impairment, veteran status or other legally-protected status.
11. Violating the Code of Ethical Conduct and/or the Conflict of Interest Policy.
12. Facilitating or concealing any of the above or similar actions.

Questions:

For questions regarding this policy, please contact the Secretary (peoplesparticipation@gmail.com)

This policy has been reviewed and is recommended for approval by:

Dipankar Mitra

Secretary - 'People's Participation'

This policy has been viewed and is approved by:

Samita Goswami

President- 'People's Participation'