ALUMNI ASSOCIATION of INDIAN INSTITUTE OF FOREST MANAGEMENT

WHISTLEBLOWER POLICY



Adopted 15/Nov/2021

The Alumni Association of the Indian Institute of Forest Management [the "Association"] requires its office bearers [members of the Board of Governors and members of Committees appointed for Management of the Association] employees and volunteers to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. Office bearers, employees and volunteers of the Association are expected to act with honesty and integrity at all times in fulfilling their responsibilities, including complying with applicable laws, regulations and Association policy.

1. REPORTING RESPONSIBILITY

This Whistleblower Policy is intended to encourage and enable office bearers, volunteers, employees and certain others to raise any serious ethical or legal concerns regarding Association activities in a manner such that the Association can address any allegations of inappropriate personal conduct. It is the responsibility of all office bearers, employees, volunteers, and clients to report concerns about suspected violations of law, regulation, or internal policies that govern the Association's operations.

The Whistle Blower Policy is mandated by Article 11.25 of the Association's Memorandum of Association.

2. NO RETALIATION

It is contrary to the values of the Association for anyone to retaliate against any office bearer, employees and volunteers who in good faith reports a suspected breach of ethics, violation of law or regulation, which would include complaints of illegal discrimination, suspected fraud, or violation of internal policies governing the operations of the Association. An office bearer or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from the Governing Board or suspension of membership of the Association.

3. REPORTING PROCEDURE

The Association has an open door policy that encourages office bearers and employees to share their questions, concerns, suggestions or complaints with their supervisor. Similarly, for financial clients or volunteers, your designated point of contact will typically be in the best position to resolve most conflicts or concerns relating to matters within the scope of day to day Association operations. These lines of communication should be the first option to resolve such matters, including those human resource issues related to performance review, compensation, promotion opportunity, the scope of job responsibilities, and the like.



Archano Shamo



Should a concern relate to a possible violation of law or serious breach of ethics or Association policy, and an individual is not comfortable speaking with their supervisor or other Association point of contact, or is not satisfied with their supervisor or point of contact's response once a concern is raised, he or she is encouraged to report the concern to the independent party engaged by the Association, who will either speak to the individual for appropriate follow up and resolution. Matters properly reported through the Association's engaged independent service will be communicated simultaneously to both the Secretary of the Governing Board and a member of the Association's senior staff for follow up and resolution.

- 3.1 The Association will set up a standing three member Whistle Blower Committee [WBC]. The members of the WBC will be Life Members of the Association and be responsible for [i] screening the complaint/ disclosure, [ii] appointing investigators and [iii] monitoring progress of the investigation. One member of the WBC shall be the Coordinator of the committee. The term of the WBC shall be three years.
- 3.2 The complaint/ disclosure shall be in writing and needs to be submitted online on the Association's Official Website: www.iifmalumni.com. To submit a complaint, the complainant should navigate to "Contact Us- Complaints' (direct link: https://www.iifmalumni.com/ index. php/complaints) fill out the complaints form and submit. The complaint/ disclosure should be typed in English or Hindi and should provide a clear understanding of the improper activity involved or issue/ concern raised. The reporting should be factual and not speculative in nature. It must contain as much relevant information as possible to allow for review and proper assessment. It is necessary that the complaints provides his/ her identity and contact details. Upon submission, the website will dispatch the complaint/ disclosure immediately to the three members of the WBC.
- 3.3 The Coordinator of the WBC shall ensure that a meeting of the WBC is called within three days of receiving the complaint. The WBC shall
 - 3.3.1 Screen and weed out frivolous complaints/ disclosures. If the complaint is found frivolous, the Coordinator WBC will inform the complainant and the Secretary, Governing Board within ten days of receiving the complaint.
 - 3.3.2 For the rest, the WBC shall ensure that investigator[s] is nominated [and confirmations received] within 15 days of receipt of a complaint/ disclosure. A minimum of one and a maximum of three investigators may be appointed for a case based on the wisdom of the WBC. The decision taken by WBC to conduct an investigation is by itself not to be construed as an accusation and is to be treated as a neutral fact finding process.
- 3.4 The Association Secretariat shall make arrangements for travel and stay for the investigators at Bhopal if the investigator[s] so desire. No other reimbursements will be due to the investigators.
- 3.5 The identity of the Subject[s] [office bearer, employee, volunteer or client] against or in relation to whom a complaint/ disclosure has been made or evidence gathered during the course of an investigation] and the Whistle Blower will be kept confidential.

Hichano Shamo

- 3.6 Unless there are compelling reasons not to do so, subject[s] will normally be informed of the allegations at the commencement of a formal investigation and will be given opportunities for providing their inputs during the investigation.
- 3.7 Suspected office bearers, employees and volunteers will not be entitled to any form of representations, including legal representation, during investigation.
- 3.8 Investigator[s] are required to conduct a process towards fact finding and analysis. Investigator[s] shall derive their authority from Competent Authority ['Competent Authority' means the Governing Board of the Association] when acting within the course and scope of their investigation. The Investigator[s] shall submit her / his / their report to the Competent Authority through the WBC.
- 3.9 Post 90 days of the initiation of the investigation the Investigator[s] shall submit a monthly progress report to the Competent Authority through the WBC.
- 3.10 The Whistle Blower is not required or expected to conduct any investigation on her/ his own. The Whistle Blower may also be associated with the investigations, if the case so warrants. However, s/he shall not have a right to participate.
- 3.11 The report of the investigators have to be tabled at the Annual General meeting of the Association.

4. ACTION

If the Competent Authority is of the opinion that the investigation discloses the existence of improper activity, which is an offence punishable in law, the Competent Authority may direct the concerned authority to take disciplinary action under applicable statutory provisions for appropriate action.

The Competent Authority shall take such other remedial action as deemed fit to remedy the improper activity mentioned in the disclosure and /or to prevent the re-occurrence of such improper activity.

If the investigation discloses that no further action on the complaint/ disclosure is warranted, the report shall be appropriately filed in the office of the Association.

5. ACTING IN GOOD FAITH

Anyone filing a complaint/ disclosure concerning a violation or suspected violation must be acting in good faith, which includes having reasonable grounds for believing the information disclosed is true and that the information indicates a potentially serious breach of conduct. Any allegations that prove not to be substantiated and which prove to have been made maliciously or known to be false will be viewed as a serious disciplinary and/or legal offense.

6. CONFIDENTIALITY

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. To the extent any individual





reporting a suspected violation is comfortable providing the means to be contacted for confidential follow up, additional information may be sought to appropriately address and resolve the allegation and/ or concerns. While anonymous concerns may be reported, many matters deserving investigation may be difficult to evaluate as to their substance or credibility absent the ability to engage in follow up communication with the reporting individual.

7. ANNUAL AFFIRMATION

The Association shall annually affirm that it has not denied any office bearer, employee, volunteer or client access to the WBC and that it has provided protection to the Whistle Blower from adverse action. The affirmation shall form part of THE Associations Good Governance. The report of the WBC is to be attached to the Annual Report of the Association.

8. AMENDMENT

This policy can be changed or modified at any time jointly by the Governing Board of the Association. The amended policy shall be put up on the website of the Association and will be in force once it is uploaded on the website. Other than the Governing Board, an alum or a group of alumni can make a request to the Board in writing to amend the Whistle Blower Policy by changing, deleting or adding from/ to the policy. The Board will use its wisdom and take a decision on the same. Any amendment to the Policy will need a simple majority of the General Body in an Annual General Body Meeting or Extraordinary General Body Meeting.

9. ADOPTION & NOTIFICATION

The Governing Board of the Alumni has adopted and notified this Whistle Blower Policy on 15th of November 2021 and will come into force from 1st December 2021.

Ashish Mishra PRESIDENT

Bijoy Prasad Ratho VICE PRESIDENT

Praveen Kumar Khedale Apoorva Singh
JOINT SECRETARY TREASURER

Poornima Mishra Bishnu C Parida

MEMBER MEMBER

Sejal Agarwal MEMBER

Archana Sharma

SECRETARY

Ghazala Ali Khan MEMBER

Dated: 15th November 2021