SHREE KADI NAGARIK SAHAKARI BANK LTD.

Resolution No: 13 **Date: 29.08.2026**

WHISTLE BLOWER POLICY

Preamble:

The purpose of whistle blower policy of the Bank is to encourage its employees, executives, and customers (both existing and prospective) to report unethical behaviours, malpractices, wrongful conduct and fraud, violation of the Bank's policies or statutory laws by any employee / executives of the Bank without any fear.

Scope of the Policy:

The policy shall cover all the staff members of the Branches / Head Office of the Bank.

Who can blow the Whistle?

Any employee of the Bank who has definite and verifiable information about wrong doing / unfair practices carried out in the Bank and wishes to make a protected disclosure can blow the whistle.

Matters to be reported:

The policy is not intended to question financial or business decisions taken by the bank that are not reportable matters. It should not be used as a means to reconsider any matters which have already been addressed pursuant to disciplinary or other internal procedures of the bank. Further, this Policy is not intended to cover career related or other personal grievances.

"Reportable Matters" generally include unethical behaviours, malpractices, wrongful conduct, fraud and violation of the Bank's policies or statutory laws by any employee / director etc.

Name of Dealing Authority:

Dealing Authority:

Mr. Pankaj V. Mishra, Chief Compliance Officer

Phone No # 02764 - 263035, Mobile # 84600 63230

Notwithstanding above, any reporting person may approach Dealing Authority directly. If any members of the Dealing Authority / Committee member have a conflict of interest in a given case, they should exclude themselves and the other committee members would deal in the matter. Any person can also use the drop box or complaint box available in the branches for submitting compliant under whistle blower policy. Complainant does not require to disclose the name in the complaint.

Protected Disclosures:

Protected Disclosure means a complaint raised in good faith that discloses information that may have evidence of unethical conduct or improper activity. But it should be factual and not speculative in nature.

Procedure for handling protected disclosures is as under:

- Protected Disclosure should be reported through any of the following modes by the complainant to the Dealing Authority; (a) by letter in a closed / sealed envelope addressed to the Dealing authority, Corporate Office, Arts & Commerce College Ground, Kadi -Thol Road, Kadi - 384440, Dist-Mehsana (b) by way of an email addressed to whistleblower@kadi.bank.in
- The complaint should be backed by evidences. The dealing authority shall dismiss the matter in case of non-availability of sufficient documents.

- Any complaint received needs to be opened only by Dealing Authority in confidence. As soon as dealing authority receives complaint under whistle blower, he / she has to ensure clear understating of issue raised.
- The Protected Disclosure should be informed to or submitted in a closed and secured envelope and should be superscribed as "Protected disclosure under the whistle blower policy". If the written complaint is not superscribed and not closed as mentioned above, it will not be possible to protect the identity of the complainant and the protected disclosure will be dealt with as if a normal complaint. The complainants are advised not to write the name / address of the complainant either on the envelope or to enter into any further correspondence with the dealing authority, unless called for.
- In case dealing authority received "Protected Disclosure" with name and address of complainant, then dealing authority shall detach the identity of the whistle blower and the dummy complaint will be given a specific number with which the original complaint can be traced back.
- The original complaint would be kept in a safe under the custody of the dealing authority and dealing authority should ensure to protect the identity of the complainant.
- The dealing authority shall initiate inquiry by him / her self on the basis of complaint received.
- If such initial inquiry indicates that the concern has no basis or it is not a matter to be reported as per the Policy, it may be dismissed at this stage and the decision will be documented.
- Where the initial inquiries indicate that further investigation is necessary, this will be carried out. During the investigation, the authority may take the help of an expert who will assist in the investigation and in the analysis of the results.
- The investigation would be conducted in a fair manner, as a neutral fact-finding process and without presumption of guilt. Investigation report will be put up to the Committee within practicably possible time. Written findings will be recorded and the record will include -
  - Whether the same Protected Disclosure was raised previously by anyone, and if so, the outcome thereof;
  - Details of actions taken by dealing authority for processing the complaint.
  - Findings of the Committee;
  - The recommendations of the Committee / other action(s).
- The Committee shall address all concerns or complaints regarding issues, which are placed before it, and ensure resolution of the same.
- Committee members will prepare report and submit to CEO / Chairman along with their recommendations for decision.
- All employees have a duty to cooperate in the investigation of complaints reported as mentioned hereinabove. Employees shall be subject to strict disciplinary action including immediate dismissal, if they fail to cooperate in an investigation, or deliberately provide false information during an investigation.

Non-Retaliation:

There will not be any retaliation against any employee for reporting in good faith any inquiry or concern. Any employee who retaliates against a Whistleblower will be subject to an appropriate action, including immediate termination of employment / relationship with the Bank.

However, the policy is not a route for taking up a personal grievance.

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General:

1. Any or all provisions of the Whistle Blower Policy will be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by Shree Kadi Nagarik Sahakari Bank Ltd., Government / regulatory bodies, from time to time.
2. The Bank reserves the right to modify, cancel, add, or amend any provisions of this Policy.
3. It would be mandatory for all employees to inform to the management any unethical or irregular practices are happening / going on in the branch / office / bank.
4. If at the later stage come to the notice of bank that employee/s was / were aware of the unethical or irregular practice, appropriate action will be initiated against non-blower employee/s.

Members of the committee:

- Head of Investment Department
- Head of Audit Department
- Head of IT Department
- Head of Credit Department

The quorum of the meeting would be minimum two members. Names and Designations mentioned above are subject to change due to non-availability OR any changes.

Above policy is broad in nature and Bank makes any change or amend the policy at any time as per administrative need of the Bank.

For, **SHREE KADI NAGARIK SAHAKARI BANK LTD.**

Chief Executive Officer **Chairman**