MILES2SMILE FOUNDATION POLICY DOCUMENT UPDATED 2023

WHISTLE BLOWER POLICY

Whistleblower Policy

1. <u>What is Whistleblowing?</u>

Whistleblowing means when an employee makes fraud, corruption, and wrongdoing in an organization known to the public. A whistleblower in India is a current or ex-employee who exposes information regarding what is believed to be fraud, corruption or deviation from the company rules and company laws. The employee discloses what they believe to be the unethical or illegal behaviour of higher management.

The whistleblower policy is aimed to safeguard the interest of the general public. Employees who reveal fraud, corruption or mismanagement to the senior management are called internal whistleblowers. Employees who report fraud or corruption to the media, public or law authorities are external whistleblowers. Indian whistleblowers are protected under the Whistleblower Protection Act India.

2. <u>Reporting</u>

Miles2Smile Foundation staunchly supports and believes that any organization cannot work without complete transparency and accountability. We encourage current and ex-workers to report any activity that they find illegal or corrupt to their immediate supervisor under our Whistleblower policy.

3. <u>Reporting Procedures</u>

All workers, current or ex, permanent or temporary, can report any activity which they find illegal, fraud or not in compliance to the rules of the organization. Miles2Smile Foundation has an open door policy wherein they can directly make a complaint to their immediate senior. If they find their action inadequate, the complaint would go to the head of the organization and suitable action would be taken.

4. Confidentiality and No Retaliation

- **4.1** Whistleblower policy under Miles2Smile Foundation has been constituted keeping two principles in mind.
- **4.2** First, confidentiality of the whistleblower shall be maintained unless it is absolutely necessary to disclose their identity for thorough investigation.
- **4.3** Second, it is in best interest for everyone involved to practice the policy of no retaliation if a complaint has been found against them. A volunteer who retaliates against someone who has reported a violation in good faith is subject to being declared as persona non grata. If any elected members of the Board of Directors retaliate they are subject to being recalled from their positions of responsibilities.

5. Who will Handle all Documentation of the Incident?

A dedicated person who will be appointed on a case to case basis to avoid any conflict of interest will handle all the documentations.

5. False Complaints

If it is found after investigation that the complaint made was false, the complainant would be asked to resign with immediate effect and tender a public apology for the same. Failing to comply will invite legal procedure including a defamation suit.

About the organization:

Miles2Smile was established three years back as a not-for-profit organization, based in Delhi. The organization works primarily in relief activities and brings smiles to the faces of victims looming over penury and distress. Livelihood creation, healthcare and educational empowerment are also some core areas of work by the organization. In the past two years, the organization has made commendable service in delivering solace to the people languishing in the heap of despair. The organization is on an assiduous mission to revive happiness to the people ripped after communal tensions.





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