



ANTI FRAUD & WHISTLEBLOWING POLICY

	Name	Designation & Function	
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FOUNDATION TO EDUCATE GIRLS GLOBALLY

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Anti Fraud & Whistleblower Policy:

1. Preamble :

At FEGG, our core values of Integrity & Excellence are the foundation for all actions and for the decisions we take. They set standards for the organization and for employee conduct. The reputation of Educate Girls is built upon the principles of fair dealing and ethical conduct of our associates. Our reputation for integrity and excellence requires a scrupulous regard for the highest standards of conduct and personal integrity.

2. Objective / Purpose of the Policy :

This Anti-Fraud & Whistleblower Policy outlines the principles to which the organization is committed towards in relation to preventing, reporting and managing fraud and corruption. This Anti-Fraud & Whistleblower policy reinforces the approach to ensure dealings and conduct are in line with the core values of the organization and by setting out the ways in which associates or other associates can voice (Whistleblow) their concerns about suspected fraud or corruption. It also outlines how the associates can report complaints & how the organization will deal with such complaints.

3. Applicability :

This policy shall apply to all associates of FEGG, whether part-time or full-time, including consultants & volunteers.

The policy is also applicable to any contractor or subcontractor engaged to perform work or supply a service; an outworker; any former employee; any intern or trainee; any person who is or was associated to the organization; and any candidate for employment only where the information of a suspected improper practice has been acquired during the recruitment process or at pre-contractual negotiation stage.

4. Controls, prevention & policy implementation :

FEGG is committed to developing an anti-fraud culture and actively seeks to deter and prevent fraud and corruption by ensuring that risks are identified and managed effectively. The organization will not accept any level of fraud, bribery or corruption and will investigate the suspected cases thoroughly. Staff involved in an impropriety of any kind will be subject to the disciplinary procedures and legal action will be taken where appropriate.

The organization will take necessary steps to prevent the possibility of fraud. Every department will establish controls and procedures designed to eliminate the likelihood of fraud. The organization will also create required cognizance in associates for the code of conduct.

To ensure that this policy is implemented effectively, FEGG will:

- identify and include fraud and corruption risks within its risk management processes
- develop and maintain appropriate control systems in each department & operation level to reduce the risk of fraud and corruption
- encourage a culture of prevention and deterrence
- encourage staff and others to be vigilant and report any genuine suspicions of fraudulent activity
- ensure that if a fraud occurs, a prompt and thorough investigation takes place, without regard to position held or length of service of associates concerned
- take appropriate disciplinary and legal action in all cases, where necessary
- review systems and procedures to prevent similar frauds
- ensure that anti-fraud considerations are built into recruitment, procurement & vendor onboarding processes, etc.

5. Definitions :

5.1 Fraud:

The term fraud is used to describe a whole range of activities such as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. In its broadest sense fraud also refers to the intention to deceive a person or organization in order to obtain an advantage, avoid an obligation or cause loss.

5.2 Whistleblower : A whistleblower is a person who exposes wrongdoings in an organization relating to illegal, dishonest, dangerous, or fraudulent practices

5.3 Complainee : The term Complainee refers to the One who is complained about; i.e the subject of a complaint.

6. Scope of the policy :

6.1 Reportable Conduct:

Reportable Conduct includes malpractices and events that you have reasonable grounds to suspect involving, but not limited to:

- Abuse of authority
- Breach of contract
- Negligence causing substantial and specific danger to public health and safety
- Manipulation of organization data/records
- Financial irregularities, including fraud or suspected fraud or deliberate error in preparations of Financial Statements or Misrepresentation of financial reports
- Any unlawful act whether Criminal/ Civil

- Pilferage of confidential/proprietary information
- Deliberate violation of law/regulation
- Wastage/misappropriation of company funds/assets
- Breach or failure to implement or comply with any approved FEGG policies or values
- Unethical behavior or injustice causing exploitation

6.2 Policy exclusion : What this Policy does not address:

This policy is not designed to:

- Question financial or business decisions taken by the organization
- Reconsider any matters which have already been investigated under other policies or procedures issued by the organization
- Address an employee's personal work-related grievances such as a grievance with your superior, an interpersonal conflict between you and another employee, or a decision relating to your employment or engagement, such as a transfer, promotion, or disciplinary action. Personal work-related grievances must be raised with your manager or HR representative through the grievance redressal mechanism.

7. Whistleblowing Management Procedure: It is important that any act of fraud or wrongdoing by staff or others working on behalf of FEGG is reported and properly dealt with.

7.1 Whistle Committee:

- a. The whistle committee to redress a Protected Disclosure against the level of **L3 associates & below** would be as follows:
 1. Chief Executive Officer – Chairperson
 2. CFO – Member
 3. Associate Director HR - Member
- b. The committee for Protected Disclosure against the CEO & the direct reports (**L1 to L2**) will be as follows:
 1. Founder & Board Member - Chairperson
 2. 2 other board members as chosen specifically by the Founder basis the complaint reported - Members

7.2 Whistleblowing method :

- a. All Protected Disclosures should be reported in writing by the Whistle Blower as soon as possible, but not later than **30 (thirty) working days** after the Whistle Blower becomes aware of the same and should either be typed or written in a legible handwriting in English or Hindi.

Complaint against (Level)	Reporting methods:
L3 - L8	<p>1. Email to awaaz@educategirls.ngo , gayatri.nairlobo@educategirls.ngo (CEO's Email address)</p> <p>and / or</p> <p>2. Send hard copy complaint enclosed in an envelope marked as "Strictly Confidential" to: To, Gayatri Nair Lobo, Chief Executive Officer, Educate Girls, 103/C104 1st Floor, Remi Bizcourt, Shah Industrial Estate, Off Veera Desai Road, Andheri West, Mumbai, Maharashtra 400053</p>
L1 & L2 (core leadership team)	<p>1. Email to safeenahusain@educategirls.ngo (Founder's email address)</p> <p>and / or</p> <p>2. Send hard copy complaint enclosed in an envelope marked as "Strictly Confidential" to: To, Safeena Hussain, Founder & Board Member, Educate Girls, 103/C104 1st Floor, Remi Bizcourt, Shah Industrial Estate, Off Veera Desai Road, Andheri West, Mumbai, Maharashtra 400053</p>

- b. All Protected Disclosures can be made as below:
- c. The whistleblower is expected to provide complete data in the report, inclusive of but not limited to:

- (a) Name and contact information of the whistleblower, including phone number, email address and address; and
- (b) Details on the concerns: name of the person in question, date of report, place and reasons, and evidence (if any).

7.3 Template for reporting violations:

A sample format of a whistleblower report is below:

Whistleblowing Report (indicate the non-applicable section by indicating N/A)	
Date of Disclosure:	
Your Name:	
Your Employee Code (if EG employee):	
Your Contact Details	Mobile: Email address: Address:
Description of Alleged Improper Practice:	
Attachments (any supporting evidence for the allegations)	
When did the incident occur	
Where did it occur	
How it occurred	
How did it come to your knowledge	
Names of the person/ people responsible for the improper practice	

(Complainee(s))		
Department(s) of the alleged person / people involved		
Names of any other people in possession of relevant information		
Names of associates with whom improper practice was discussed (if any)		
Estimate of value of financial loss/involved		
<input type="checkbox"/> I hereby authorize the disclosure of my identity if the Whistleblowing committee reasonably believes it is necessary or appropriate.	<hr style="width: 20%; margin: 0 auto;"/> Disclosing Person	

7.4 Whistleblower Anonymity & Protection:

We do not encourage our associates to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish the intent with which the complaint is made & whether any allegations are credible.

For this reason, **FEGG will NOT consider concerns raised anonymously.**

FEGG will however endeavor to protect the identity of the associate making the disclosure where the person does not want their identity to be revealed so far as is consistent with effectively progressing the investigation.

Whistleblower protections are provided in two important areas: confidentiality and retaliation. The organization will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any

whistleblower who believes he/she is being retaliated against must contact the Human Resources Head immediately.

However, the right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged or investigated (including making a false allegation intentionally for malice) that is established through the investigation.

7.5 Confidentiality of the concerned parties:

The identities of all the concerned parties, including **the whistleblower & the complaine**, shall be kept confidential in the process as far as possible, and will not be disclosed to anyone other than the investigating committee, whistle committee or any person that is related to the investigation.

7.6 Investigating Procedure:

On receipt of a disclosure, EG will strive to deal with this in a timely and professional fashion, in accordance with the indicative timescales detailed below:

- Upon receipt of the written complaint, the whistle committee shall in the first instance, make discreet preliminary inquiry, in such a manner and within **07 working days of receipt of the report** to ascertain whether there is any basis for proceeding further to investigate the disclosure.
- If the matters reported are concerning Child Protection violation or Sexual harassment against women at workplace, the concerned committees will be contacted & notified & the procedures for handling such concerns as outlined in the respective policies will be followed.
- If there is a basis, then the whistle committee will appoint appropriate members to form an **“Investigating Committee”** to conduct a detailed investigation of the disclosure received from the WhistleBlower. The whistle committee must ensure that the investigation committee formed must not have a conflict of interest in the complaint whatsoever.
- The Investigating Committee will do a detailed fact-finding Investigation who, in the first instance, will arrange to meet with the person making the allegation to discuss their concern and identify what evidence exists. The fact-finding investigation may involve interviewing witnesses and referring to written evidence.
- The fact finding investigation **shall normally avoid any cross examination or contact proceedings between the whistleblower and complaine** in order to protect the whistleblower from any possible retaliation from the complaine. In case this is absolutely necessary for due investigation, the investigating & whistle committee must ensure the protection of the concerned parties.

- The investigation shall be completed **within 90 calendar days** of receipt of the Protected Disclosure. In special circumstances, if it needs more time to conclude the investigation, the whistle blower will be kept informed of the same with the reasons for this.
- The investigating committee will submit the case report to the whistle committee upon completion of the investigation.

7.7 Post investigation actions:

- If the findings of the investigation conclude commission of an unethical and improper act **beyond reasonable doubt & have sufficient evidentiary basis**, a disciplinary action including up to termination, as deemed appropriate & will be initiated against the person concerned by the whistle committee on the basis of the severity of violation, the analysis of investigation findings, nature of the complaint & the evidentiary record available.
- Where grave wrongdoing is identified, a decision will be made as to whether the issue should be reported to any statutory authorities including the Police Department, Child Welfare Committee (CWC) and/or donors etc. Criminal activity will be reported to the police. Such decisions will be taken by the Whistle Committee.
- FEGG will take appropriate action to mitigate any ongoing risk identified including taking action to end any risk of harm to people and/or financial loss and correct any policy, procedural or system error or weakness.
- The whistle blower will be kept informed of the overall progress of the investigation and will be informed of the overall outcome of the process at its conclusion. It may not be possible, however, to provide the whistleblower with full details about the action taken as this could breach the confidentiality of the person(s) involved.
- The decision of the Whistle Committee shall be final and binding. However, in exceptional cases where the Whistleblower is not satisfied with the outcome of the investigation and the decision, he/she can raise the matter to the Board outlining the reasons.

7.8 Safety of records:

All documentation related to the disclosure & the investigation including the disclosure in writing or any thing documented along with the results of investigation relating thereto shall be retained by the management in confidentiality for a minimum period of three years.

8. Responsible Reporting:

The organization does not expect the whistleblower to provide absolute evidence proving the misconduct or delinquency he or she reports, but his or her concerns must be well grounded, made in good faith & must not be made falsely or for personal gain. Where the whistleblower has a hidden

agenda, or cannot justify the truthfulness or reliability of the thing reported, or makes a false whistleblowing out of malice for the sake of personal interests, he or she might be subject to disciplinary actions or other appropriate legal action.

The investigation committee during the course of the investigation would evaluate the intent and credibility of the allegations with the whistleblower.

9. Policy Review & Supervision:

Management will supervise the periodic review, approval, implementation & effectiveness of this policy. FEGG reserves its right to amend or modify this Policy in whole or in part, at any time as deemed necessary. However, such amendment or modification will be communicated with all associates.

10. Accessibility of Policy:

This policy will be shared via email with all associates and be published on internal HRMS for ready reference.

The policy will be shared with all current partners as a part of the contract engagement and renewal process.

The policy will also be published on the FEGG website for public view.