

NAVNEET FOUNDATION Whistleblower Policy

Objective

Navneet Foundation is committed to upholding the highest standards of integrity, transparency, and accountability in all its operations. This Whistleblower Policy is designed to encourage employees, volunteers, partners, and stakeholders to report concerns about unethical behavior, misconduct, fraud, or violation of policies, without fear of retaliation.

Scope

This policy applies to all staff members, consultants, volunteers, vendors, and other individuals associated with Navneet Foundation across all projects and locations.

What Can Be Reported

The policy covers concerns including, but not limited to:

- Financial or operational mismanagement
- Fraud, bribery, or corruption
- Violation of laws, policies, or ethical standards
- Abuse of authority or resources
- Harassment or discrimination
- Actions that compromise child protection, safety, or human rights

Reporting Mechanism

- Concerns can be reported confidentially in writing or verbally to the designated Whistleblower Officer or any member of the senior management.
- Anonymous complaints will be considered if they contain sufficient evidence to support investigation.
- The whistleblower must act in good faith and have reasonable grounds for raising a concern.

Protection Against Retaliation

Navneet Foundation prohibits retaliation, discrimination, or harassment against anyone who raises a concern in good faith. Anyone attempting to harm or intimidate a whistleblower will face disciplinary action.

Investigation and Action

- All reports will be treated seriously and investigated promptly.
- The identity of the whistleblower will be kept confidential, to the extent possible.
- Based on the outcome of the investigation, appropriate corrective or disciplinary action will be taken.



False Allegations

Deliberate misuse of this policy or false allegations made with malicious intent may lead to disciplinary measures.

Review

This policy will be reviewed annually or as needed to ensure effectiveness and alignment with evolving organizational needs and legal standards.

This policy has been approved by trustees of Navneet Foundation at its meeting held on 29^{th} August, 2025.