



UNITED INDIA INSURANCE COMPANY LIMITED  
HEAD OFFICE 24, WHITES ROAD CHENNAI  
CIN: U93090TN1938GOI000108

---

ERM DEPARTMENT



# WHISTLE BLOWER POLICY 2019

**Table of Contents**

- 1. Preamble ..... 4**
- 2. Definition..... 4**
- 3. Scope and Coverage ..... 5**
- 4. Disqualification .....6**
- 5. Procedure for lodging complaint/ making disclosure under the Policy ..... 6**
- 6. Procedure for handling the Protected Disclosure ..... 7**
- 7. Protection ..... 7**
- 8. Reporting ..... 8**
- 9. Date of Commencement of the Policy ..... 8**
- 10. Authority to administer the Policy..... 8**
- 11. Review ..... 8**
- Annexure A .....9**

## Document Summary

<b>AUTHORS</b>	ERM DEPARTMENT
<b>REVIEWED BY</b>	General Manager, ERM Department  Chief Risk Officer and Deputy General Manager, ERM Department
<b>CURRENT VERSION</b>	1.1
<b>DATE OF CURRENT VERSION</b>	12 <sup>th</sup> July 2019
<b>DATE OF ORIGINAL VERSION</b>	25 <sup>th</sup> October 2013
<b>DOCUMENT CIRCULATION</b>	UIIC HO - All Departments, ROs, LCBs and Operating Offices
<b>OWNER</b>	ERM Department
<b>APPROVED BY</b>	UIIC BOARD

## Revision History

Version	Revision	Issue Date	Changes
1	0	25 <sup>th</sup> October 2013	Initial Approved Policy
1	1	12 <sup>th</sup> July 2019	<p><b>Whistle Blower Policy 2019</b></p> <ul style="list-style-type: none"> <li>• Para 8 “Reporting” has been revised to introduce the system of reporting Whistle Blower Complaints to the CVO every quarter.</li> <li>• Para 5.5 and 6.5 with regard to anonymous/pseudonymous complaints have been revised in line with CVC guidelines dated 7.3.2016.</li> <li>• Para 9.1 has been revised with respect to effective date of the policy and new Para 9.2 introduced for effective date of amendment to the policy</li> </ul>



**UNITED INDIA INSURANCE COMPANY LIMITED  
HEAD OFFICE  
ENTERPRISE RISK MANAGEMENT DEPARTMENT**

**WHISTLE BLOWER POLICY 2019**

**1. Preamble**

- 1.1 United India Insurance Co Ltd is committed to the highest standards of ethics, integrity & professionalism in all the activities & operations that it conducts and has defined systems and procedures in place.
- 1.2 The Company encourages an open and transparent system of working and dealings between the employees, policyholders and members of general public coming into contact with the Company.
- 1.3 The Company has adopted a Whistle Blower Policy, which outlines the Company's commitment to ensure that all directors, employees, and parties in a direct contractual/ fiduciary relationship with the Company or any other person, are able to raise concerns regarding any serious irregularities or any unfair practice or any event of misconduct or any illegal activity occurring in the Company.
- 1.4 The Policy will ensure that
- 1.4.1 whistle blowers are protected from any harassment or any unfair practice or treatment
  - 1.4.2 such concerns raised are properly investigated and necessary action is taken.

**2. Definition**

The definitions of some of the key terms used in this Policy are given below.

- 2.1 "Disciplinary Action" means any action that can be taken on the completion of/ during the investigation proceedings including but not limiting to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.
- 2.2 "Fraud Risk Management Committee (FRMC)" means the Committee constituted by Chairman-cum-Managing Director, under Fraud Risk Management Policy.
- 2.3 "Nodal Officer" is the officer nominated by Chairman-cum-Managing Director, under Fraud Risk Management Policy, who would report to the FRMC, RMC and Board.

2.4 "Investigators" mean those persons authorised, appointed, consulted, including the police.

2.5 "Protected Disclosure" means any communication made in good faith that discloses or demonstrates information that may evidence unethical/ improper activity or suspected fraud or abuse transaction.

2.6 "Subject" means a person against whom a Protected Disclosure has been made.

2.7 "Whistle Blower" means director, employee, and parties in a direct contractual and/ or fiduciary relationship with the Company or any other person, making a Protected Disclosure under this Policy

### 3. **Scope and Coverage**

3.1 All directors, employees and parties in a direct contractual and/ or fiduciary relationship with the Company or any other person, are eligible to make Protected Disclosures under the Policy. The Protected Disclosures must be in relation to matters concerning the Company and its functioning.

3.2 The Policy covers events which have taken place / suspected to take place involving:

3.2.1 Breach of any law or regulation

3.2.2 Criminal offence

3.2.3 Breach of Company's policies, practices or procedures, employee code of conduct or rules

3.2.4 Instances of suspected /actual fraud

3.2.5 Manipulation of Company data/ records

3.2.6 Misappropriation of Company funds/ assets

3.2.7 Material misrepresentation made by or on behalf of the Company

3.2.8 Pilferation of confidential information

3.2.9 Abuse of authority by the directors/ employees of the Company

3.2.10 Any activity which is unethical, biased, illegal or detrimental to the financial and &/ or reputational interest of the Company.

3.3 The Policy should not be used for raising frivolous, malicious, unfounded or baseless allegations.

#### **4. Disqualifications**

- 4.1 Any abuse of the protection under this policy will warrant disciplinary/ penal action as decided by Nodal Officer, in consultation with Fraud Risk Management Committee and referred to the appropriate Authority with recommendations for necessary action as deemed fit.
- 4.2 Whistle Blower who makes false or baseless allegations, with a mala fide intention or knowing it to be false or baseless would be subject to disciplinary/ penal action, as appropriate, under the relevant rules/ laws and will not be protected under the policy.

#### **5. Procedure for lodging complaint/ making disclosure under the Policy**

- 5.1 All Protected Disclosures, in the prescribed format (Annexure A) should be in writing and sent only by post in a closed/ secured envelope.
- 5.2 The envelope should be addressed to the Nodal Officer under the Fraud Risk Management Policy, at Head office, superscribed “Complaint under Whistle Blower Policy” and should be sent to him/ her directly.
- 5.3 If the envelope is not superscribed and closed, it will not be possible to protect the Whistle Blower under the Whistle Blower Policy and the same will be dealt with as complaint received in the normal course.
- 5.4 All Protected Disclosures shall be forwarded under a covering letter which shall bear the full identity of the Whistle Blower.
- 5.5 No action shall be taken on anonymous/ pseudonymous complaints and such complaints shall be filed.
- 5.6 The text of the Protected Disclosure should be carefully drafted so as not to give any details or clue as to his/ her identity.
- 5.7 Protected Disclosure should be factual, specific and verifiable.
- 5.8 Protected Disclosure should be to a large extent “full and proper” so as to cause a meaningful understanding of the subject matter of disclosure.
- 5.9 In order to protect identity of the person, the Nodal officer will not issue any acknowledgement and Whistle Blowers are advised not to enter into any further correspondence in their own interest. The Company assures that, subject to the facts of the case being verifiable, it will take the necessary action, as provided under the

Whistle Blower policy. If any further clarification is required, the Nodal officer will get in touch with the Whistle Blower.

## **6. Procedure for handling the Protected Disclosure**

6.1 All Protected disclosures received will be serially entered in a register with full particulars viz. number & date of receipt of protected disclosure, brief contents/allegations in the disclosure, etc.

6.2 The Nodal Officer shall examine the Protected Disclosure material and analyse the same and if found fit for further action under this policy, shall put up the same with supporting notes to the Fraud Risk Management Committee and cause discussions thereto. Pursuant to such discussions, the Nodal Officer and the Fraud Risk Management Committee would arrive at a conclusion as to how to further dispose of the said Protected Disclosure.

6.3 All Protected Disclosures forwarded to CVO under this Policy will be thoroughly investigated and investigation report will be submitted to the Nodal Officer. If the Protected Disclosure is of such nature as to be referred to Law Enforcement Agencies, CVO may examine the same and take necessary action as warranted, based on credible facts and circumstances disclosed by the Whistle Blower.

6.4 If an investigation leads the CVO to conclude that an improper or unethical act has been committed, CVO shall advise the management of the Company to take disciplinary action.

6.5 No action shall be taken on anonymous/ pseudonymous complaints and such complaints shall be filed.

## **7. Protection**

7.1 The identity of the Whistle Blower and the identity of the subject will be kept confidential.

7.2 No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy.

7.3 The Company shall not resort to any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers.

7.4 Complete protection will, therefore, be given to Whistle Blowers against any unfair practice like retaliation, threat of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his normal/ allotted duties/functions including making further Protected Disclosure.

7.5 Any other person assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.

7.6 Normally the identity of the Whistle Blower is protected under the policy. In the event of perceived harassment of the Whistle Blower by the affected employee/ third party, he may file an application before the General Manager (HR) seeking redressal in the matter. The authority would then intervene suitably to protect the Whistle Blower.

## **8. Reporting**

The Nodal Officer shall submit a quarterly report to the Fraud Risk Management Committee, CVO, Risk Management Committee and Board, about all Protected Disclosures referred to him/her since the last report together with the results of investigations, if any.

## **9. Date of commencement of the policy**

9.1 The Policy has come into force with effect from the Financial Year 2013-14

9.2 The amendment in respect of quarterly reporting to the CVO and handling of anonymous/ pseudonymous complaints shall come into force with effect from date of approval of the Board.

9.3 The Policy will be uploaded in the company's intranet and website for notice of all employees, policyholders and members of the public

## **10. Authority to administer the Policy**

The Nodal Officer under the Fraud Risk Management Policy shall be the authority to administer the Whistle Blower Policy, under the oversight of Fraud Risk Management Committee of the Company.

## **11. Review**

The policy shall be reviewed on a yearly basis and placed before the Risk Management Committee of the Board and the Board of Directors for approval.





**UNITED INDIA INSURANCE COMPANY LIMITED**

**Disclosure Form (under Whistle blower Policy)**

Name:

Address:

Contact No. (Landline/ Mobile):

If employee, Employee code/ Department/ Office:

Email ID:

**Protected Disclosure**

Subject (a person against or in relation to whom }

a Protected Disclosure has been made) }

(Name and other details to be furnished)

Protected Disclosure Details:

Place:

Date:

Signature of the whistle blower