CivicDataLab's Whistleblowing Policy

1. Introduction

CivicDataLab Private Limited is committed to the highest standards of integrity, accountability, and ethical conduct. This Whistleblowing Policy is designed to encourage employees, interns, contractors, partners, and other stakeholders to raise concerns about suspected wrongdoing or unethical behavior without fear of retaliation.

2. Purpose of the Policy

The purpose of this policy is to:

- Encourage individuals to report concerns relating to unethical, illegal, or unsafe conduct.
- Establish a transparent and confidential process for addressing reported concerns.
- Protect whistleblowers from victimisation or retaliation.
- Ensure CivicDataLab complies with relevant legal and ethical obligations in India and abroad.

3. Scope

This policy applies to all current and former:

- Employees, directors, interns, and consultants.
- Vendors, partners, grantees, collaborators, and third-party contractors.

  It covers concerns arising from any of CivicDataLab's activities, whether domestic or international.

4. Definition of Whistleblowing

Whistleblowing refers to the act of raising concerns about actual, suspected, or potential wrongdoing within an organisation.

A whistleblower is any person who reports misconduct in good faith. Such misconduct may involve unethical behavior, legal violations, or threats to health, safety, or the public interest.

5. Reportable Concerns

Examples of reportable conduct include, but are not limited to:

- Fraud, corruption, or financial mismanagement
- Bribery or misuse of company resources
- Harassment, abuse, or discrimination
- Breaches of data protection and privacy laws
- Violation of legal, regulatory, or policy obligations
- Misconduct that poses risks to people, the environment, or the organisation's reputation

6. Reporting Mechanism

Whistleblowers can raise concerns through the following channels:

- Directly to a senior manager, leadership, or People and Culture Manager
- Anonymously via a secure online form (to be made available if necessary)

7. Protection of Whistleblowers

CivicDataLab strictly prohibits retaliation against anyone who reports concerns in good faith. Protection includes, but is not limited to:

- Job security and professional standing
- Protection from threats, harassment, or discrimination
- Support throughout any inquiry or investigation

Any individual found retaliating against a whistleblower will be subject to disciplinary action.

8. Confidentiality

All concerns raised will be treated with the highest level of confidentiality. Whistleblowers' identities will be disclosed only where legally required or with their consent. All documentation and proceedings will be secured to prevent unauthorised access.

9. Investigation Process

All reports will be reviewed by a designated authority and, if necessary, a formal investigation will be initiated.
The process will be:

- Fair and unbiased
- Conducted confidentially and respectfully

- Followed up with appropriate remedial, disciplinary, or legal action based on the findings

Whistleblowers will be kept informed of the outcome, where possible.

10. Training and Awareness CivicDataLab will provide periodic training and awareness to employees, interns, and key stakeholders to familiarise them with the whistleblowing process and their rights and responsibilities.

11. Compliance with Local and International Laws This policy aligns with the **Whistle Blowers Protection Act, 2014**, the **Companies Act, 2013**, and other applicable Indian legislation. Where relevant, it also draws from international best practices including the **OECD Guidelines**, **Sarbanes-Oxley Act (USA)**, and global partner requirements.

12. Monitoring and Review The whistleblowing process and this policy will be reviewed periodically to ensure it remains effective, relevant, and compliant with legal requirements. Lessons learned from reports will inform improvements in governance.

13. Conclusion

CivicDataLab is committed to maintaining a culture of openness, integrity, and accountability. This Whistleblowing Policy provides a mechanism for all individuals associated with the organisation to raise concerns and ensure that CivicDataLab remains a safe, ethical, and responsible workplace.
