

MEMORANDUM

Subject: Whistle Blowers Policy

Date: 31st Dec. 2024

To: All Employees

Preamble:

Dhirubhai Ambani University is committed to honesty, integrity, openness and accountability and expects all employees to maintain high standards in accordance with its policies and procedures. The Policy has been formulated in compliance with the Whistle Blowers Protection Act of 2014 enacted by the Parliament of India. Employees are empowered to follow the right conduct and do their duty honestly and without fear.

Policy:

If any employee, past or current, observes illegal, immoral, or dishonest conduct anywhere in the university, and if he is not satisfied with the response of his immediate superior, he can blow the whistle and inform the top authorities of the university about the matter. The aims of this policy is to encourage every employees, without the fear of retaliation, to raise concerns regarding suspected unethical and/or illegal conduct or practices, so that the University can address and correct inappropriate conduct and actions.

Type of concerns to be reported:

This policy covers malpractices and events which have taken place/suspected to take place involving:

1. General malpractice e.g. immoral or unethical
2. Academic malpractice
3. Breaches of law or regulation e.g. health and safety obligations of the University
4. Criminal offences e.g. fraud or bribery Information
5. Financial or procedural irregularity
6. Manipulation of the University data
7. Breach of University policy
8. Violation of confidential / proprietary information
9. Violation of Intellectual Property Rights

This Policy should not be used in place of the University grievance procedures or be a route for raising malicious or unfounded allegations against colleagues, co-students, faculty members or staff.

Procedure and Conditions for raising a whistleblowing concern:

Concerns listed above should be reported preferably in writing/through email as soon as practicable to the Director General, DAU along with his/her identity. Information received from an anonymous employee shall not be considered for further investigation.

This policy should not be interpreted as a means to express once grievances or a route for making malicious allegations against any employees. For whistle blowing, it is important to note that the reported information should not be available in public and it should not be trivial. The purpose of whistle blowing is to correct something wrong and not to serve any personal advancements. Whistle blowing must be in good faith. The employee must be convinced that the reported information is genuine and significant. Additionally, he should have sufficient documents to support his conclusion

and allegations. The whistle blower should also be satisfied that his whistle blowing is not the first step, but it is the last step to seek justice and the right moral conduct of the university

All complaints being filed should be clearly marked as being filed under the University's Whistle-blower Policy. More importantly, there shall not be any retaliatory and discriminatory action against the concerned employee. However, Incidents of retaliation against any employee reporting will result in appropriate disciplinary action against anyone responsible.

Confidentiality:

The University takes seriously its responsibility to enforce this Policy, and therefore encourages any person reporting a concern to identify him or herself so as to facilitate any resulting investigation. However, if the person wants to maintain confidentiality, the university shall ensure that his/her identity is not revealed to anyone other than those involved in investigating the concerns. Raising a concern anonymously does make it more difficult to investigate it properly. Concerns shall be kept confidential to the extent possible, consistent with the need to conduct a thorough and complete investigation.

Investigations:

The University shall determine the scope, manner, and parameters of the investigation and report to the appropriate University officers. All reports shall be promptly investigated, and appropriate corrective action shall be taken when warranted by the investigation. The compliance offices receiving reports has the responsibility for investigating concerns and issuing corrective actions and reports the same to the Office of the Director General; which in turn shall forward, as required, reports of all corrective actions to the President of the University.

Records:

The University shall retain on a strictly confidential basis for a period of seven (5) Years (or otherwise as required under the University's Record Retention and Disposal Policies in effect from time to time) all records relating to any reported concern and to the investigation and resolution thereof. All such records are confidential to the University, and such records shall be considered privileged and confidential, subject only to a lawful court order or a written request from relevant government authorities.