

Whistleblowing Policy: The Insider



As an organization, we are committed to conducting our business operations with honesty and integrity and we expect our people also to adhere to the highest standards of ethical, moral, and legal conduct of business operations. However, no one is perfect! We do at times face the risk of things going wrong. The Whistleblowing Policy aims to encourage people who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment.

The policy is applicable to:

- All the employees of REA India and its subsidiaries
- Employees of other agencies deployed for within the Company for official purposes, whether working from any of the Company's offices or any other location
- Contractors, vendors, suppliers, or agencies (or any of their employees) providing any material or service to the Company
- Customers of the Company
- Any other person having an association with the Company

Definitions

"Employee" means every employee of REA India and its subsidiaries.

"Whistleblower" is someone who makes a Protected Disclosure under this Policy.

“Whistleblower Committee” means a committee of persons who are nominated or appointed to conduct detailed investigation of the disclosure received from the whistleblower and recommend disciplinary action.

“Protected Disclosure” means a written communication, relating to unethical practice or behavior or violation of code of conduct made in good faith by the whistleblower.

What is Whistleblowing?

The term ‘whistleblowing’ refers to the disclosure of information which relates to suspected wrongdoing or malpractice that is running within the organization. It is the duty of every employee who observes or learns about any form of unethical behavior in the organization to report it to the concerned authorities.

Whistleblowing matters may include but are not confined to:

- Breach of legal or regulatory requirements
- Criminal offences, breach of civil law and miscarriage of justice
- Malpractice, impropriety, or fraud relating to internal controls, accounting, auditing and financial matters
- Fraud and corruption (e.g. receive or offer or promise any gift/reward as a bribe from/to any client or business vendor)
- Disclosure / breach to confidentiality of any specific, vital, sensitive, and confidential information related to the Company
- Abuse including physical, sexual, psychological, or financial, exploitation or negligence
- Harassment
- Endangerment of the health and safety of an individual
- Damage caused to the environment
- Violation of rules of conduct applicable within the Company
- Improper conduct or unethical behaviour likely to prejudice the standing of the Company
- Deliberate concealment of any of the above

The Policy should not be used in place of the Company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues.

Protection and Confidentiality

We are committed to ensuring that the whistleblower should not suffer any form of intimidation, reprisal, retaliation, or adverse reaction organizationally as a consequence of reporting a concern about any of the above matters. The Company will make every effort to treat all disclosures in a confidential and sensitive manner.

The identity of the individual making the allegation will not be divulged without their consent. However, there may be circumstances in which the Company may be required or legally obliged to reveal the identity. For example, where an investigation leads to legal proceedings being initiated. In such cases, the Company will take all reasonable steps to ensure that the individual suffers no detriment. Harassment or victimization of a genuine whistleblower will be treated as gross misconduct, which if proven, may result in dismissal.

We may take into consideration anonymous complaints also for appropriate investigation based on the seriousness and credibility of the concern raised and on the likelihood of confirming that the allegation is raised through reliable sources. However, we encourage individuals to provide their names to facilitate addressing the concern more effectively and expeditiously

Responsible Disclosure

In making a disclosure, individual should exercise due care to ensure the accuracy of the information. If the whistleblower is mistaken, s/he will not be at risk of losing the job or suffering any form of retribution as a result, provided that s/he is acting in good faith. On the other hand, disciplinary action will be taken against employee deliberately raising false and malicious allegations. In an extreme case, vexatious or wild allegations could give rise to legal action on the part of the persons complained about.

Please note that it is the duty of all individuals at REIA India to notify the Company if they observe, or learn of, any unethical business conduct or illegal acts. Failure to promptly raise a known or suspected violation is considered an unethical behavior.

Procedure

How to report any unethical or illegal conduct? Here's how:

1. The whistleblower can report an incident via any of the below channels:
 - Via a phone call on our hotline number 00 0800 400 1256. This hotline service has been set up in partnership with Safecall who will provide a professional, independent, external, and confidential means for you to report your concerns. All calls are treated with utmost confidentiality by independent staff who will, should you wish for whatever reason, not disclose your name. Alternatively, Safecall can be contacted via the web www.safecall.co.uk/report
 - Through a written complaint either via email or through physical letter. Disclosures if being made through a physical letter should be addressed to "Whistleblowing Committee" and should be sent to Echelon Square, Plot No 25, Sector 32, Gurgaon - 122001 in a sealed envelope clearly marked "Strictly Private and Confidential - To be Opened by Addressee" to ensure the confidentiality
 - The whistleblower may also choose to email the matter on whistleblower@proptiger.com
2. The complainant's complaint should state the incident, nature of the unethical behaviour, last occurrence, and evidence for the incident. Required supporting documents (if any) should be attached
3. The whistleblower need not prove the concern but must demonstrate sufficient grounds for raising the concern
4. If there is evidence of criminal activity, activity on solicitation and acceptance of advantages or breach of legal and regulatory requirements, the party responsible for the internal investigation may legally be obliged to inform the relevant public or regulatory bodies as appropriate

How will the investigation be carried out?

There is a standard procedure followed post reporting of an incident.

1. Once any issue is reported, a 'Whistleblower Committee' shall be constituted that will do an initial investigation on the authenticity of the complaint within 7 days of the issue reported
2. Composition of the REA India Whistleblower Committee
 - Chair (Chief Executive Officer),
 - Member (Chief Human Resources Officer)
 - Leadership Team (LT) member (selected by the Chair)
 - Senior Legal Counsel
 - Any additional member (selected by the Chair)
3. The matters raised may:
 - be investigated internally
 - be referred to the Police
 - be referred to the External Auditor; and/or
 - form the subject of an independent inquiry
4. If the complaint is not found authentic, there will be investigation to ascertain if the complaint was a genuine misunderstanding or if it was a deliberate act to defame any employee or cause harm to any of the Company's assets or the reputation of the Company
5. If the disclosure is against any member of the Committee, such member will not participate in the proceedings and will be suspended from the Committee until the outcome is arrived at
6. The Whistleblower committee will be responsible for ensuring that the investigation process is fair and transparent
7. Sufficient and fair opportunity to the accused person to prove / justify his stand and case, including personal hearing as may be required, and shall ensure complete fairness in the process of investigation

8. Investigation shall conclude within 90 working days of receiving the complaint. However, it may be extended based on the discretion of the Committee in case of further time required for investigation, insufficient proof etc.

The person designated to investigate the complaint will write to the complainant wherever reasonably practicable of the concern being received:

- acknowledging that the concern has been received
- advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be

In respect of providing visibility to REA Group (Australia), the REA India's Whistleblower Committee shall inform the REA Group Chief Risk Officer (CRO) and Audit, Risk and Compliance Committee Chair (ARCC Chair) on all Whistleblower reports within two business days from receipt of the report. The CRO and ARCC Chair shall have the authority to appoint an internal or external investigator, or delegate the REA India Whistleblower Committee to investigate and report back on the outcome of the investigation.

Disciplinary Action

After the detailed investigation, the committee will share the findings of the investigations and their conclusion on the complaint raised to the HR department

1. If there is not enough proof, the accused will be kept under careful observation
2. If Committee determines that a compliance or ethical violation has occurred, it will take the following actions as deemed fit:
 - Any person found guilty of violation of the Company's Code of Conduct will be subject to disciplinary action up to and including termination of employment
 - Appropriate procedures, policies and controls will be established in all departments to ensure early detection of similar violation
 - During the investigation period or at any time thereafter, if any individual is found to be tampering with evidence, then it would lead to severe disciplinary action

3. It is the discretion of the Whistleblower Committee to inform the Whistleblower of the outcome of the responsible disclosure made
4. Whistleblower committee and the Ombudsmen will submit a detailed report including the action taken on the concerns raised of the decision within five working days from the date of decision to the competent authority