

## **ANTI BRIBERY AND CORRUPTION POLICY Praajak**

- 1. Introduction:** New Alipore Praajak Development Society-(Praajak) is committed to setting up, widely acceptable standards for transparency and accountability across organisational processes. Praajak strives in attaining its mission through compliance of high legal and ethical standards. Praajak does not tolerate any form of bribery, embezzlements or corruption, and will uphold all laws countering bribery, fraud and corruption in all forms.
- 2. Purpose:** The purpose of this policy is to set out the responsibilities of Praajak and those individuals acting on its behalf in observing and upholding Praajak's position on bribery and corruption. Every individual or group of individuals, associated to Praajak in any form, whether staff members, ad-hoc staff, engaged in program activities of the organization, consultants, associates, contractors, vendors, interns, volunteers, partner organisations and any other party with a financial or trustee-beneficiary relationship with Praajak are expected to share this commitment. The basic objective of this statement is setting out the policy of Praajak towards the prevention and identification of bribery and corruption and the certain procedures to be followed, if at all, any fraud is found or having an idea / impression of its existence.
- 3. Scope:** This policy applies to Staffs, ad-hoc staffs, Advisers, Consultants, Associates, Suppliers, Partners and Individuals acting on behalf of the Society, irrespective of their location. Governing Body (GB) has been excluded from the scope, considering the fact that GB is not directly involved in any of Praajak's day-to-day business and/or routine functions. The Governing Body has vested powers and responsibilities to various functionaries and constituted committees to execute routine functions of the organization.
- 4. Statement:**

4.1 Praajak will not engage in bribery or any form of unethical inducement or payment including facilitation payments and "kickbacks." the Staff, Ad-hoc staff, Advisers, Consultants, Associates, Suppliers, Partners and Individuals acting on behalf of the Praajak are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activities of Praajak.

4.2 Praajak expects its suppliers and partners to act with integrity and without thought or actions involving bribery and/or corruption and will, where appropriate, include clauses to this effect in relevant contracts.

## **5 Prohibited Activities:**

5.1 It is prohibited, directly or indirectly, for any staff or individual acting on behalf of Praajak to offer, give, request or accept any bribe (i.e. gifts with mala-fide intentions, loan, payment, reward or advantage, either in cash or any other form of inducement), to or from any person or company in order to gain commercial, contractual or regulatory advantage for Praajak, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

5.2 This policy requires employees and individuals acting on behalf of Praajak:

5.2.1 Not to offer, promise or make any bribe or unauthorised payment or inducement of any kind to anyone;

5.2.2 Not to solicit transaction by offering, promising or making any bribe or unofficial payment to suppliers;

5.2.3 Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorised by Praajak in the ordinary course of business;

5.2.4 To refuse any bribe or unusual payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers;

5.2.5 Not to make facilitation payments. These are payments used by work or individuals to secure or expedite the performance of a routine or necessary

action to which the payer of the facilitation payment has a legal or other entitlement. Praajak will not tolerate or condone such payments being made;

## **6 Criminal Offence (as defined in IPC)**

6.1 It is a criminal offence to:

6.1.1 Offer a bribe;

6.1.2 Accept a bribe;

6.1.3 Fail to prevent a bribe (only applies to commercial organisations)

6.2 Staffs, ad-hoc staff, advisers, consultants, associates, suppliers, partners and any individuals acting on behalf of Praajak should be made aware that if they are found guilty by a court of committing bribery, embezzlement or fraudulence an individual could face prosecution as per the norms of IPC (Indian Penal Code).

## **7 Gifts and Hospitality:**

Praajak realises that giving and receiving of gifts and hospitality without any mala-fide intentions, or in other words, where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy. If staff receives gifts from stakeholders, vendors it is recorded in a gift registry at the central office. The staff can retain or leave the gift at the central office, at the discretion of the director.

## **8 Raising a Concern**

8.1 If an employee or an individual acting on behalf of Praajak is offered a bribe, or a bribe is solicited from them, they should not agree to it unless their immediate safety is in jeopardy. Should this be the case, the employee or individual should at first instance contact the Field Coordinator/Project Coordinator as soon as they are able to do so. The employee or individual may be required to give a written account of the events to assist with any investigation. If the concerned Field Coordinator/Project Coordinator is involved in such an act, the individual may

directly contact the Director of Praajak, or Governing Body member for reporting such case.

8.2 Employees or individuals acting on behalf of Praajak are encouraged to raise concerns about any instance of bribery or corruption at the earliest possible stage. The employee or individual raising a concern can do so in confidence and without fear of reprisals. All reports raised are taken seriously and, where appropriate, investigated. No employee or individual will be discriminated against in any way as a result of reporting a concern in good faith.

8.3 If any instance of bribery or corruption is identified; Praajak management will take the remedial steps immediately. Praajak has its own system of investigating its staff member for violation of service conduct including financial irregularities, corruption, fraud or embezzlement. If the charges are proved the delinquent may be awarded penalties depending on the gravity of misconduct.

These rules are based on the following principles: -

8.3.1 The right of Praajak to take appropriate disciplinary steps against any delinquent staff member, consultants, associates who acts in a manner conflicting with the code of conduct and prescribed rules / regulations.

8.3.2 At the same time the rules also recognize the right of delinquent staff member, consultants, associates to a fair hearing and applicable and just disciplinary action.

8.3.3 The emphasis of disciplinary action is on prevention, justice and rehabilitation.

9 **Review of this Policy:** In the interests of maintaining best practice, the contents of this Anti-Bribery and Corruption Policy will be reviewed by the Governing Body or Praajak Management Team every three years.

10 **Reporting and Investigation:**

10.1 An individual can report at three levels, as indicated below:

10.1.1 Field Coordinator / Project Coordinator/manager at primary level.

10.1.2 Director at secondary level, in case if the concerned Field Coordinator / Project Coordinator/manager is/are involved in such an act.

10.2 Investigation:

10.2.1 Praajak Management Team will form a committee to investigate.

10.2.2 Governing Body will have the discretion to form a committee to investigate, in such a case where any member(s) of the Management Team is involved in the act.

10.3 A record of all investigations and outcomes will be maintained by the Director for sharing with donors, based on request. This will be only for the Director eyes only.

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