



## **ANTI-CORRUPTION POLICY**

### **INTRODUCTION**

Sakshi is committed to setting up utmost standards for transparency and accountability in all its affairs. Sakshi strives in attaining its mission through compliance with high legal and ethical standards. Sakshi does not tolerate any form of bribery, embezzlements or corruption, and will uphold all laws countering bribery, fraud and corruption in all forms.

### **OBJECTIVE**

The objective of this policy is to set out the responsibilities of Sakshi and those individuals acting on its behalf in observing and upholding Sakshi's position on bribery and corruption. Every individual or group of individuals, associated with Sakshi in any form, whether the staff members, the ad-hoc staff engaged in the program activities of the organization, the consultants, the contractors, the interns, the partner organisations and any other party with a financial or trustee-beneficiary relationship with Sakshi are expected to share this commitment. The basic objective of this statement is setting out the policy of Sakshi 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.

### **SCOPE**

This policy applies to the employees, interns, associates, consultants, volunteers, beneficiaries, donors, clients, suppliers and partners acting on behalf of the Society, irrespective of their location.

### **STATEMENT**

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

Sakshi 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.

### **PROHIBITED ACTIVITIES**

It is prohibited, directly or indirectly, for any staff or individual acting on behalf of Sakshi 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 Sakshi, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

This policy requires employees and individuals acting on behalf of Sakshi

- Not to offer, promise or make any bribe or unauthorised payment or inducement of any kind to anyone;
- Not to solicit business by offering, promising or making any bribe or unofficial payment to suppliers;
- Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorised by Sakshi in the ordinary course of operations;
- 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;
- To report any breaches of this policy's principles or standards or of any associated

**It is a criminal offence (as per the IPC) to:**

- Offer a bribe;
- Accept a bribe;
- Fail to prevent a bribe (only applies to commercial organisations)

All employees, interns, associates, consultants, volunteers, partners and any individuals acting on behalf of Sakshi 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).

**GIFTS AND HOSPITALITY**

Sakshi realises that giving and receiving 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.

**RAISING A CONCERN**

If an employee or an individual acting on behalf of Sakshi 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 Director Finance 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 Director Finance is involved in such an act, the individual may contact the Executive Director for reporting the case and likewise, if the concerned Executive Director is involved in such an act, the individual may directly contact the Gov of Sakshi for reporting such a case.



Employees or individuals acting on behalf of Sakshi 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.

If any instance of bribery or corruption is identified; Sakshi management will take the remedial steps immediately. Sakshi has its own system of investigating its staff members 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 the misconduct.

**Review of this Policy:** In the interests of maintaining best practice, the contents of this Anti-Corruption Policy will be reviewed by the Governing Council every three years.

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

- Director Finance
- Executive Director
- Governing Council

**Fact Finding:** The fact-finding will be carried out by The Ethics Committee comprising of

- Human Resource In-Charge
- Finance Lead
- Governing Council Member
- Executive Director

The Findings & Recommendations made by the Ethics Committee will be binding on the Management.

**Date Issued / Revised :** 1st April 2020

***End of Document***