

SHRAMAJIVI MAHILA SAMITY
ANTI-CORRUPTION POLICY



SHRAMAJIVI MAHILA SAMITY
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INTENT/PURPOSE/OBJECTIVE:

To address the risks of fraud and corruption and prevent deterrence, detection of fraud, bribery and all other corrupt practices in an organizational framework and here, in Shramajivi Mahila Samity (SMS). We at SMS are dedicated to our work and it is our policy to conduct all our activities in an honest and ethical manner. We are committed to act professionally, fairly with zero-tolerance approach towards corruption and maintain consistency in all our dealings and relationships while we operate, implement and enforce effective systems to counter bribery/corruption.

Our policy sets out with specific responsibilities of staff with regard to the risks of fraud, and bribery and corruption. Further it provides information and guidance to all who are associated with the organization on how to recognize and deal with corruption issues.

THIS POLICY IS ADDRESSABLE TO:

All who are associated with the organization i.e. it addresses all individuals working at all level, including partners, consultants, employees(whether permanent, contractual or temporary), interns of the organization.

TERMS AND DEFINITIONS

“Fraud” is civil or criminal deception, intended for unfair or unlawful financial or personal gain or to cause loss to another party, such as by misappropriation of assets, abuse of position, collusion, false representation and/or prejudicing someone's rights. Additionally, acts of theft are included in this Global Policy.

“Bribery and Corruption”: A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. This includes offering, promising, giving, accepting or soliciting money, a gift or other private advantage as an inducement to, or reward for doing something that is illegal, an abuse of power or authority, a breach of trust or duty, or otherwise improper, in the course of carrying out an organization’s activities. Corruption can include nepotism or

favoritism. Neither fraud nor corruption are restricted to monetary or material gain (of any size), but could also include intangible benefits such as status or information, and can be for the benefit of an individual or interest group.

RECEIVABLE GIFTS

Our policy does not entirely forbid giving and receiving gifts. A gift can be given or accepted only when the following requirements are met:

When the intent is not to influence a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits. Terms and conditions for giving/receiving gifts:

- i. When the gift is in organization's name and not in individual's name.
- ii. It is in compliance with rules and regulations of the given area and local laws.
- iii. It should not include cash or any cash equivalent such as vouchers.
- iv. It should be given/taken openly in public and not in person.
- v. taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time
- vi. No gifts to be offered to or accepted from any politicians, political parties and government officials or representatives, without any prior approval of the Chief functionary.
- vii. It is considered appropriate to offer or receive gifts in certain circumstances like festivals. For example: People exchange small gifts during Diwali, Dusshera.

GENERAL GUIDELINES

Responsibilities:

It is the duty of every individual who is associated with the organization to read, understand and comply with the organization's policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those

working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other employees if they breach this policy.

Raising concern

Anyone in the organization is encouraged to raise concerns regarding certain issue or suspicion of malpractice at the earliest possible stage. If someone is uncertain whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the chief functionary.

Steps to be taken by the victim of bribery or corruption

If someone is asked to or offered a bribe by a third party or if someone suspects that certain things will occur or happen or believe that one is a victim of another form of unlawful activity then one must inform the chief functionary. It is of utmost importance to inform the chief functionary as it will reduce the vulnerabilities of the situation and save the individual from getting exploited.

Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you

believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the intranet.

Communication

Our policy work with the principle of zero-tolerance to bribery and corruption hence, this must be communicated to all the suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Who is responsible for the policy?

The chief functionary has overall responsibility for ensuring that our policy is in compliance with our ethical and legal obligations and all those working with us comply with it.

Every person to whom this policy applies is responsible for the success of this Policy and should ensure that he / she should use it to disclose any suspected activity or wrongdoing.

SUPERVISION AND REVIEW

The Chief functionary will supervise the effectiveness and review the implementation of this policy; it will be assessed routinely considering its effectiveness, suitability and adequacy. All the improvements and amendment in government policies for anti-corruption will be reflected in our policy quarterly or yearly whichever is in compliance with the other policies of the organization. Also, internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing in the organization or in relation with the organization.