Anti-Corruption and Anti-Bribery Policy
DEVI Sansthan

1. Introduction

DEVI Sansthan is committed to conducting its operations with integrity, transparency, and accountability. Corruption and bribery undermine the trust placed in us by our beneficiaries, donors, partners, and the communities we serve. This Anti-Corruption and Anti-Bribery Policy outlines our zero-tolerance approach to corruption and bribery in any form and provides guidelines to ensure compliance with applicable laws and ethical standards.

This policy applies to all employees, volunteers, consultants, contractors, partners, and any other individuals or entities associated with DEVI Sansthan.

2. Purpose

The purpose of this policy is to:

- Prevent corruption, bribery, and unethical practices in all aspects of our work.
- Ensure compliance with applicable anti-corruption laws and regulations.
- Promote a culture of integrity, transparency, and accountability.
- Provide clear guidelines on acceptable and unacceptable behavior.

3. Scope

This policy applies to:

- All employees, including full-time, part-time, and temporary staff.
- Volunteers, interns, and consultants working with DEVI Sansthan.
- Partners, vendors, contractors, and other third parties associated with the organization.
- All activities, programs, and operations conducted by DEVI Sansthan, both domestically and internationally.

4. Definitions

1. **Corruption:** The abuse of entrusted power for private gain, including bribery, embezzlement, fraud, and nepotism.
2. **Bribery:** Offering, giving, receiving, or soliciting something of value to influence the actions or decisions of an individual in a position of power.
3. **Facilitation Payments:** Small payments made to secure or expedite routine government actions (e.g., processing permits or licenses). DEVI Sansthan prohibits facilitation payments.

---

5. Policy Statement

DEVI Sansthan strictly prohibits:

1. **Bribery:** Offering, promising, giving, accepting, or soliciting bribes in any form, including cash, gifts, favors, or other benefits.
2. **Corruption:** Engaging in any form of corrupt practice, including embezzlement, fraud, or misuse of organizational resources.
3. **Conflict of Interest:** Allowing personal interests to influence or appear to influence professional decisions.
4. **Kickbacks:** Receiving or providing unauthorized payments or benefits in exchange for business advantages.
5. **Facilitation Payments:** Making or accepting small payments to expedite routine government actions.

---

6. Guidelines for Acceptable Conduct

1. **Gifts and Hospitality:**
    o   Gifts and hospitality may be offered or accepted only if they are modest (less than Rs 500/-), infrequent, and do not create a conflict of interest or the appearance of impropriety.
    o   Gifts of cash or cash equivalents (e.g., gift cards) are strictly prohibited.
2. **Donations and Sponsorships:**
    o   Donations and sponsorships must be transparent, properly documented, and aligned with DEVI Sansthan's mission and values.
    o   Donations must not be used to influence decisions or gain improper advantages.
3. **Procurement and Contracts:**
    o   All procurement processes must be fair, transparent, and competitive.
    o   Contracts with vendors, partners, or contractors must be free from any form of bribery or corruption.

4. **Reporting Concerns:**
   o Employees, volunteers, and stakeholders are encouraged to report any suspected incidents of corruption or bribery through the organization's whistleblower mechanism.

---

7. Responsibilities

1. **Leadership:** The leadership team is responsible for promoting a culture of integrity and ensuring compliance with this policy.
2. **Managers and Supervisors:** Managers and supervisors must ensure that their teams understand and adhere to this policy.
3. **Employees and Volunteers:** All individuals associated with DEVI Sansthan are expected to act with integrity and report any concerns about corruption or bribery.
4. **Partners and Contractors:** Third parties working with DEVI Sansthan must comply with this policy and any applicable anti-corruption laws.

---

8. Reporting and Investigation

1. **Reporting Concerns:**
   o Concerns about corruption or bribery can be reported through the organization's whistleblower mechanism, which includes anonymous reporting options.
   o Reports should include as much detail as possible, such as the nature of the concern, names of individuals involved, and any supporting evidence.
2. **Investigation:**
   o All reports will be investigated promptly, fairly, and impartially.
   o Investigations will be conducted by an independent committee or external investigator, if necessary.
3. **Confidentiality:**
   o The identity of the whistleblower will be kept confidential to the extent possible.
   o All investigations will be handled with discretion and sensitivity.

---

9. Consequences of Violations

Violations of this policy will result in disciplinary action, up to and including termination of employment or engagement with DEVI Sansthan . Legal action may also be pursued if necessary.

10. Training and Awareness

DEVI Sansthan will provide regular training and awareness programs to ensure that employees, volunteers, and stakeholders understand their responsibilities under this policy.

11. Review and Updates

This policy will be reviewed annually to ensure its effectiveness and relevance. Updates will be made as needed to reflect changes in laws, regulations, or organizational priorities.

12. Commitment

DEVI Sansthan is committed to maintaining the highest standards of integrity and accountability. We believe that combating corruption and bribery is essential to achieving our mission and earning the trust of the communities we serve.

Approved by the Governing Board at its meeting held on

This policy will be communicated to all employees, volunteers, partners, and stakeholders to ensure widespread understanding and adherence.

Nixon Joseph
Group Director
DEVI Sansthan