POLICY
FOR ANTI-CORRUPTION
WORK

Gitanjali Foundation

GITANJALI FOUNDATION
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गीतांजलि फाउंडेशन

F.C.R.A. Registration no. - 146930075

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Gitanjali Foundation
Policy for Anti-Corruption Work

Overview

The Anti-Corruption Policy of Gitanjali Foundation establishes a comprehensive framework designed to prevent, detect, and address corruption in all its forms within the organization and its operations. This policy highlights our unwavering commitment to integrity, transparency, and ethical conduct in every aspect of our work.

1. Purpose

The objectives of this policy are to:
- Define and explicitly prohibit all forms of corruption.
- Establish clear and robust procedures for preventing, detecting, and addressing corruption.
- Foster a culture of integrity and transparency within the organization.
- Ensure strict compliance with all relevant anti-corruption laws and regulations.

2. Scope

This policy is applicable to:
- All employees, volunteers, and interns associated with Gitanjali Foundation.
- All contractors, suppliers, partners, and stakeholders involved with the foundation.
- All activities, projects, and operations undertaken by the foundation.

3. Principles

Zero Tolerance
The foundation adopts a zero-tolerance approach towards all forms of corruption, ensuring that any form of corrupt activity is strictly prohibited and appropriately sanctioned.

Transparency
All financial and operational activities must be conducted with the utmost transparency to uphold the trust and confidence of all stakeholders.

Accountability
Individuals involved in corrupt practices will be held accountable and face appropriate disciplinary actions.

Ethical Conduct
The foundation promotes ethical conduct and integrity among all its members, ensuring that all actions are in line with our ethical standards and values.

4. Definitions

- Corruption: The misuse of entrusted power for private gain, including acts such as bribery, embezzlement, fraud, extortion, and nepotism.
- Bribery: The act of offering, giving, receiving, or soliciting something of value to influence the actions of an individual in a position of power.
- Embezzlement: The fraudulent appropriation of funds or property entrusted to one's care.
- Fraud: Wrongful or criminal deception intended to result in financial or personal gain.
- Extortion: The practice of obtaining something, especially money, through force or threats.
- Nepotism: Favoritism granted to relatives or friends regardless of merit.

5. Policy Statements

5.1 Prohibition of Corruption
- All forms of corruption, including bribery, embezzlement, fraud, extortion, and nepotism, are strictly prohibited.
- Employees, volunteers, and affiliates must not engage in or tolerate corrupt practices.

5.2 Gifts and Hospitality
- Accepting or offering gifts, hospitality, or other benefits that could influence or appear to influence the performance of duties is prohibited.
- Any gifts or hospitality received or offered must be reported and recorded according to the organization's guidelines.

5.3 Conflicts of Interest
- Employees and volunteers must avoid situations where personal interests conflict with the interests of the foundation.
- Any potential conflicts of interest must be disclosed and managed appropriately.

6. Preventive Measures

6.1 Training and Awareness
➢ Provide regular training on anti-corruption laws, policies, and procedures to all employees and volunteers.
➢ Raise awareness about the importance of integrity and ethical conduct.

6.2 Internal Controls
➢ Implement robust internal controls to prevent and detect corruption, including financial controls, audits, and checks and balances.
➢ Ensure that all financial transactions are properly documented and authorized.

6.3 Due Diligence
o Conduct thorough due diligence on all partners, suppliers, and contractors to ensure they adhere to anti-corruption standards.
o Include anti-corruption clauses in contracts and agreements with third parties.

7. Reporting and Investigation

7.1 Reporting Mechanisms
➢ Establish confidential and accessible reporting mechanisms for employees, volunteers, and stakeholders to report suspected corruption.
➢ Encourage a culture of whistleblowing where individuals feel safe to report unethical conduct without fear of retaliation.

7.2 Investigation Procedures
➢ Investigate all reports of suspected corruption promptly and thoroughly.
➢ Appoint an independent investigation team to handle corruption cases to ensure impartiality.

7.3 Disciplinary Action
➢ Take appropriate disciplinary action against individuals found guilty of corruption, which may include termination of employment, legal action, and reporting to relevant authorities.
➢ Ensure that disciplinary actions are consistent and proportionate to the severity of the offense.

8. Monitoring and Evaluation

8.1 Regular Audits
➢ Conduct regular internal and external audits to assess compliance with anti-corruption policies and procedures.
➢ Use audit findings to strengthen internal controls and address any identified weaknesses.

8.2 Performance Metrics
➢ Develop metrics to monitor the effectiveness of anti-corruption measures, such as the number of reported cases, resolution times, and outcomes.
➢ Use these metrics to evaluate and improve the anti-corruption program continuously.

8.3 Feedback and Improvement
➢ Seek feedback from employees, volunteers, and stakeholders on the anti-corruption policy and its implementation.
➢ Use feedback to update and refine the policy and procedures regularly.

9. Roles and Responsibilities

9.1 Board of Trustees
➢ Provide oversight and ensure that anti-corruption measures are integrated into the organization's strategic objectives and policies.
➢ Review and approve significant anti-corruption policies and procedures.

9.2 Executive Committee
➢ Implement the Anti-Corruption Policy and ensure compliance across all operations and programs.
➢ Monitor the effectiveness of anti-corruption measures and report to the Board.

9.3 Anti-Corruption Officer
➢ Appoint an Anti-Corruption Officer to oversee the implementation of the policy, handle reports of corruption, and conduct investigations.
➢ Provide regular updates to the Executive Committee on the status of anti-corruption efforts.

9.4 Employees and Volunteers
- ➢ Uphold the principles of the Anti-Corruption Policy in their daily activities and interactions.
- ➢ Report any suspected corruption promptly through the established reporting mechanisms.

10. Communication and Awareness

10.1 Policy Dissemination
- ➢ Ensure that the Anti-Corruption Policy is accessible to all employees, volunteers, and stakeholders.
- ➢ Communicate the policy clearly and regularly through training sessions, newsletters, and the organization's website.

10.2 Awareness Campaigns
- ➢ Conduct awareness campaigns to educate employees, volunteers, and stakeholders about the importance of anti-corruption and ethical conduct.
- ➢ Use various communication channels, such as workshops, seminars, and online platforms, to reach a broad audience.

11. Legal and Regulatory Compliance

11.1 Compliance with Laws
- ➢ Ensure that the Anti-Corruption Policy complies with all relevant local and international anti-corruption laws and regulations.
- ➢ Stay informed about changes in anti-corruption legislation and update the policy accordingly.

11.2 Collaboration with Authorities
- ➢ Cooperate fully with law enforcement and regulatory authorities in the investigation and prosecution of corruption cases.
- ➢ Report incidents of corruption to relevant authorities as required by law.

Conclusion

The Anti-Corruption Policy of Gitanjali Foundation reflects our unwavering commitment to integrity, transparency, and ethical conduct. By implementing robust preventive measures, establishing clear reporting and investigation procedures, and fostering a culture of accountability, we aim to eliminate corruption and uphold the highest standards of conduct in all our activities. Our dedication to anti-corruption practices ensures the trust and confidence of our stakeholders and supports our mission of social upliftment and community development.