



Anti-Bribery and Anti-Corruption Policy

INTRODUCTION:

National Foundation for India (NFI) is an organization that has a strong and transparent operational system to ensure utmost accountability in all affairs. NFI does not tolerate any form of bribery, embezzlement, or corruption and will uphold all laws countering bribery, fraud, and corruption in all forms.

PURPOSE:

The purpose of this policy is to set out the responsibilities of NFI and those individuals acting on its behalf in observing and upholding NFI position on bribery and corruption. Every individual or group of individuals associated to NFI in any form, whether staff members, ad-hoc staff engaged in the program activities of the organization, consultants, contractors, interns, partner organisations and any other party with a financial or trustee-beneficiary are expected to share this commitment. The basic objective of this statement is setting out the policy of NFI towards the prevention and identification of bribery and corruption and the procedures to be followed, if at all, any fraud is found or have an idea / impression of its existence.

SCOPE:

This policy applies to all individuals working at all levels and grades including Directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, business partners, and third-party representatives anywhere in the world, or any other person associated with us, wherever located who may be acting on behalf of NFI.

STATEMENT:

1. NFI will not engage in bribery or any form of unethical inducement or payment including facilitation payments and "kickbacks." All staff, ad-hoc staff, advisers, consultants, suppliers, partners and individuals acting on behalf of the NFI are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activities of NFI.
2. NFI 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:

1. It is prohibited, directly or indirectly, for any staff or individual acting on behalf of NFI 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 NFI, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.
2. This policy requires employees and individuals acting on behalf of NFI:
3. Not to offer, promise or make any bribe or unauthorised payment or inducement of any kind to anyone.
4. Not to solicit business by offering, promising, or making any bribe or unofficial payment to suppliers.
5. Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorised by NFI in the ordinary course of business.
6. To refuse any bribe or unusual payment and to do so in a manner that is not open to misunderstanding or give rise to false expectation, and to report any such offers.
7. Not to make facilitation payments. These are payments used by businesses 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. NFI will not tolerate or condone such payments being made.

CRIMINAL OFFENCE (AS DEFINED IN IPC)

It is a criminal offence to:

- a. Offer a bribe.
- b. Accept a bribe.
- c. Fail to prevent a bribe (only applies to commercial organisations)

Staffs, ad-hoc staff, advisers, consultants, suppliers, partners and any individuals acting on behalf of NFI 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).

GIFT AND HOSPITALITY

NFI acknowledges 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.

RAISING A CONCERN

- If an employee or an individual acting on behalf of NFI 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 finance-In charge 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 any finance persons is involved in such an act, the individual may contact 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 Governing Board of NFI for reporting such case.

- Employees or individuals acting on behalf of NFI 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, NFI management will take the remedial steps immediately. NFI 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: -

- i. The right of NFI to take appropriate disciplinary steps against any delinquent staff member, who acts in a manner conflicting with the code of conduct and prescribed rules / regulations.
- ii. The rules also recognize the right of delinquent staff member to a fair hearing and applicable and just disciplinary action.
- iii. The emphasis of disciplinary action is on prevention, justice, and rehabilitation.

Reporting and Investigation:

An individual can report at two levels, as indicated below:

- Finance in-charge / Executive Director (ED) at primary level.
- Governing Body at secondary level

Investigation:

- Executive Director (ED) will form a committee to investigate.
- Governing Body will have the discretion to form a committee to investigate, in such case where the Executive Director is involved in the act.