



ANTI-BRIBERY & ANTI-CORRUPTION POLICY



Shakti Organisation
Catalysing Sustainable Development

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SHAKTI'S Anti-Bribery and Anti-Corruption policy

Introduction:

Shakti Organisation(SSCSO) is committed to the setting up, utmost standards for transparency and accountability in all its affairs. Shakti Organisation(SSCSO) strives in attaining its mission through compliance of high legal and ethical standards. Shakti Organisation(SSCSO) does not tolerate any form of bribery, embezzlements 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 Shakti Organisation(SSCSO) and those individuals acting on its behalf in observing and upholding Shakti Organisation(SSCSO)'s position on bribery and corruption. Every individual or group of individuals, associated to Shakti Organisation(SSCSO) 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 organizations and any other party with a financial or trustee-beneficiary relationship with Shakti Organisation(SSCSO) are expected to share this commitment. The basic objective of this statement is setting out the policy of Shakti Organisation(SSCSO) 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 it's existence.

Scope:

This policy applies to the Staffs, ad-hoc staffs, Advisers, Consultants, Suppliers, Partners, Individuals and Governing Body members, acting on behalf of the Society, irrespective of their location.

Statement:

Shakti Organisation(SSCSO) 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 Shakti Organisation(SSCSO) are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activities of Shakti Organisation(SSCSO).

Shakti Organisation(SSCSO) 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 Shakti Organisation(SSCSO) 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 Shakti Organisation(SSCSO), 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 Shakti Organisation(SSCSO):

Not to offer, promise or make any bribe or unauthorized 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 authorized by Shakti Organisation(SSCSO) in the ordinary course of business;

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;

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. Shakti Organisation(SSCSO) will not tolerate or condone such payments being made;

To report any breaches of this policy's principles or standards or of any associated

Criminal Offence (as defined in IPC)

It is a criminal offence to:

1. Offer a bribe;
2. Accept a bribe;
3. Fail to prevent a bribe (only applies to commercial organizations)
4. Staffs, ad-hoc staff, advisers, consultants, suppliers, partners and any individuals acting on behalf of Shakti Organisation(SSCSO) 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:

Shakti Organisation(SSCSO) realizes 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 Shakti Organisation(SSCSO) 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 Unit/Centre 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 Unit/Centre In-Charge 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 General Secretary of Shakti Organisation(SSCSO) for reporting such case.

Employees or individuals acting on behalf of Shakti Organisation(SSCSO) 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; Shakti Organisation(SSCSO) management will take the remedial steps immediately. Shakti Organisation (SSCSO) has it's own system of investigating it's 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: -

The right of Shakti Organisation(SSCSO) 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.

At the same time the rules also recognize the right of delinquent staff member to a fair hearing and applicable and just disciplinary action.

The emphasis of disciplinary action is on prevention, justice and rehabilitation.

Review of this Policy: In the interests of maintaining best practice, the contents of this Anti-Fraud Policy will be reviewed by the Executive Body every three years.

Reporting and Investigation:

Executive Director/Project Manager at primary level.

General Secretary at secondary level, in case if the concerned Executive Director/Project Manager is/are involved in such an act.

Investigation:

Governing Body will have the discretion to form a committee to investigate, in such a case where any member(s) of the Executive Body is involved in the act.

N.B- {this Procurement policy is approved by the Executive Body of Shakti Organisation on 29.09.2006 and came into immediate effect.}



General Secretary
Shakti Organisation (SSCSO)

**General Secretary,
Shakti Organisation**

Appendix 1 - Declaration of Understanding form - Template

This declaration is intended to be completed by all staff.

DECLARATION OF UNDERSTANDING OF THE ANTI-BRIBERY & CORRUPTION AND BRIBERY ACT
CODE OF CONDUCT AND POLICY

I confirm that I have read the Shakti Organisation(SSCSO)'s Anti-Bribery & Corruption and Bribery Act Code of Conduct and Policy.

I also confirm that I have understood the requirements of the Code of Conduct and Policy and my responsibilities in relation to this document.

I understand that if I am party to any breach of the Code of Conduct and Policy then it could be regarded as Gross Misconduct and that this may result in disciplinary action, up to and including dismissal, in accordance with the Shakti Organisation(SSCSO)'s disciplinary procedures

Signed:

Name:

Designation:

Date: