

THE GOOD SAM FOUNDATION

POLICY FOR ANTI-CORRUPTION

GSF

Anti-Corruption Policy

1. **Introduction:** The Good Sam Foundation (GSF) is committed to setting up, utmost standards for transparency and accountability in all its affairs. GSF strives in attaining its mission through compliance of high legal and ethical standards. GSF does not tolerate any form of bribery, embezzlements or corruption, and will uphold all laws countering bribery, fraud and corruption in all forms.
2. **Purpose:** The purpose of this policy is to set out the responsibilities of GSF and those individuals acting on its behalf in observing and upholding GSF position on bribery and corruption. Every individual or group of individuals, associated to GSF 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 organisations and any other party with a financial or trustee-beneficiary relationship with GSF are expected to share this commitment. The basic objective of this statement is setting out the policy of GSF 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 its existence.
3. **Scope:** This policy applies to the Employees, ad-hoc staff members, Advisers, Consultants, Suppliers, Partners and Individuals acting on behalf of the Foundation, irrespective of their location.
4. **Statement:**
 1. GSF will not engage in bribery or any form of unethical inducement or payment including facilitation payments and "kickbacks." All the Employees, Ad-hoc staff, Advisers, Consultants, Suppliers, Partners and Individuals acting on behalf of the GSF are required to avoid any activities that might lead to, or suggest a conflict of interest with the activities of GSF.
 2. GSF 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.
5. **Prohibited Activities:**
 1. It is prohibited, directly or indirectly, for any staff member or individual acting on behalf of GSF 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 GSF, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.
6. **Compliances:**

This policy requires employees and individuals acting on behalf of GSF:

 1. Not to offer, promise or make any bribe or unauthorised payment or inducement of any kind to anyone;
 2. Not to solicit favours by offering, promising or making any bribe or unofficial payment to suppliers;
 3. 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;

4. 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. GSF will not tolerate or condone such payments being made;
5. To report any breaches of this policy's principles or standards or of any associated

7. Criminal Offence (as defined in IPC)

1. It is a criminal offence to:
 1. Offer a bribe;
 2. Accept a bribe;
 3. Fail to prevent a bribe
2. Staff members, ad-hoc staff, advisers, consultants, suppliers, partners and any individuals acting on behalf of GSF 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).

8. Gifts and Hospitality

GSF realises 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.

9. **Review of this Policy:** In the interests of maintaining best practice, the contents of this Anti-Corruption Policy will be reviewed by the Senior Management every three years.

10. Reporting and Investigation:

1. An individual can report to the following as indicated below:
 1. Centre in-charge (CiC) / Executive Officer (EO) at the primary level.
 2. Managing Trustee at the secondary level, in case if the concerned Executive Officer (EO) and/or Centre in-charge is/are involved in such an act.
2. Investigation:
 1. Governing Body will form a committee to investigate the matter and recommend appropriate corrective action within six weeks of the matter being reported in writing.

