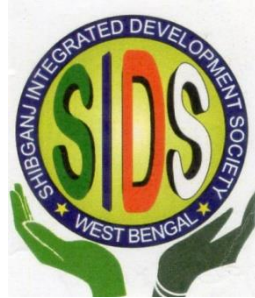


ANTI- CORRUPTION POLICY



Approved by: Executive Committee of Shibganj Integrated Development Society

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ANTI - CORRUPTION POLICY

Purpose and background:

This Anti-Corruption Policy establishes basic standards and a framework for the prevention and detection of bribery and corruption. It promotes compliance with the anti- corruption laws in all of the places where SIDS operates.

Anti-corruption laws prohibit offering or providing benefits, directly or indirectly, to government officials for the purpose of securing an undue advantage or improper benefit, further, prohibit bribery of individuals in the private sector. This Policy must comply with all applicable anti- corruption laws.

Objectives:

- *Set out our responsibilities to comply with laws against bribery and corruption; and*
- *Provide guidance on how to recognize and deal with bribery and corruption issues.*

Policy

SIDS's policy to conduct all of our business in an honest and ethical manner. Our designated persons are prohibited from engaging in any bribery or potential bribery. This includes a prohibition against both direct bribery and indirect bribery, including payments through third parties.

Applicability:

This policy applies to all dealings, transactions, and expenses for and on behalf of SIDS. This policy applies to all stakeholders working for or acting on behalf of SIDS or any of its subsidiaries.

This includes officers, directors, employees (whether regular, or temporary), consultants, contractors, trainees, staff, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees.

In this policy, third party means any individual or organization that an associate may come into contact with during the course of his/her engagement with the SIDS, and includes actual and potential clients, customers, suppliers, distributors, agents, advisers, business associates and government and public bodies.

Bribery:

Bribery means to obtain or accept or attempt to obtain or promise for giving, receiving, or accepting of financial or other advantages, or any other thing of value, to retain or obtain a commercial advantage. Bribes are payments made in the form of money or anything else of value in return for a business favour or advantage.

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Bribery involves the exchange of anything of value to secure an undue business advantage. The term “anything of value” covers cash as well as anything that can have value to the receiver, such as gifts, payment of education or living expenses, donations, home improvement work, or investments. Even a promise to offer something in the future in return for an undue business advantage. Bribery can involve at least two primary parties: the person who pays the bribe and the person who receives it. Both raise serious ethical and legal issues and involve a breach of trust and duty by both parties

Kickbacks:

Kickbacks arise when suppliers or service provider pay part of their fees to the individuals who give them the contract or some other business advantage. Paying kickbacks to win a bid may be one of the most common forms of bribery. Kickbacks are expressly prohibited by anti-corruption legislation. SIDS personnel must not offer or make a payment or provide other things of value to any person for the purpose of inducing some improper action by the recipient or gaining an improper advantage.

Third Parties:

Anti-corruption laws prohibit corrupt payments made directly by SIDS personnel and also indirectly through an agent or other intermediary such as a consultant acting. It is unlawful to make a payment of anything of value to any agent or other intermediary if there is reason to believe that any portion of the payment will be offered, given, or promised to anyone else, for a corrupt purpose.

SIDS personnel who manage, supervise, or oversee the activities of third parties working should ensure that such persons or entities understand and fully comply with this Policy. The most important step we take to protect ourselves from liability for improper payments made by third parties is to choose carefully our partners, including agents and consultants, and monitor their conduct.

Facilitation Payments:

Facilitation payments are unofficial payments made to secure or expedite a routine action by authorized official. Unlike bribery, facilitation payments do not result in the receipt of an undue benefit; rather, they simply speed up or facilitate the transaction. SIDS prohibits facilitation payments. Facilitation payments are illegal in most countries and a willingness to offer them often leads to demands for larger, more significant payments.

Accurate Books and Records, and Financial Controls:

An organization should maintain books, records, and accounts that accurately reflect the transactions and dispositions of the organization. SIDS personnel must maintain complete and accurate records with respect to all transactions and expenditures undertaken on behalf of SIDS.

We must exercise special care when transactions involve payments or other benefits to government officials or commercial partners. We must never use “off book” accounts. We must accurately record all payments to public officials or commercial partners.

We must reject and report any requests for false invoices or payment of expenses that are unusual, excessive, or inadequately described. No one must make incomplete or false entries in SIDS books and records for any reason. No payment by or on behalf of the SIDS shall be approved or made if any part of the payment is to be used for an unlawful or improper purpose. No false or misleading entries should be made in any books or financial records of the SIDS for any reason.

Adopt a zero-tolerance approach:

Each Employee must adopt a zero-tolerance policy toward all forms of corruption, including bribery, kickbacks and facilitation payments. To avoid corruption, Employees must:

- Never offer, pay, request or accept bribes or kickbacks, even if requested or directed to do so by a senior manager.*
- Never get involved in any fraudulent or dishonest activity.*
- Never authorize any corrupt activities or behaviors.*
- Never conceal any corrupt or potentially corrupt activity.*
- Never engage in activities that could facilitate corruption, including drafting illegal agreements, falsifying evidence, and giving false evidence in legal proceedings.*

Who is responsible for this policy:

The Secretary has overall responsibility for ensuring that this Policy complies with our legal and ethical obligations and that all those under our control comply with it. All staff should be aware of and understand this Policy on how to implement and compliance of it.

The Ethics Officer is responsible for this Policy and for monitoring and effectiveness. Management at all levels is responsible to understand this Policy and how to implement and adhere to it. Every person to whom this policy applies is responsible for the success of this Policy.

Breaches of the policy and penalties

The breach of this policy by the designated persons of SIDS may lead to disciplinary action being taken in accordance with the SIDS’s Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

All designated persons will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy. If any part of this policy is unclear, clarification should be sought from the Ethics Officer who is responsible for this policy. If necessary, corrective actions shall be prescribed or suggested to appropriate officers and employees for implementation.

Penalties:

The Secretary shall, after considering inputs, from the Ethics Officer have the discretion to recommend appropriate disciplinary action, including suspension and termination of service of such a defaulting Designated Person. The Ethics Officer shall also recommend if the violation is potentially criminal in nature and should be notified to.

Display of policy:

The Policy shall be displayed to all employees through intranet portal of SIDS. Any changes in the Policy shall be notified through the intranet portal by way of updated Policy document.

Periodic review and evaluation:

Our Board of Directors will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness. SIDS reserves the right to amend the terms of this Policy from time to time.

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