



ASEEMA CHARITABLE TRUST ANTI BRIBERY & ANTI CORRUPTION POLICY

Aseema Charitable Trust

G3 Josephine Apartments, Ground Fl, Chimbai Road, Bandra West, Mumbai 400050



ANTI-BRIBERY/ANTI-CORRUPTION POLICY

Ownership	Operations
Forum where approved	Board of Trustees
Date of Approval	April 2023

BACKGROUND:

Aseema Charitable Trust (Aseema/Organisation) is a Mumbai based non-governmental organization with a mission to equip children from marginalized communities with high quality, value based education enabling development of their limitless potential. In Mumbai, Aseema works in partnership with the Municipal Corporation of Greater Mumbai (MCGM) to create centres of excellence within the public education system. In each of these schools, Aseema supports the MCGM by providing teachers who are oriented to Aseema's child friendly approach, making the learning environment stimulating and safe and creating a culture that respects the child and promotes learning.

In order to achieve it's mission Aseema is committed to compliance of high legal and ethical standards. Accordingly, this anti-corruption policy has been designed.

OBJECTIVE:

Aseema's policy is to conduct all the activities in an honest and ethical manner. The organization has a zero-tolerance approach to Bribery and Corruption and is committed to acting professionally, fairly and with integrity in all it's dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.

PURPOSE:

The purpose of this policy is to set out the responsibilities of Aseema and those individuals acting on its behalf in observing and upholding Aseema's position on bribery and corruption. Every individual or group of individuals, associated with Aseema 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 Aseema are expected to share this commitment.

SCOPE:

This policy applies to the Staffs, ad-hoc staffs, Advisors, Consultants, Suppliers, Partners and Individuals acting on behalf of Aseema, irrespective of their location.

DEFINITION:

Bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favor, or a financial or other advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through Third Parties.

POLICY:

Aseema will not engage in bribery or any form of unethical inducement or payment including facilitation payments and "kickbacks." All the Staff, Ad-hoc staff, Advisors, Consultants, Suppliers, Partners and Individuals acting on behalf of Aseema are required to avoid any activities that might lead to, or suggest, a conflict of interest with Aseema's activities.

Aseema's suppliers and partners are expected 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.

1. Prohibited Activities

It is prohibited, directly or indirectly, for any staff or individual acting on behalf of Aseema 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 Aseema, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

Employees and individuals acting on behalf of Aseema should:

- Not offer, promise or make any bribe or unauthorised payment or inducement of any kind to anyone;
- Not solicit business by offering, promising or making any bribe or unofficial payment to suppliers;
- Not request or accept any kind of bribe or unusual payment or inducement that would not be authorised by Aseema in the ordinary course of business;
- 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 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.
- Report to Operations Head any breaches of this policy's principles or standards

It is a criminal offence to:

- Offer a bribe;
- Accept a bribe;

2. Gifts and Hospitality

Aseema 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.

TRAINING:

The Anti-Bribery Policy will be communicated to all staff members, volunteers, and stakeholders through appropriate channels.

The organization will provide regular training to employees and volunteers on fraud prevention, detection, and reporting. This training will cover the organization's code of conduct, internal control procedures, and the whistleblower policy.

CONSEQUENCES:

If any instance of bribery or corruption is identified; Aseema's senior management will take the remedial steps immediately. Aseema 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.

REVIEW:

Anti-Corruption policy will be reviewed annually or as and when required.