

Anti-Bribery And Anti-Corruption Policy

ETASHA is committed to acting professionally, fairly and with integrity in all its dealings and relationships wherever it operates. ETASHA is equally committed to the prevention, deterrence and detection of bribery and other corrupt practices.

“ETASHA” takes a ZERO TOLERANCE approach to bribery and corruption.

The Anti-Bribery and Anti-Corruption Policy (ABAC ‘Policy’) of ETASHA has been developed in accordance with Code of Conduct, policies, rules and regulations adopted by ETASHA and in conformance with the legal and statutory framework of Anti-Corruption Legislation prevalent in India.

The Policy reflects the commitment of ETASHA and its management for high ethical standards doing open and fair dealings, following the best practices of corporate governance and enhancing the organizational reputation. The purpose of this policy is to establish controls to ensure compliance with all applicable anti- bribery and anti-corruption regulations, and to ensure all the dealings of ETASHA are conducted in a socially responsible manner.

Applicability:

This policy applies to all individuals working at all levels, including Directors, senior managers, officers, employees, consultants, contractors, volunteers, interns, agents, sponsors, partners, and third-party representatives, or any other person associated with ETASHA.

Scope:

This policy requires the employees and individuals acting on behalf of ETASHA to be vigilant on the following:

Gifts & Hospitality:

‘Gifts on behalf of ETASHA, its Employees and Representatives to third parties in form of cash in any currency is not allowed’

However, ETASHA 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 documented. This does not constitute bribery and consequently such actions are not considered a breach of this policy. A few examples which are not considered a breach of this policy are:

- Gifts or hospitality from trainees or their families
- Distribution of free masks/ nutritious products etc. to community
- Gifting products made by our entrepreneurs to funders, GC members, volunteers
- Diwali gifts received from funders / other stakeholders



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Bribe:

This policy requires employees and individuals acting on behalf of ETASHA not to offer, give, request or accept any bribe to or from any person or company in order to gain commercial, contractual or regulatory advantage for ETASHA, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

Procedure:

Any employee of ETASHA can make a complaint on any suspected case of corruption or bribery in writing to the immediate Supervisor.

Once a complaint has been filed investigation will be done by the immediate Supervisor along with the CEO. In case the complaint is against the CEO, then he / she can approach the Vice-President of ETASHA who will then resolve the issue.

If an investigation leads the Supervisor and CEO to conclude that an improper or unethical act has been committed, they will take a suitable disciplinary or corrective action against the employee or subject as deemed fit including termination as the case may be.

The investigation shall be completed normally within 15 days of the receipt of the Complaint.

The results of investigation relating thereto shall be retained by the Organization for a minimum period of seven years.

Amendment:

ETASHA reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees and directors unless the same is notified to the Employees and directors in writing.

The Policy comes into effect from 01.04.2021.



Dr. Meenakshi Nayar
President
ETASHA Society