

# **Bhavishya Bharat**

(A Public Charitable Trust)

Flat No:101, First Floor, A-Block

Star GBR Enclave, DK Road, Ameerpet

Hyderabad – 500 016 (Telangana)

## **Anti-Bribery & Anti-Corruption Document** ***(ABCD)***

**Version: 01 / 2020 - 2021**

***Dated: 01 April 2020***

## Anti-Bribery and Anti-Corruption Document (ABCD)

### 1. Introduction:

Bhavishya Bharat is committed to setting the strictest standards of transparency and accountability in all its business. Bhavishya Bharat strives to achieve its mission according to high legal and ethical standards. Bhavishya Bharat does not condone any form of corruption, misappropriation of funds or corruption, and will enforce all laws against corruption, fraud and corruption in all its forms.

### 2. Purpose:

The purpose of this policy is to set out the responsibilities of Bhavishya Bharat and those individuals acting on its behalf in observing and upholding Bhavishya Bharat's position on bribery and corruption. Every individual or group of individuals, associated to Bhavishya Bharat 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 Bhavishya Bharat are expected to share this commitment. The basic objective of this statement is setting out the policy of Bhavishya Bharat 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 employees, special employees, advisors, consultants, vendors, partners and individuals acting on behalf of the Corporation, regardless of their location. The Board of Trustees (BoT) has been excluded from the scope, considering the fact that BoT is not directly involved in any of Bhavishya Bharat's day-to-day business and/or routine functions. The BoT has vested powers and responsibilities to various employee and constituted Operations Management Committees (OMCs) to execute routine functions of the organisation.

### 4. Statement:

4.1 Bhavishya Bharat 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 Bhavishya Bharat are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activities of Bhavishya Bharat.

4.2 Bhavishya Bharat 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:**

5.1 It is prohibited, directly or indirectly, for any staff or individual acting on behalf of Bhavishya Bharat to offer, give, request or accept any bribe like 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 Bhavishya Bharat, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

5.2 The policy requires employees and others acting on behalf of Bhavishya Bharat to:

- 5.2.1 Not to offer, promise or make any bribe or unauthorized payment or inducement of any kind to any person;
- 5.2.2 Do not solicit business by offering, promising or making bribes or informal payments to vendors;
- 5.2.3 Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorised by Bhavishya Bharat in the ordinary course of business;
- 5.2.4 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;
- 5.2.5 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. Bhavishya Bharat will not tolerate or condone such payments being made;
- 5.2.6 To report any breaches of this policy's principles or standards or of any associated

## **6. Criminal Offence as per Indian Penal Code**

6.1 It is a criminal offence to:

- 1. Offer a bribe;
- 2. Accept a bribe;
- 3. Fail to prevent a bribe (only applies to commercial organisations)

6.2 Staffs, ad-hoc staff, advisers, consultants, suppliers, partners and any individuals acting on behalf of Bhavishya Bharat 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).

## 7. Gifts and Hospitality:

Bhavishya Bharat 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.

## 8. Raising a Concern

1. If an employee or an individual acting on behalf of Bhavishya Bharat 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 Project Head 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 staff is involved in such an act, the individual may contact Project Head for reporting the case and likewise if the concerned Project Head is involved in such an act, the individual may directly contact the Director of Bhavishya Bharat for reporting such case.
2. Employees or individuals acting on behalf of Bhavishya Bharat 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.
3. If any instance of bribery or corruption is identified; Bhavishya Bharat management will take the remedial steps immediately. Bhavishya Bharat 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.

These rules are based on the following principles:

1. The right of Bhavishya Bharat 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.
2. At the same time the rules also recognize the right of delinquent staff member to a fair hearing and applicable and just disciplinary action.
  3. The emphasis of disciplinary action is on prevention, justice and rehabilitation.

## 9. Review of this Policy:

In the interests of maintaining best practice, the contents of this Anti-Fraud Policy will be reviewed by the Audit and Executive Council every three years.

## 10. Reporting and Investigation:

1. An individual can report at three levels, as indicated below:

10.1.1 Project Head at primary level.

10.1.2 Advisor or Director at secondary level.

- 10.2 Investigation:

10.2.1 Board of Trustees (BoT) will form a committee to investigate.

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

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**Approved by:**

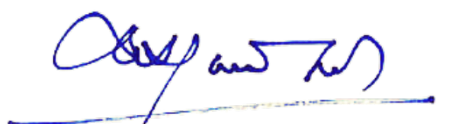
**BBT Operations Management Committee**



Dr Jayant Upadhyay  
Advisor



Hemant Kumar Jha  
Deputy Director (Operations)



Lt Gen Hari Prasad (Retd)  
Managing Trustee

Date : 01 April 2020  
Place : Hyderabad