
MRIDA EDUCATION AND WELFARE SOCIETY

ANTI BRIBERY, ANTI CORRUPTION & WHISTLEBLOWING POLICY



Regd. Address: House No. 795, Near Neekhra Chakki, Amanpour, Madan Mahal, Jabalpur - 482001

Field Address: Riverside Natural School, Next to Central Bank of India, Mohgaon, Mandla - 481663

1. Objective

MRIDA EDUCATION AND WELFARE SOCIETY (henceforth MRIDA) is committed to the prevention, deterrence, and detection of fraud, bribery, and all other corrupt business practices. It is MRIDA's policy to conduct all of its activities with honesty, integrity, and the highest possible ethical standards and vigorously enforce its activity, wherever it operates throughout the operational area, of not engaging in bribery or corruption.

2. Scope and Applicability

This Policy applies to all individuals working for MRIDA at all levels and grades, including all employees (whether permanent, fixed-term or temporary), contractual workers, consultants, trainees, supporting staff, volunteers, interns, or any other person associated with MRIDA. In this Policy, "Third Party(ies)" means any individual or organization who/which come into contact with MRIDA or transact with MRIDA and also includes actual and potential suppliers, business contacts, consultants, intermediaries, representatives, subcontractors, agents, advisers, joint ventures, and government & public bodies (including their advisers, representatives, and officials).

3. Policy Details

A bribe is an inducement, payment, reward, or advantage offered, promised, or provided to any person in order to gain any commercial, contractual, regulatory, or personal advantage. It is illegal to directly or indirectly offer a bribe or receive a bribe. A bribe may be anything of value and not just money -- gifts, inside information, sexual or other favors, corporate hospitality or entertainment, offering employment to a relative, payment or reimbursement of travel expenses -- and can pass directly or through a third party. Corruption includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral, or incompatible with ethical standards. Corruption often results from patronage and is associated with bribery.

4. Gifts and Hospitality

Employees or members of their immediate families (spouse, mother, father, son, daughter, brother, sister, or any of these step- or in-law relationships, whether established by blood or marriage including common-law marriage) should not provide, solicit, or accept cash or its equivalent, entertainment, favors, gifts, or anything of substance to or from competitors,

vendors, suppliers, or others. Nothing should be accepted, nor should the employee have any outside involvement, that could impair, or give the appearance of impairing, an employee's ability to perform his/her duties. This Policy does not prohibit normal and appropriate gifts, hospitality, entertainment, and promotional or other similar activity expenditure, such as calendars, diaries, pens, meals, and invitations. However, the key determining factor for the appropriateness of the gift or hospitality and/or its value would be based on facts and circumstances under which such gift or hospitality is provided. The practice of giving gifts and hospitality is recognized as an established and important part of doing activities. However, it is prohibited when they are used as bribes.

Giving Gifts and Hospitality

To avoid committing a bribery offense, the gift or hospitality must be:

- Reasonable and justifiable in all the circumstances
- Intended to improve the image of MRIDA, better present its services, or establish cordial relations.

The giving or receiving gifts or hospitality is acceptable under this Policy if all the following requirements are met:

- It is not made with the intention of influencing a Third Party to obtain/retain activities advantage or to reward the provision or retention of activities or in explicit or implicit exchange for favors/benefits or for any other corrupt purpose.
- It complies with local laws and customs
- Taking into account the reason for the gift or hospitality, it is of an appropriate type and value and given at an appropriate time.
- Examples of Token Gifts: Corporate calendar, pens, bouquet of flowers, or a pack of sweets or dry fruits. If the gifts or hospitality given or received are more than a token gift or modest meal/entertainment in the ordinary course of activity, you must obtain prior written approval from your Senior Authority.

5. What is not Acceptable?

It is not acceptable for any employee of MRIDA EDUCATION AND WELFARE SOCIETY (or someone on his/her behalf) to:

- Accept an offer of a gift of any size from any Third Party which is in negotiation with, or is submitting a proposal with MRIDA.
- Give, promise to give, or offer, any payment, gift, hospitality, or advantage with the expectation or hope that an activity will be given or received or to reward an activity already given.
- Give, promise to give, or offer, any payment, gift, or hospitality to a government official, agent, or representative to "facilitate" or expedite a routine procedure.
- Accept or solicit any payment, advantage, gift, or hospitality from a Third Party that you know or suspect is being offered with the expectation that it will obtain an activity for them.
- Threaten or retaliate against another employee who has refused to commit a bribery offense or who has raised concerns under this Policy.
- Engage in any activity that might lead to a breach of this Policy

Note: The points stated above are illustrative in nature and in no way intend to limit the applicability of this Policy.

6. Governing Legislations

All national laws relating to bribery and corruption, especially such laws that are in place in jurisdictions where MRIDA has an office(s) or carries out its work, are of importance to the Organization.

7. How to Raise a Concern

Every person, to whom this policy applies, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage. The complainant may be a staff of MRIDA or an outsider. He/she should raise the complaint with the Committee, whose details and email ID are given on MRIDA's website – www.mrida.org

8. What to Do if You are a Victim of Bribery and Corruption?

It is his/her responsibility to inform/report it to their respective Seniors as soon as possible if you are offered a bribe by a third party, you are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of corruption or other unlawful activity. You must refuse to accept or make the payment from or to a third party, explain our policy against accepting or making such a payment and make it clear that the

refusal is final and non-negotiable because of this Policy. If you encounter any difficulty making this refusal, you should seek assistance from your seniors.

9. Protection

Those who refuse to accept or offer a bribe or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corrupt activities or because of reporting their suspicion in good faith that an actual or potential bribery or other corruption offense has taken place or may take place in the future. If any employee believes that he/she has suffered any such treatment, he/she should inform your Seniors immediately.

10. Who is Responsible for the Policy?

The Chief Functionaries have overall responsibility for ensuring that this Policy complies with our legal and ethical obligations and that all those under our control comply with it. Seniors at all levels are responsible for ensuring that those reporting to them are made aware of and understand this Policy, undertake training on how to implement and adhere to it and also monitor compliance with it. The Compliance/Management team is responsible for this Policy and for monitoring its use and effectiveness (and dealing with any queries on its interpretation). Management at all levels is responsible for ensuring that those reporting to them are made aware of and understand this Policy and attend regular training on how to implement and adhere to it. Every person to whom this policy applies is responsible for the success of this Policy and should ensure that he/she should use it to disclose any suspected activity or wrongdoing.