**ANTI-BRIBERY & ANTI-CORRUPTION POLICY**

**Policy Number:**

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| Prepared and Proposed By | Deepa Murali – Advisor |
| Reviewed and Recommended By | John Alex – Founder Trustee  |
| Approved By | Board of Trustees |
| Date of Approval  |  27-March-2025 |

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**Purpose**

Varshini Illam trust (“The Trust”) is committed to uphold the core values of Sensitivity, Ownership, Agility, Respect and Synergy in dealing with all stakeholders of the trust. To achieve the highest standard of ethics and integrity, the trust has adopted this policy, thereby ensuring zero tolerance approach towards bribery and corruption.

**Scope**

This policy has been developed in alignment with the trust’s code of conduct for employees, various policies (including whistle blower policy), rules and regulations adopted by the trust.

**APPLICABILITY:**

This policy is applicable to all the employees (including full-time, part-time, temporary, permanent, apprentices, trainees, etc.,) of the trust working at all levels and grades including directors, and any other person directly associated with the trust .

Further, this policy is per se applicable in all dealings/transactions entered by trust with all the service users, their parents and other care givers, government partners, associates, other partners and suppliers (“stakeholders”).

**Version Control**

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| 2.0 | 27-March-2025 | Board of Trustees |

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**OBJECTIVES:**

The key objectives of this policy are as under:

* Provide information and guidance on how to recognise and deal with bribery and corruption issues.
* Dealing with bribery and corruption issues.
* Placing adequate procedures in place to address those risks.
* Procedure to report concerns/complaints relating to bribery and corruption.

**DEFINITIONS:**

“Bribery/Bribe” means the offering, promising, giving, receiving, soliciting or accepting of a financial or other advantage, or any other thing of value, with the intention of influencing or rewarding the behaviour of a person in a position of trust to perform a public, commercial or legal function to obtain or retain a commercial advantage. It also includes accepting such advantage or value for himself or any other person.

“Corruption” means dishonest or fraudulent conduct by those in power and it typically involves bribery. It is abuse of entrusted power by those in occupying a position, for private gain.

“Complainant” under this policy means any individual or group of individuals who makes a complaint on corruption/bribery or has reasonable knowledge of such bribery/corruption has taken place.

**APPLICABILITY:**

This policy is applicable to all the employees (including full-time, part-time, temporary, permanent, apprentices, trainees, etc.,) of the trust, working at all levels and grades including directors, trustees and any other person directly associated with the trust.

Further, this policy is per se applicable in all dealings/transactions entered by trust with all the service user children, their parents and other caregivers, Government partners, associates, other partners and suppliers (“stakeholders”).

**PROHIBITIONS UNDER THIS POLICY:**

This policy strictly prohibits accepting/allowing/paying of bribes/corruption either directly or through any other party under every circumstances.

**REPORTING OF COMPLAINTS/CONCERN:**

The Trust aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken directly.

Complaints or concerns on demand or request for bribery / corruption or suspicion of non-compliance with this Policy shall be promptly reported to the Board of Trustees via whistle blower mechanism (for more information please see Whistle blower policy). The investigation and redressal process shall be the same for complaints under Whistle Blower Policy.

The company on receipt of such complaint will investigate all allegations relating to corruption and Bribery and take legal or disciplinary action as may be deemed appropriate.

**Non-Retaliation**

**Varshini Illam Trust** prohibits any form of retaliation against employees who make disclosure on under this Anti-corruption and anti-bribery policy.

**Review and Revision**

This policy would be reviewed on an annual basis or earlier based on business needs. The recommended changes would be approved by the Board of trustee. Any deviations to this policy in the interim period would be approved by the Managing Trustee.