

ANTI-CORRUPTION POLICY

SAHAYOG SOCIETY
A-240, INDIRA NAGAR, LUCKNOW





FOREWORD

SAHAYOG is committed to conducting its work with the highest standards of integrity, transparency, and accountability. In serving communities, especially the most marginalized, we recognize that any form of corruption undermines not only development efforts but also public trust.

This Anti-Corruption Policy outlines SAHAYOG's core principles, expectations, and procedures for preventing, detecting, and responding to corruption. It applies to all individuals and entities associated with our work, including employees, volunteers, partners, vendors, and governing bodies.

This updated version reflects our zero-tolerance stance and affirms our dedication to fair governance, whistleblower protection, digital grievance access, and proactive training. We encourage everyone to read this policy carefully, uphold its values, and take personal responsibility in fostering a corruption-free organizational culture.

s/d

DIRECTOR
SAHAYOG



INTRODUCTION

The Anti-Corruption Policy applies to all volunteers, employees, leaders, and the Governing Body at SAHAYOG and our partners. Everyone mentioned above is required to follow this Anti-Corruption Policy, and any infringement of this policy will be treated in accordance with the rules for follow-up and reporting described in this document.

SAHAYOG defines corruption as misuse of trusted power and means for the sake of own gain. Corruption can be exemplified as bribery, fraud, embezzlement, and extortion.

Corruption is a threat against good governance, sustainable development, democratic processes, and good business practice and contributes to social inequality. SAHAYOG is at all times responsible towards our stakeholders, cooperating partners, and donors, and prevention of corruption is crucial for the development results we wish to achieve in our work.

The purpose of this Anti-Corruption Policy is to support ethics of work which are characterized by high personal and organisational integrity, both internally and in relation to partners and donors. The regulations of SAHAYOG make clear demands to prevent and fight corruption, and we will fulfil this responsibility by promoting transparency and democratic control within our own organisation and our partner organisations both at the State and National Level.

ZERO-TOLERANCE STATEMENT (2025 Addition)

SAHAYOG maintains a Zero-Tolerance Policy toward any form of corruption, bribery, fraud, nepotism, or conflict of interest across all levels of the organization and its partnerships. No act of corruption will be overlooked, regardless of seniority or intent.

CONFLICT OF INTEREST POLICY OF SAHAYOG

Support and overview is provided throughout SAHAYOG to ensure that work is carried on according to office policy, procedure, and practice.

SAHAYOG realizes that people placed in positions of judgment or power must take extra steps to ensure that their private interests do not compete with their professional duties.

Conflict of Interest is a situation which occurs when a person has competing professional obligations and private interests.

Examples:

- Accepting personal gifts which hold the potential to change opinion/decision.



- Personal gifts above Rs.2000/- should be informed in office and if deemed necessary, deposited to office.
- Sitting in an interview selection team, when your friend or relative is being interviewed.

All staff members have a moral responsibility to report any such conflict of interest when they feel their ability to take an unbiased decision or to remain unaffected by prejudice will be compromised and thereby safeguard SAHAYOG against possible harm.

If detected and reported, all such activity will be investigated and due disciplinary action will be taken according to the office policies approved by the Governing Board.

SAFEGUARD TO PROTECT ASSETS FROM FRAUD, WASTE, ABUSE AND NEGLIGENCE POLICY

Care will be taken to prevent cases of fraud, waste, abuse, and negligence of assets. All staff members have a moral responsibility to report to the Steering Committee cases of fraud, waste, and misuse done internally by staff members or externally by our partners, vendors, and contractors.

All such information will be treated as confidential, and the name of the person filing the report will not be revealed.

Fraud – An act of intentional or reckless deceit to mislead or deceive, done internally or as misrepresentations to our partners.

Examples:

- Fraudulent credentials
- Falsifying financial records
- Fraudulent expense reimbursement
- Forgery or alteration of official documents
- Entering into unauthorized agreements on behalf of the organization

Waste – A reckless or negligent act that causes funds to be spent in a manner that was not authorized or represents significant inefficiency and needless expense.

Examples:

- Purchase of unnecessary supplies or equipment
- Purchase of goods at inflated prices
- Failure to reuse major resources or reduce waste generation

Abuse – The intentional, wrongful, or improper use or destruction of resources.

Examples:

- Misuse of finances, equipment, supplies, and/or other materials
- Failure to report damage to equipment or property



Negligence – Failure to exercise a degree of care.

Example:

- Failure to take action even when a set of standards and norms are already in place

When detected and reported, all such activity will be investigated and due disciplinary action will be taken according to the office policies approved by the Governing Board.

COMPLAINT MECHANISM

SAHAYOG will take a stand on those cases of conflict of interest which may be difficult for an individual to decide. If a volunteer, employee, leader, or member of the Steering Committee in SAHAYOG or in a partner organisation discovers a case of corruption, this must be reported through the reporting system, described below. It is also possible to make contact if there is any suspicion, rumour, or doubt as regards a case of corruption. A complaint in that case should be sent to any two Governing Body Members.

The complaint must be submitted to the Steering Committee whose e-mails are available on the SAHAYOG website. The Steering Committee shall evaluate whether an investigation committee should be appointed.

The investigating committee shall comprise of one staff member, one member of the Steering Committee who is not a member of the General Body, and one Governing Body member. The task of the Special Investigation Committee will be to ensure that persons involved in the complaint are not involved in dealing with the complaint and that those dealing with the complaint are not disqualified. The Investigation Committee will examine the complaint and draw up a report of its findings within four weeks, clearly stating decisions taken and need for further action.

It will be the task of the committee to take a decision whether the case should be dealt with further and also to inform the person who made the complaint about the result of the decisions taken.

If complaints do not involve leaders or members of the Governing Body at SAHAYOG, the complaint should, to start with, be dealt with by the Steering Committee and be reported to the Governing Body. If the complaint involves leaders in SAHAYOG, it should be dealt with by the Governing Body. If the complaint involves both leaders and the Governing Body at SAHAYOG, the General Body of SAHAYOG has the authority to appoint an impartial investigation committee.

The investigation committee can consist of a member of the Steering Committee, a controller from SAHAYOG, or external experts, e.g., the accountant of SAHAYOG.

The reported complaint will be treated confidentially and with respect for the person making the report and the person(s) or organisations about whom there is suspicion.



Anonymous Complaints Policy (2025 Addition):

SAHAYOG will accept anonymous complaints if accompanied by verifiable documentation, screenshots, photos, or credible circumstantial evidence. Frivolous or malicious anonymous submissions will be discarded.

Whistleblower Protection Clause (2025 Addition):

Whistleblowers reporting corruption in good faith will be protected from retaliation, demotion, or harassment. Their identity will be kept confidential to the extent legally possible.

Digital Complaint Mechanism (2025 Addition):

SAHAYOG shall maintain a secure, digital grievance redressal portal to receive complaints of corruption—anonynously or otherwise—and document all communications and actions taken.

VENDOR AND PARTNER COMPLIANCE DECLARATION (2025 Addition)

All external vendors, consultants, and implementing partners must sign a **Vendor Anti-Corruption Declaration** agreeing to abide by SAHAYOG's anti-bribery and integrity standards.

ANTI-CORRUPTION TRAINING AND AWARENESS (2025 Addition)

All employees, volunteers, and key partners shall undergo mandatory anti-corruption training annually. Educational materials, case studies, and reminders will be distributed quarterly.

TIMELINES FOR COMPLAINT RESOLUTION (2025 Addition)

- Complaints shall be acknowledged within 7 working days.
- Investigations must be completed and reported within 30 working days, extendable to 60 days with written justification.

POLICY REVIEW (2025 Addition)

This policy shall be reviewed every two years by the Governing Body to ensure compliance with evolving laws and operational challenges.

Reviewed and revised by- Gul Srivastava
Date- June, 2025

Approved by- Secretary, Sahayog