

# NOIDA DEAF SOCIETY

## ANTI CORRUPTION POLICY

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### Introduction

The target group of this anti-corruption policy is all Noida Deaf Society (NDS) employees. NDS employees are obligated to follow this anti-corruption policy and any breaches of this policy shall be reported through the Board Members. Corruption threatens good governance, sustainable development, democratic process, and fair business practices. Thus fighting corruption is building civil society and eliminating social injustice, which is in line with NDS's vision. NDS is entrusted with funds from a variety of donors and works to secure they are spent correctly and transparently. NDS holds a great responsibility to avoid corruption and secure that the funds are spent correctly toward donors, partners and beneficiaries. Employees of NDS are responsible for upholding and promoting the highest standards of ethical and professional conduct. Working in different areas, sometimes in complicated and difficult situations, among different languages, cultures and religions requires a lot from the employees. Knowledge, respect and common sense are some of the keywords that should be guiding the work.

The purpose of this anti-corruption policy is to support a behavior characterized by high standards of personal and organizational integrity, both internally and with other external stakeholders.

General Corruption is defined as the misuse of entrusted power for private gain. Corruption is best known as bribery, fraud, embezzlement and extortion, and some of the examples will be listed in more detail below.

Corruption has many faces. It may be in the form of money or of providing services in order to gain advantages such as favourable treatment, special protection, extra services, or reduced delays. It is important to realize that corruption is not exclusively a matter of money. To provide a person with a job, services or other favours, can in certain circumstances also be construed as corruption. Personal security and safety should never be compromised to live up to this policy.

NDS staffs are responsible for following and abiding by the rules and regulations of national and international law. It is the responsibility of NDS to inform partner organisations and other relevant stakeholders about this policy. Corruption threatens good governance, sustainable development, democratic process, and fair business practices.

To ensure correct and transparent handling of the financial resources entrusted to NDS.

**Anti-corruption principles** - The following is a listing of the principles in NDS's anti-corruption policy: 1. Conflicts of interest

2. Abuse of power and extortion

3. Fraud and Embezzlement

4. Bribery

5. Nepotism and favouritism

6. Gifts

**1. Conflict of interest** - Employees avoid any unexpedient conflicts of interest – real or potential – between personal interest and the interest of NDS. Avoiding conflicts of interest is the overall principle in fighting corruption. Conflict of interest arises from situations in which an NDS employee has a private interest that could influence his / her professional performance. Conflicts of interest can occur quite frequently and are not necessarily corrupt. It is how they are identified and managed that is important. If conflict of interest situations are not properly identified and managed, they can endanger the integrity of NDS and can result in corruption. The staff member is expected to show good judgment and when in doubt, contact the superior. In questions of conflict of interest it is important to use personal judgment and common sense to make the right decisions. The following principles are all in some ways examples of conflict of interests.

**2. Abuse of power and extortion** - Employees will not seek to influence any person or institution for private purpose by using his / her official position or offering them personal advantages. Likewise, employee will not use NDS property, facilities, services and financial resources for private purposes except when permission is given. Employee will not use any forms of extortion as a method to gain advantages. This principle implies that you should not use your professional status for private gain. Misuse could be to gain advantages that you would not have gained otherwise. Relations to suppliers must not be used to gain reduced price on e.g. computers, cars, food, consultant support or travelling for private use. Employees are also not allowed to abuse their power as a manager to get personal favours or services done by other employees.

**3. Fraud and Embezzlement** - Fraud and embezzlement are illegal and must not be used as methods to gain personal or professional advantages or property in relation to NDS, partner organisations or any other stakeholders. Fraud is defined as economic crime involving deceit, trickery or false pretences, by which someone gains advantages or funds unlawfully. Embezzlement is defined as the misappropriation of property or funds legally entrusted to someone in their formal position as an agent or guardian. Examples of fraud and embezzlement

are false documentation, lying about qualifications and abusing power/knowledge to steal cash and equipment from the office, misusing funds entrusted to us. Rules for accounting and documentation shall therefore be applied to at all times. E.g. approval of payments has to follow the Accounting Manual and approval of programmes and projects has to follow the Programme guidelines. All are expected to show honesty.

**4. Bribery** - NDS do not give or accept bribery in any form. Bribery is defined as the act of offering someone money, services or other valuables, in order to persuade him or her to do something in return. One example is that NDS do not receive bribes from potential partners to make contracts with them and we do not give bribes to our partners as a way of influencing. We base our cooperation with partner organisations on mutual ownership, accountability, participation, equality, harmonization. Bribery is illegal in all countries and harms the opportunities for fair trial and fair competition.

**5. Nepotism and favouritism** - NDS do not favour friends, family or other personal relations in recruitment, procurement, aid delivery or other situations. Nepotism is favouritism toward relatives and friends, based upon that relationship, rather than on an evaluation of ability or suitability. For instance, offering employment to a relative or friend, despite the fact that there are others who are better qualified and willing to perform the job, higher earnings, and other benefits to employees who are relatives of management. It is important to underline that if conflicts of interests are handled, it can be acceptable to hire/work with family or friends.

**6. Gifts** - NDS do not give or receive, directly or indirectly, any gift or other favour that may influence the exercise of our function, performance of duty or other ways of possibly harming NDS. Gifts are defined as but not limited to - services, travel, entertainment, material things or favours. In order to respect local traditions and conventional hospitality minor gifts are accepted. Cash gifts are never accepted. All employees are expected to show good judgment and when in doubt, contact the superior. A rule of thumb is that a gift should never influence your independent judgment and share the minor gifts that you accept with you colleagues.

**The NDS Complaint Mechanism** - NDS employees are obligated to follow this anti-corruption policy and report breaches of the policy. All corruption incidents in NDS or other incidents related to NDS activities must be reported into the complaint mechanism. If rumours about corruption or experience any other doubt can ask for advice as well. The complaint will be handled confidentially and with great respect for the complainant and the persons/ organisations the complaint is pointing at. No anonymous complaints are accepted. All incidents of corruption shall be reported in the complaint mechanism, also in the cases where investigation has taken place. Cases where personal security was at risk shall as well be reported in the complaint mechanism.