

## Navneet Foundation

### Corruption and Bribery Policy

#### 1. Purpose

Navneet Foundation is committed to the highest standards of integrity, transparency, and accountability in all its work. This policy outlines our zero-tolerance approach to corruption and bribery in any form across all levels of operation, including staff, volunteers, vendors, and partners.

#### 2. Scope

This policy applies to all employees, board members, consultants, volunteers, interns, implementing partners, and any third parties representing or working with Navneet Foundation.

#### 3. Policy Statement

Navneet Foundation prohibits:

- Offering, giving, soliciting, or receiving bribes, kickbacks, or any form of undue advantage to influence decisions.
- Use of organizational funds or resources for corrupt purposes.
- Any facilitation payments, even if common practice in certain regions.
- Any act that may be perceived as corruption or bribery, damaging the organization's reputation and integrity.

#### 4. Definitions

- **Bribery:** Offering, promising, or giving anything of value to gain an unfair advantage.
- **Corruption:** Abuse of entrusted power for private gain.
- **Facilitation Payment:** Small, unofficial payments made to secure or expedite routine actions.

#### 5. Roles and Responsibilities

- **All Employees and Representatives** must report any suspicious activity immediately.
- **Supervisors and Managers** are responsible for promoting a culture of integrity and ensuring awareness of this policy.
- **Leadership** must ensure systems are in place to prevent, detect, and respond to bribery or corruption.

## **6. Reporting and Whistleblowing**

Navneet Foundation encourages reporting of suspected corruption without fear of retaliation. Reports may be made confidentially to: [csr@navneet.com](mailto:csr@navneet.com)

## **7. Consequences of Violation**

Any breach of this policy will result in disciplinary action, including termination of employment or contract and potential legal proceedings.

## **8. Training and Awareness**

All staff and partners will receive orientation and regular training on ethical conduct, anti-bribery, and corruption prevention.

## **9. Monitoring and Review**

This policy will be reviewed annually and updated as needed to ensure its effectiveness and alignment with legal and ethical standards.

This policy has been approved by trustees of Navneet Foundation at its meeting held on 29<sup>th</sup> August, 2025.