

Anti-Bribery and Anti-Corruption Policy

1. **Introduction:** SIGMA Foundation is committed to the setting up, utmost standards for transparency and accountability in all its affairs. SIGMA Foundation strives in attaining its mission through compliance of high legal and ethical standards. SIGMA Foundation does not tolerate any form of bribery, embezzlements or corruption, and will uphold all laws countering bribery, fraud and corruption in all forms.
2. **Purpose:** The purpose of this policy is to set out the responsibilities of SIGMA Foundation and those individuals acting on its behalf in observing and upholding SIGMA Foundation's position on bribery and corruption. Every individual or group of individuals, associated to SIGMA Foundation in any form, whether the staff members, the ad-hoc staff engaged in the program activities of the organization, the consultants, Advisors, the contractors, the interns, the partner organisations and any other party with a financial or trustee-beneficiary relationship with SIGMA Foundation are expected to share this commitment. The basic objective of this statement is setting out the policy of SIGMA Foundation towards the prevention and identification of bribery and corruption and the certain procedures to be followed, if at all, any fraud is found or having an idea / impression of its existence.
3. **Scope:** This policy applies to the all members of the Governing Body, Staffs, ad-hoc staffs, Advisers, Consultants, Suppliers, Partners and Individuals acting on behalf of SIGMA Foundation, irrespective of their location.
4. **Statement:**
 - i. SIGMA Foundation will not engage in bribery or any form of unethical inducement or payment including facilitation payments and "kickbacks." All the Staff, Ad-hoc staff, Advisers, Consultants, Suppliers, Partners and Individuals acting on behalf of the SIGMA Foundation are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activities of SIGMA Foundation.
 - ii. SIGMA Foundation expects its Suppliers and Partners or Associates to act with integrity and without thought or actions involving bribery and/or corruption and will, where appropriate, include clauses to this effect in relevant contracts.
5. **Prohibited Activities:**
 - i. It is prohibited, directly or indirectly, for any staff or individual acting on behalf of SIGMA Foundation to offer, give, request or accept any bribe (i.e. gifts with mala-fide intentions, loan, payment, reward or advantage, either in cash or any other form of inducement), to or from any person or company in order to gain commercial, contractual or regulatory advantage for SIGMA Foundation, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.
 - ii. This policy requires employees and individuals acting on behalf of SIGMA Foundation:
 - a. Not to offer, promise or make any bribe or unauthorised payment or inducement of any kind to anyone;
 - b. Not to solicit projects by offering, promising or making any bribe or unofficial payment to suppliers;
 - c. Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorised by SIGMA Foundation in the ordinary course of business;
 - d. To refuse any bribe or unusual payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers;
 - e. Not to make facilitation payments. These are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement. SIGMA Foundation will not tolerate or condone such payments being made;
 - f. To report any breaches of this policy's principles or standards or of any associated
6. **Criminal Offence (as defined in IPC)**
 - i. It is a criminal offence to:

- a. Offer a bribe;
 - b. Accept a bribe;
- ii. Staffs, ad-hoc staff, advisers, consultants, suppliers, partners and any individuals including members of the Governing Body acting on behalf of SIGMA Foundation should be made aware that if they are found guilty by a court of committing bribery, embezzlement or fraudulence an individual could face prosecution as per the norms of IPC (Indian Penal Code).

7. Gifts and Hospitality:

SIGMA Foundation realises that giving and receiving of gifts and hospitality without any mala-fide intentions, or in other words, where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

8. Raising a Concern

- i. If an employee or an individual acting on behalf of SIGMA Foundation is offered a bribe, or a bribe is solicited from them, they should not agree to it unless their immediate safety is in jeopardy. Should this be the case, the employee or individual should at first instance contact the Secretary as soon as they are able to do so. The employee or individual may be required to give a written account of the events to assist with any investigation. If Secretary is involved in such an act, the individual may contact President for reporting the case.
- ii. Employees or individuals acting on behalf of SIGMA Foundation are encouraged to raise concerns about any instance of bribery or corruption at the earliest possible stage. The employee or individual raising a concern can do so in confidence and without fear of reprisals. All reports raised are taken seriously and, where appropriate, investigated. No employee or individual will be discriminated against in any way as a result of reporting a concern in good faith.
- iii. If any instance of bribery or corruption is identified; SIGMA Foundation management will take the remedial steps immediately. SIGMA Foundation has it's own system of investigating it's staff member for violation of service conduct including financial irregularities, corruption, fraud or embezzlement. If the charges are proved the delinquent may be awarded penalties depending on the gravity of misconduct.

These rules are based on the following principles:-

- a. The right of SIGMA Foundation to take appropriate disciplinary steps against any delinquent staff member, who acts in a manner conflicting with the code of conduct and prescribed rules / regulations.
 - b. At the same time the rules also recognize the right of delinquent staff member to a fair hearing and applicable and just disciplinary action.
 - c. The emphasis of disciplinary action is on prevention, justice and rehabilitation.
- 9. **Review of this Policy:** In the interests of maintaining best practice, the contents of this Anti-Fraud Policy will be reviewed by the Governing Body every three years.

CONFLICT OF INTEREST POLICY

No member of *Support for Improvement of Governance and Monitoring Advancement Foundation (SIGMA Foundation)*, or Members of the Governing Body or Staff shall derive any personal profit or gain, directly or indirectly, by reason of his or her participation with *Support for Improvement of Governance and Monitoring Advancement Foundation (SIGMA Foundation)*. This shall also include the Member's business or other nonprofit affiliations, family and/or significant other,

employer, or close associates who may stand to receive a benefit or gain. Each individual shall disclose to the Governing Body any personal interests which he or she may have in any matter pending before the organization and shall refrain from participation in any discussion or decision on such matter.

In addition, any member of *Support for Improvement of Governance and Monitoring Advancement Foundation (SIGMA Foundation)* or Members of the Governing Body or Staff shall refrain from obtaining any list of clients or donors for personal or private solicitation purposes at any time during the term of their affiliation.

Any new Member of the Governing Body shall be given this policy at the time of their election onto the Board of Directors and the policy will be reviewed annually by the board at a regularly scheduled meeting.

The purposes of this policy are to protect the integrity of *Support for Improvement of Governance and Monitoring Advancement Foundation (SIGMA Foundation)* and the organization's decision-making process as well as to enable our constituencies to have confidence in the integrity, intentions and actions of the officers, staff, board members and volunteers. To that end, we understand that this policy is not meant to supplement good judgment and all constituents should respect its spirit as well as its wording.