



Anti-Corruption Policy

Naripokkho

1. Introduction

The Anti-Corruption Policy aims to support ethics of work which is characterized by a high personal and organisational integrity, both internally and in relation to partners and donors. Naripokkho is committed 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.

Corruption is defined as the abuse of entrusted power for private gain by the Transparency International¹. Corruption can be exemplified as bribery, fraud, embezzlement and extortion.

Naripokkho will not tolerate corruption, fraud, theft, maladministration or any other dishonest activities of a similar nature. In addition, such irregular activities will be investigated and followed up by the application of all remedies available within the full extent of the law, as well as the application of appropriate prevention and detection controls.

All members and employees must abide by Naripokkho's values as well as Vision and Mission while working on Naripokkho premises, at outside locations where Naripokkho activities are being conducted, or at organization-managed events.

2. Principles

This policy applies to all corruption including fraud, embezzlement, theft, abuse of power, bribery gifts conflict of interest or suspected irregularities of this nature. Each of these are defined below:

- a. **Fraud** involves deceit, trickery or false pretences, by which someone gains advantages or funds unlawfully or makes a profit from insider/internal knowledge. These include but are not limited to; deliberate error in the preparation, evaluation, review, or audit of any Naripokkho financial statement; deliberate error in the recording and maintaining of Naripokkho's financial records; deviation from full and fair reporting of Naripokkho's financial condition, misrepresentation or false statement regarding Naripokkho's financial records, financial reports, or audit reports, other potential fraud (e.g. mail fraud, wire fraud, product replacement, inaccurate timekeeping practices, etc.).
- b. **Embezzlement** is misappropriation of property or funds legally entrusted to someone in their formal position as an agent or guardian.
- c. **Theft** of funds, supplies, or other assets of Naripokkho or of partner/affiliated organisations
- d. **Abuse of power** is when the professional status in Naripokkho or in a partner organisation is misused for private gain. Abuse of power includes the situation when someone gets personal favours or services done by employees or offers personal advantages.
- e. **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. Bribery is illegal and harms the opportunities for fair and transparent relations of cooperation and the foundation for a democratic society.

¹ <https://www.transparency.org/en/>

- f. **Honoraria/gifts** offered while speaking at events that are in Naripokkho's best interests, is considered part of an employee's normal job responsibilities. Naripokkho compensates employees for most or all of their time spent preparing for, attending, and delivering presentations approved by management. For this reason, employees should not request or negotiate a fee or receive any form of compensation from the organization hosting the speech, unless the employee first receives express authorization from Naripokkho. An individual may hold a gift of nominal value given to all speakers/facilitators at a conference as per the decision of the Executive Committee (EC) meeting held on 9 January 2016.
- g. **Conflict of Interest** constitutes any inexpedient conflicts of interest – real or potential – between personal interest, interest of Naripokkho, and the interest of our partners. This has been covered in detail in Naripokkho's Conflict of Interest Policy.

3. Scope of the Policy

This policy applies to the following:

- a. All members
- b. The Management of Naripokkho. The term Management applies to all individuals engaged in Naripokkho's decision making process including management of individual projects. This includes members/employees or committees involved in finance and administration of Naripokkho, including but not limited to:
 - i) Executive Committee (EC)
 - ii) Central Coordination Committee (CCC)
 - iii) Purchase Committee
 - iv) Management Committee
 - v) Project Coordinators and Project Directors
- c. Consultants, partner organisations, suppliers, contractors and other providers of goods or services to the Naripokkho.

It is the responsibility of all the above to report all incidents of corruption, undue privilege, fraud, theft, maladministration and false claims. All Managers/Coordinators are responsible for the detection, prevention and investigation of all corruption, undue privileges, fraud, theft, maladministration and false claims.

4. Reporting Mechanism

Naripokkho employees, members or volunteers or partners must report any information relating to potential corruption, undue privilege, act of fraud, theft, maladministration and false claims.

The government requires that Naripokkho disclose evidence of certain violations. To comply with this obligation, members and employees must report as provided below:

- a. Any potential corruption as outlined in section 2 must be reported to the President of Naripokkho directly. The President will refer the complaint to the CCC for investigation and appropriate action
- b. In case of allegation against the President or any EC member, the complaint should go to any other member of the EC

The report /complaint will be either written or verbal and submitted through post, e- mail, or telephone and cannot be anonymous.



Early reporting of potential issues allows Naripokkho to investigate the issue appropriately and in a timely manner. Reports on potential violations must be submitted within seven working days of discovery. Under these requirements, the failure to report can potentially result in disciplinary action against the individual.

Submission of complaints by individuals or organizations outside Naripokkho will follow the same procedures detailed in this section.

5. Protection of Whistle Blowers

The identity of a member or an employee/official or partner who reports suspected dishonest activity or any such activity that s/he has witnessed, will be protected.

Allegations made by members /employees/any associates which are false and made with malintent will be considered as a violation of this Policy. When such false allegations are discovered, the person who made the allegations will be subjected to organizational disciplinary action. There will be no reprisal by Management against a member or an employee who in good faith reported a violation or suspected violation.

6. Violation of Compliance with Policy

Any person(s) found to have committed corruption as defined in this Policy will be subject to immediate disciplinary action(s), up to and including the termination of employment, membership or working relationship with Naripokkho. The information and findings will also be recorded in employment and/or contractual files (in case of employee). For members action will be taken according to Naripokkho's Constitution Section 8.

7. Other Work Outside Naripokkho

Naripokkho employees must receive written permission from the respective management team before beginning any employment, business, or consulting relationship with another organization/institution while also employed at Naripokkho.

A member or an employee must obtain approval from respective Management prior to accepting to represent Naripokkho in external committees and bodies.

8. Authority

The President of Naripokkho is responsible for maintaining and updating this policy using appropriate mechanism as per organizational structure.

9. Publicity of the Policy

Naripokkho's Anti Corruption Policy will be made available to all through its organizational website.

10. Contact information

President Naripokkho

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