



Aas Health Foundation

Swayambhu Apt 2, Near Nasare Sabhagruh,
Hudkeshwar Road, Nagpur – 440034.

Anti-Bribery and Anti-Corruption Policy

Introduction

Aas Health Foundation (AHF) is committed to conducting its operations with integrity, transparency, and accountability. This Anti-Bribery and Anti-Corruption Policy is designed to prevent, detect, and address any form of bribery, corruption, or unethical practices in all activities undertaken by the organization.

Purpose

The purpose of this policy is to:

1. Prohibit bribery, corruption, and unethical practices within AHF and in its dealings with external stakeholders.
2. Ensure compliance with applicable laws and regulations related to anti-bribery and anti-corruption.
3. Promote a culture of integrity and ethical behavior across the organization.

Scope

This policy applies to all employees, volunteers, interns, contractors, board members, consultants, and third parties associated with AHF, regardless of location.

Key Principles

1. *Zero Tolerance for Bribery and Corruption*

AHF maintains a zero-tolerance approach to bribery and corruption in any form, whether direct or indirect.

2. *Compliance with Laws*

All employees and stakeholders must comply with applicable anti-bribery and anti-corruption laws, including but not limited to:

- The Prevention of Corruption Act (India)
- Foreign Corrupt Practices Act (FCPA), if applicable
- Any other relevant laws in jurisdictions where AHF operates.

3. *Integrity in Operations*

All activities, decisions, and interactions must be conducted transparently, ethically, and in the best interest of AHF and its stakeholders.

Definitions

1. *Bribery*

- Offering, giving, receiving, or soliciting something of value (e.g., money, gifts, favors, or services) to influence a decision or secure an improper advantage.

2. *Corruption*

- Abuse of power, position, or resources for personal or organizational gain.

3. *Facilitation Payments*

- Small, unofficial payments made to expedite routine actions (e.g., approvals, permits). These are prohibited under this policy.

4. *Conflict of Interest*

- Any situation where personal interests may interfere with the interests of AHF.

Prohibited Practices

1. *Bribery and Kickbacks*
 - Employees and associates must not offer, give, or receive bribes or kickbacks under any circumstances.
2. *Facilitation Payments*
 - AHF strictly prohibits facilitation payments or “grease payments” to expedite government or organizational processes.
3. *Gifts and Hospitality*
 - Employees must not accept or provide gifts, entertainment, or hospitality that could influence decisions or create a perception of bias.
 - Modest and reasonable gifts (e.g., promotional items) may be permitted if they comply with AHF’s guidelines and applicable laws.
4. *Third-Party Engagements*
 - AHF will not engage with vendors, contractors, or partners known to engage in corrupt or unethical practices.

Responsibilities

1. *Management*
 - Lead by example in maintaining ethical standards and complying with this policy.
 - Provide training and resources to ensure understanding and compliance across the organization.
2. *Employees and Stakeholders*
 - Report any suspected bribery, corruption, or unethical practices promptly.
 - Adhere to this policy and avoid conflicts of interest in their roles.
3. *Third Parties*
 - All vendors, contractors, and partners must agree to adhere to AHF’s anti-bribery and anti-corruption standards.

Reporting and Investigation

1. How to Report

- Suspected cases of bribery or corruption can be reported to the Anti-Corruption Officer (ACO) or via the following channels:
- Email: [Anti-Corruption Reporting Email]
- Phone: [Hotline Number]
- Anonymous Reporting: [Suggestion Box or Online Form, if applicable]

2. Investigation

- Reports will be thoroughly and impartially investigated.
- The confidentiality of the whistleblower will be maintained to the extent possible.

3. Action

- If allegations are substantiated, appropriate disciplinary action will be taken, which may include termination of employment or contract, and, where necessary, reporting to legal authorities.

Training and Awareness

- AHF will conduct regular training sessions for employees and stakeholders to promote awareness of anti-bribery and anti-corruption laws and practices.
- Educational materials will be provided to reinforce understanding and compliance.

Compliance and Monitoring

1. Audits

- Regular audits will be conducted to ensure compliance with this policy.

2. Policy Review

- This policy will be reviewed annually or as required by changes in laws or organizational needs.

3. *Non-Compliance*

- Non-compliance with this policy will result in disciplinary action, up to and including termination of employment or contract.

Protection Against Retaliation

- Employees and stakeholders reporting concerns in good faith will be protected from retaliation or adverse consequences.
- Retaliation against whistleblowers will result in disciplinary action.

Contact Information

Dr. Neha Bhalerao

Anti-Corruption Officer (ACO)

Aas Health Foundation

Help@ashealthfoundation.com

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Acknowledgment

All employees, contractors, and partners are required to read, understand, and acknowledge this policy.

Approved by:

Dr. Kamlesh Kakde

Secretary,

Aas Health Foundation

Date: