



**UNNATI**  
**Organisation for Development Education**

## **Anti-corruption and Bribery Policy**

Though issues related anti-corruption and bribery has been included in UNNATI's Staff Service Regulation, 1995 (last changes effective from 01/11/2021), specifically in Section d and e of Regulation No. 29 (Misconduct), this policy is designed to clearly outline UNNATI's stance on anti-corruption and bribery, as well as its approach in addressing such cases.

### **1. Purpose**

The purpose of this policy is to set out the responsibilities of UNNATI and its employees in observing and upholding the UNNATI's position on bribery and corruption and to provide information and guidance to those working for UNNATI on how to recognize and deal with bribery and corruption.

### **2. Scope**

This policy applies to all employees, contractors, consultants, volunteers, fellow and interns acting on behalf of UNNATI, irrespective of their location or role within the organisation.

### **3. Policy Statement**

UNNATI is committed to conducting all its activities in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery and corruption are prevented. UNNATI has zero tolerance for bribery and corrupt activities.

### **4. Definition of Bribery**

Bribery refers to the offering, giving, receiving, or soliciting of something of value as a means of influencing the actions of an individual holding a public or legal duty. Bribery is illegal under various anti-corruption laws.

### **5. Forms of Bribery**

Bribery may take the form of, but is not limited to:

- Cash payments
- Gifts or hospitality
- Donations to political parties
- Kickbacks or facilitation payments
- Other favours intended to exert influence

### **6. Prohibited Conduct**

All employees, contractors, consultants, volunteers, fellow and interns of UNNATI must not:

- Offer, promise, or give a bribe.
- Request, agree to receive, or accept a bribe.

- Facilitate corrupt payments or acts.

## **7. Gifts and Hospitality**

UNNATI recognizes that in some cultures and situations, the giving and receiving of gifts and hospitality is customary. However, any gift or hospitality offered, given, or received must:

- Not be intended to improperly influence a work/organisation related decision.
- Be of a reasonable value, infrequent, and not excessive.
- Be documented and reported to your reporting officer.

## **8. Facilitation Payments**

Facilitation payments, also known as "grease" payments, are unofficial payments made to speed up an administrative process. UNNATI prohibits the making of facilitation payments in any form.

## **9. Employee Responsibilities**

All employees must:

- Ensure they read, understand, and comply with this policy.
- Avoid any activity that might lead to or suggest a breach of this policy.
- Report any suspicion or instance of bribery to the Compliance Officer immediately.

## **10. Reporting Violations**

If any employee or associated party has reason to believe that an instance of bribery or corruption has occurred, or may occur, they should report the matter to reporting officer / the Director or PSCC (Policy Steering and Compliance Committee) immediately. Reports can be made anonymously if preferred.

## **11. Consequences of Violation**

Employees who violate this policy will face disciplinary action, which may result in termination of employment. The punishments outlined in Regulation No. 30 of the Staff Service Regulation, 1995, will be enforced based on the severity and nature of the violation. Violations may also result in criminal prosecution under anti-bribery laws.

## **12. Training and Communication**

UNNATI will do orientation of all employees to ensure they understand this policy and the risks associated with bribery and corruption.

## **13. Monitoring and Review**

This policy will be monitored and reviewed on a regular basis by the Director and PSCC to ensure its effectiveness.

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**Approved by:**

Binoy Acharya

Director

December 31, 2024