

UNNATI CENTRE

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SGBS Unnati Foundation **Anti- Fraud, Anti-Corruption & Anti-Bribery Policy Version.2**

SGBS Unnati Foundation is committed to:

- Conducting all of our business in an honest and ethical manner;
- A zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate;
- Developing an anti-fraud culture across the organisation;
- Seeking to minimise the opportunities for fraud, bribery and corruption;
- Ensuring that its staff are aware of the risks of fraud, bribery and corruption and understand their obligations to report any actual or suspected incidents of fraud, bribery or corruption;
- Taking all reports of fraud, bribery and corruption seriously, and investigating them proportionately and appropriately;
- Meeting its obligations to report any incidents of fraud, bribery and corruption to appropriate external authorities.

A. Who is covered by the policy?

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

B. What is a bribe?

A bribe is a financial or other advantage offered or given:

- to anyone to persuade them to or reward them for performing their duties improperly or;
- to any public official with the intention of influencing the official in the performance of his duties.

C. What is Corruption?

A dishonest act which is contrary to the interests of the organisation and in which a position of trust is abused. May involve, for example, taking or offering bribes or improper use of influence or position.

D. What is Fraud?

The act of dishonestly obtaining a material benefit by deception or other means. Fraud can include, for example, theft, deliberate falsification, concealment or misuse of documentation, or false representation.

E. Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

F. Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All those to whom this Policy applies must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

G. Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

H. Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage by writing to contactus@unnatibl.org. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

This **policy version 2** is approved by the Board of Directors in their meeting held on 28th July 2026.

