

# PARIVAAR EDUCATION SOCIETY

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**ANTI BRIBERY, ANTI CORRUPTION & WHISTLEBLOWING  
POLICY**

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**Bonogram, Bakhrahat Road,  
Kolkata-700104  
West Bengal, India**

## **1. Objective**

PARIVAAR EDUCATION SOCIETY (henceforth PARIVAAR) is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is PARIVAAR's policy to conduct all of its activities with honesty, integrity and the highest possible ethical standards and vigorously enforce its activity, wherever it operates throughout the operational area, of not engaging in bribery or corruption.

## **2. Scope and applicability**

This Policy applies to all individuals working for PARIVAAR at all levels and grades, including all employees (whether permanent, fixed-term or temporary), contractual workers, consultants, trainees, supporting staff, volunteers, interns, or any other person associated with PARIVAAR.

In this Policy, "Third Party(ies)" means any individual or organization, who / which come into contact with PARIVAAR or transact with PARIVAAR and also includes actual and potential suppliers, business contacts, consultants, intermediaries, representatives, subcontractors, agents, advisers, joint ventures and government & public bodies (including their advisers, representatives and officials).

## **3. Policy details**

A bribe is an inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage. It is illegal to directly or indirectly offer a bribe or receive a bribe.

A bribe may be anything of value and not just money -- gifts, inside information, sexual or other favors, corporate hospitality or entertainment, offering employment to a relative, payment or reimbursement of travel expenses, -- and can pass directly or through a third party. Corruption includes wrong doing on the part of an authority or those in power through means that are illegitimate, immoral or incompatible with ethical standards. Corruption often results from patronage and is associated with bribery.

## **4. Gifts and hospitality**

Employees or members of their immediate families (spouse, mother, father, son, daughter, brother, sister or any of these step- or in-law relationships, whether established by blood or marriage including common law marriage) should not provide, solicit or accept cash or its equivalent, entertainment, favors, gifts or anything of substance to or from competitors, vendors, suppliers, or others. Nothing should be accepted, nor should the employee have

any outside involvement, that could impair, or give the appearance of impairing, an employee's ability to perform his/her duties.

This Policy does not prohibit normal and appropriate gifts, hospitality, entertainment and promotional or other similar activity expenditure, such as calendars, diaries, pens, meals and invitations. However, the key determining factor for appropriateness of the gift or hospitality and/or its value would be based on facts and circumstances under which such gift or hospitality is provided.

The practice of giving gifts and hospitality is recognized as an established and important part of doing activities. However, it is prohibited when they are used as bribes. Giving gifts and hospitality. To avoid committing a bribery offence, the gift or hospitality must be:

- a. Reasonable and justifiable in all the circumstances
- b. Intended to improve the image of PARIVAAR, better present its services or establish cordial relations.

The giving or receiving gifts or hospitality is acceptable under this Policy if all the following requirements are met:

- a. It is not made with the intention of influencing a Third Party to obtain/ retain activities advantage or to reward the provision or retention of activities or in explicit or implicit exchange for favors/ benefits or for any other corrupt purpose.
- b. It complies with local laws and customs
- c. Taking into account the reason for the gift or hospitality, it is of an appropriate type and value and given at an appropriate time

Examples of Token Gifts: Corporate calendar, pens, bouquet of flowers or a pack of sweets or dry fruits.

If the gifts or hospitality given or received is more than a token gift or modest meal/ entertainment in the ordinary course of activity, you must obtain prior written approval from your Senior Authority.

## **5. What is not acceptable?**

It is not acceptable for any employee of PARIVAAR EDUCATION SOCIETY (or someone on his / her behalf) to:

- a. Accept an offer of a gift of any size from any Third Party which is in negotiation with, or is submitting a proposal with PARIVAAR.
- b. Give, promise to give or offer, any payment, gift, hospitality or advantage with the expectation or hope that a activity will be given or received or to reward a activity already given.
- c. Give, promise to give or offer, any payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- d. Accept or solicit any payment, advantage, gift or hospitality from a Third Party that you know or suspect is being offered with the expectation that it will obtain a activity for them.
- e. Threaten or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this Policy.
- f. Engage in any activity that might lead to a breach of this Policy

The points stated above are illustrative in nature and in no way intend to limit the applicability of this Policy.

## **6. What are the governing legislations?**

All national laws relating to bribery and corruption, especially such laws that are in place in jurisdictions where PARIVAAR has an office(s) or carries out its work, are of importance to the Organization

## **7. How to raise a concern**

Every person, to whom this policy applies too, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage. The complainant may be a staff of Parivaar or an outsider. He/she should raise the complaint with the Committee, whose details and email ID are given on Parivaar's website – [www.parivaar.org](http://www.parivaar.org)

## **8. What to do if you are a victim of bribery and corruption?**

It is his / her responsibility to inform / report it to their respective Seniors as soon as possible if you are offered a bribe by a third party, you are asked to make one, suspect that this may happen in the future or believe that you are a victim of another form of corruption or other unlawful activity. You must refuse to accept or make the payment from or to a third party, explain our policy against accepting or making such payment and make it clear

that the refusal is final and non-negotiable because of this Policy. If you encounter any difficulty making this refusal, you should seek assistance from your seniors.

## **9. Protection**

Those who refuse to accept or offer a bribe or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corrupt activities or because of reporting their suspicion in good faith that an actual or potential bribery or other corruption offence has taken place or may take place in the future. If any employee believes that he / she has suffered any such treatment, he / she should inform your Seniors immediately.

## **10. Who is responsible for the Policy?**

The Chief Functionaries has overall responsibility for ensuring that this Policy complies with our legal and ethical obligations and that all those under our control comply with it.

Seniors at all levels are responsible for ensuring that those reporting to them are made aware of and understand this Policy, undertake training on how to implement and adhere to it and also monitor compliance of it.

The Compliance / Management team is responsible for this Policy and for monitoring its use and effectiveness (and dealing with any queries on its interpretation). Management at all levels is responsible for ensuring that those reporting to them are made aware of and understand this Policy and attend regular training on how to implement and adhere to it.

Every person to whom this policy applies is responsible for the success of this Policy and should ensure that he / she should use it to disclose any suspected activity or wrong-doing.