

# **Anti Corruption Policy**

The target group of this anti-corruption policy is all Socio Legal Information (SLIC) employees. As SLIC employees, we are obligated to follow this anti-corruption policy and any breaches of this policy shall be reported through the SLIC complaint mechanism (specified below).

Corruption threatens good governance, sustainable development, democratic process, and fair business practices. Thus fighting corruption is building civil society and eliminating social injustice, which is in line with SLIC's vision: "To help and be advocates of oppressed, neglected and marginalized groups in India and to strengthen their possibilities of a life in dignity".

SLIC is entrusted with funds from a variety of donors and works to secure they are spent correctly and transparently. SLIC holds a great responsibility to avoid corruption and secure that the funds are spent correctly toward donors, partners and beneficiaries.

As employees of SLIC we are responsible for upholding and promoting the highest standards of ethical and professional conduct. Working in different states, sometimes in complicated and difficult situations, among different languages, cultures and religions requires a lot from the employees. Knowledge, respect and common sense are some of the keywords that should be guiding our work.

The purpose of this anti-corruption policy is to support a behavior characterized by high standards of personal and organizational integrity, both internally and with other external stakeholders (donors and partners).

## **General**

Corruption is defined as the misuse of entrusted power for private gain. Corruption is best known as bribery, fraud, embezzlement and extortion, and some of the examples will be listed in more detail below.

Corruption has many faces. It may be in the form of money or of providing services in order to gain advantages such as favorable treatment, special protection, extra services, or reduced delays. It is important to realize that corruption is not exclusively a matter of money. To provide a person with a job, services or other favors, can in certain circumstances also be construed as corruption.

Personal security and safety should never be compromised to live up to this policy.

As SLIC staff we are responsible for following and abiding by the rules and regulations of national and international law.

It is the responsibility of SLIC to inform partner organizations and other relevant stakeholders about this policy.

## **Anti-corruption principles**

The following is a listing of the principles in SLIC's anti-corruption policy:

- Conflicts of interest
- Abuse of power and extortion
- Fraud and Embezzlement
- Bribery
- Nepotism and favoritism
- Gifts

### **1. Conflict of interest**

We will avoid any unexpedient conflicts of interest – real or potential – between our personal interest and the interest of SLIC.

Avoiding conflicts of interest is the overall principle in fighting corruption. Conflict of interest arises from situations in which you as a SLIC employee have a private interest that could influence your professional performance.

Conflicts of interest can occur quite frequently and are not necessarily corrupt. It is how they are identified and managed that is important. If conflict of interest situations are not properly identified and managed, they can endanger the integrity of SLIC and can result in corruption. The staff member is expected to show good judgment and when in doubt, contact the superior. In questions of conflict of interest it is important to use personal judgment and common sense to make the right decisions.

The following principles are all in some ways examples of conflict of interests.

## **2. Abuse of power and extortion**

We will not seek to influence any person or institution for private purpose by using our official position or offering them personal advantages. Likewise, we will not use SLIC property, facilities, services and financial resources for private purposes except when permission is given. We will not use any forms of extortion as a method to gain advantages.

This principle implies that you should not use your professional status for private gain. Misuse could be to gain advantages that you would not have gained otherwise. Relations to suppliers must not be used to gain reduced price on e.g. computers, cars, food, consultant support or travelling for private use. You are also not allowed to abuse your power as a manager to get personal favors or services done by employees.

## **3. Fraud and Embezzlement**

Fraud and embezzlement are illegal and must not be used as methods to gain personal or professional advantages or property in relation to SLIC, partner organizations or any other stakeholders.

Fraud is defined as economic crime involving deceit, trickery or false pretences, by which someone gains advantages or funds unlawfully. Embezzlement is defined as the misappropriation of property or funds legally entrusted to someone in their formal position as an agent or guardian.

Examples of fraud and embezzlement are false documentation, lying about qualifications and abusing power/knowledge to steal cash and equipment from the office, misusing funds entrusted to us.

Rules for accounting and documentation shall therefore be applied to at all times. E.g. approval of payments has to follow the "Accounting Manual for SLIC" and approval of programmes and projects has to follow the "Policy Manual" (PM). All are expected to show honesty.

## **4. Bribery**

We will not give or accept bribery in any form.

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. (Bribes are also called kickbacks, hush money, sweetener, protection money, gratuity).

One example is that we do not receive bribes from potential partners to make contracts with them and we do not give bribes to our partners as a way of influencing. We base our cooperation with partner organizations on mutual ownership, accountability, participation, equality, harmonization and alignment.

Bribery is illegal in all countries and harms the opportunities for fair trial and fair competition; it creates intransparent business markets that can be hard or impossible to access.

## **5. Nepotism and favoritism**

We will not favour friends, family or other personal relations in recruitment, procurement, aid delivery or other situations.

Nepotism is favoritism toward relatives and friends, based upon that relationship, rather than on an evaluation of ability or suitability. For instance, offering employment to a relative or friend, despite the fact that there are others who are better qualified and willing to perform the job, higher earnings, and other benefits to employees who are relatives of management.

To avoid favoritism and nepotism in procurement we follow the SLIC's Procurement Manual.

It is important to underline that if conflicts of interests are handled, it can be acceptable to hire/work with family or friends.

## **6. Gifts**

We will not give or receive, directly or indirectly, any gift or other favour that may influence the exercise of our function, performance of duty or other ways of possibly harming SLIC. Gifts are defined as but not limited to: services, travel, entertainment, material things or favors. In order to respect local traditions and conventional hospitality minor gifts are accepted.

The value of an acceptable gift varies. Cash gifts are never accepted. All employees are expected to show good judgment and when in doubt, contact the superior. A rule of thumb is that a gift should never influence your independent judgment and share the minor gifts that you accept with you colleagues.

## **The SLIC Complaint Mechanism**

As SLIC employees, we are obligated to follow this anti-corruption policy and report breaches of the policy. All corruption incidents in SLIC, partner organizations or other incidents related to SLIC activities must be reported into the complaint mechanism. If you get suspicion, hear rumors about corruption or experience any other doubt you can ask for advice here as well.

You need to fill in a complaint form and sent it to [contact@hrln.org](mailto:contact@hrln.org). This e-mail box is only accessible for three employees from the Human Resource Unit in Delhi and Mumbai. On basis of the complaint, it will be considered if an investigation committee will be set up and an investigation take place.

The complaint will be handled confidentially and with great respect for the complainant and the persons/organizations the complaint is pointing at. No anonymous complaints are accepted.

All incidents of corruption shall be reported in the complaint mechanism, also in the cases where investigation has taken place regionally. Cases where personal security was at risk shall as well be reported in the complaint mechanism.