

Myna Mahila Foundation: Anti-Corruption and Bribery Policy

1. Purpose

The purpose of this Anti-Corruption and Bribery Policy (**Policy**) is to ensure that Myna Mahila Foundation (**MMF**), a not-for-profit organization working in sexual and reproductive health (**SRH**) in urban slums in Mumbai, conducts all its activities in compliance with the highest ethical standards. This Policy is designed to protect the organization's credibility, reputation, and operational integrity, ensuring that all services, particularly those involving sensitive health data of MMF beneficiaries, are delivered with transparency, fairness, and respect for the rights of our beneficiaries.

It is crucial that this Policy is strictly adhered to provide sufficient guardrails to protect MMF's credibility and more so given the vulnerable context of MMF beneficiaries, many of whom are also MMF consultants or employees.

2. Scope

This Policy applies to all employees, consultants, volunteers, contractors, third-party partners, donors, and any individuals or entities acting on behalf of MMF. It covers all activities, including, but not limited to, the provision of health care services, distribution and sale of sanitary products, conducting research, forging partnerships with external stakeholders, fundraising efforts, and procurement & liaising with vendors for internal supply needs.

3. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting anything of value as a means to influence the actions of another in a way that is unethical or illegal.
- **Corruption:** Abuse of power for personal or financial gain, including but not limited to bribery, fraud, or misappropriation of resources.
- **Facilitation Payments:** Small, unofficial payments made to secure or expedite routine governmental actions, such as processing paperwork or approvals. Such payments are considered bribes under this Policy and are strictly prohibited.

4. Policy Statement

MMF has a zero-tolerance approach to bribery and corruption. MMF is committed to conducting its operations with integrity, transparency, and fairness. MMF will not engage in, nor tolerate, any form of bribery or corruption, whether in the form of gifts, favors, payments, or other incentives.

5. Prohibited Activities

Under no circumstances should any employee, consultant, volunteer, or third party:

- Offer, give, or accept bribes, kickbacks, or any other form of improper payments to secure advantages for MMF or themselves.
- Solicit or accept gifts or benefits that could be perceived as an attempt to influence decisions or actions.
- Engage in any corrupt practice, including the misrepresentation of facts, misuse of funds, or falsification of documents or reports.
- Make facilitation payments or any payments that are not legally or ethically justified.
- Engage in fraudulent activities, including misappropriation of resources or personal gain from the organization's assets or funds.

6. Reporting and Whistleblowing

Any individual with knowledge of a potential violation of this Policy is encouraged to report it immediately. MMF will provide a secure and confidential mechanism for reporting such incidents, with a commitment to protect whistleblowers from retaliation or harm.

Reports can be made through:

- Email: manasvini@mynafoundation.com
- In-person to the designated Compliance Officer
- Anonymous report via a third-party reporting tool

MMF will thoroughly investigate all reports and take appropriate disciplinary action, which may include termination of employment or legal action where necessary.

7. Due Diligence on Third Parties

MMF will conduct due diligence on all third-party partners, including donors, contractors, and collaborators, to ensure that they share our commitment to anti-corruption and anti-bribery principles. We will not engage in partnerships with organizations or individuals known to have engaged in corrupt practices. This includes verifying their compliance with local and international anti-corruption laws.

8. Training and Awareness

To ensure understanding and compliance, all employees, volunteers, and relevant third parties will undergo mandatory training on this policy. This training will focus on identifying potential risks, understanding what constitutes bribery and corruption, and knowing how to report suspicious activities. Regular refresher courses will be conducted to keep all stakeholders informed of any updates to the policy.

9. Compliance with Laws

MMF will ensure that all activities are conducted in compliance with applicable anti-corruption laws, including the Prevention of Corruption Act, 1988 in India, and relevant international laws and regulations based on collaborations with international entities.

10. Enforcement and Consequences of Non-Compliance

Any employee, volunteer, or third party found to have violated this Policy will face disciplinary actions, which may include termination of employment, cancellation of contracts, and legal proceedings. MMF reserves the right to pursue civil and criminal action against individuals or entities engaged in corrupt or fraudulent activities.

11. Periodic Review of the Policy

This Policy will be reviewed annually to ensure its relevance and effectiveness. Adjustments will be made in response to changes in the legal, operational, or political environment in which MMF operates. All updates will be communicated to staff, volunteers, and stakeholders promptly.

12. Conclusion

The credibility of MMF and the trust of our beneficiaries, donors, and partners are of paramount importance. We are committed to maintaining the highest standards of integrity and transparency in our work, ensuring that we provide the best possible services to the women and communities we serve, free from the influence of corruption and bribery.

Signed,

On Behalf of Myna Mahila Foundation

Sweta Kanavaje

Director-Strategy and Operations

Date: **December 7, 2024**