PRAKRTIREVA SARANAM FOUNDATION

ANTI-FRAUD & ANTI-CORRUPTION POLICY

Policy Version: 1.0
Effective Date: 28 August 2026
Approval Date: 28 August 2026
Approved By: Board of Directors
Policy Owner: Board of Directors
Review Cycle: At least once every year

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1. PURPOSE

Prakrtireva Saranam Foundation is committed to conducting all its activities with honesty, integrity, transparency and accountability.

As a Section 8 organisation working for environmental and social impact, the Foundation recognises that trust is essential to its relationship with volunteers, donors, schools, institutions, partners, beneficiaries and the public.

This Anti-Fraud & Anti-Corruption Policy establishes the Foundation's standards for preventing, identifying, reporting and responding to fraud, corruption, bribery, misuse of funds, conflicts of interest and other dishonest or unethical conduct.

The Foundation follows a **zero-tolerance approach** towards fraud, bribery and corruption.

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2. SCOPE

This Policy applies to everyone acting on behalf of or representing Prakrtireva Saranam Foundation, including:

- Directors and officers
- Volunteers
- Project coordinators and team members
- Consultants and professional advisers
- Interns and trainees
- Representatives acting on behalf of the Foundation
- Contractors, vendors and service providers, where applicable
- Partners and other persons involved in Foundation activities, to the extent applicable

All persons covered by this Policy are expected to act honestly and responsibly and to protect the Foundation's resources and reputation.

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3. OUR COMMITMENT

The Foundation is committed to:

1. Maintaining honest and transparent operations.
2. Protecting Foundation funds, assets and resources.
3. Preventing bribery, corruption, fraud and financial misconduct.
4. Maintaining accurate financial and operational records.
5. Identifying and managing conflicts of interest.
6. Ensuring donations and project funds are used for legitimate Foundation purposes.
7. Encouraging individuals to report genuine concerns without fear of retaliation.
8. Taking appropriate action when misconduct is identified.
9. Complying with applicable laws, regulations and statutory requirements.

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4. WHAT IS FRAUD?

For the purpose of this Policy, **fraud** means intentional deception, concealment, misrepresentation or abuse of position intended to obtain an improper or unauthorised benefit or to cause loss to the Foundation or another person.

Fraud may include, but is not limited to:

- Falsifying or altering documents or records.
- Creating false expense claims.
- Claiming expenses that were not actually incurred.
- Misusing Foundation funds.
- Misappropriating Foundation property or assets.
- Creating false invoices, receipts or supporting documents.
- Manipulating financial or project records.
- Using Foundation resources for unauthorised personal purposes.
- Concealing material financial information.
- Providing false information to the Foundation.
- Misrepresenting Foundation activities, expenditure or impact.

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5. WHAT IS CORRUPTION?

Corruption means the misuse of entrusted authority, position or influence for an improper personal or third-party benefit.

Examples may include:

- Offering or accepting an improper payment or benefit.
- Using a position within the Foundation to obtain an unauthorised personal advantage.
- Favouring a particular supplier or person for an improper benefit.
- Manipulating a procurement or selection process.
- Concealing an improper relationship or transaction.
- Giving or receiving an improper benefit in connection with Foundation activities.

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6. BRIBERY

The Foundation prohibits bribery in all forms.

No person covered by this Policy may:

- Offer a bribe.
- Promise a bribe.
- Request a bribe.
- Accept a bribe.
- Authorise a bribe.
- Facilitate a bribe through another person.

A bribe may involve money, gifts, services, favours, employment opportunities, preferential treatment or any other benefit offered to improperly influence a decision or action.

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7. GIFTS, HOSPITALITY AND BENEFITS

Gifts or hospitality must never be used to improperly influence a decision.

Individuals acting on behalf of the Foundation must exercise reasonable judgment when offering or accepting gifts, hospitality or other benefits.

The following are prohibited:

- Cash gifts intended to influence a decision.
- Gifts offered in exchange for favourable treatment.
- Benefits that create an actual or perceived obligation.
- Gifts or hospitality that could compromise impartiality.

- Any benefit that violates applicable law or Foundation policy.

Reasonable and legitimate hospitality may be accepted where it is appropriate, modest and unrelated to an attempt to influence a decision.

Where there is uncertainty, the matter should be disclosed to the appropriate Foundation authority before accepting or offering the benefit.

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8. DONATIONS AND FUNDING

The Foundation is committed to accepting and using donations responsibly and transparently.

All donations and funding received by the Foundation must:

- Be recorded appropriately.
- Be used for legitimate Foundation purposes.
- Be handled through authorised Foundation channels.
- Be supported by appropriate documentation where applicable.
- Comply with applicable legal and regulatory requirements.

The Foundation may refuse or return donations where there are reasonable concerns regarding their source, purpose, conditions or legality.

No individual may accept Foundation donations into a personal bank account or personal payment wallet on behalf of the Foundation unless specifically authorised and legally permissible.

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9. FINANCIAL INTEGRITY

Foundation financial records must be accurate, complete and supported by appropriate documentation.

Individuals responsible for financial or project-related activities must not:

- Create false records.
- Hide transactions.
- Inflate expenses.
- Submit false reimbursement claims.
- Use Foundation funds for personal purposes.
- Misrepresent project expenditure.
- Destroy or conceal financial records improperly.

- Approve transactions that they know to be false or unauthorised.

All financial transactions should follow the Foundation’s applicable financial procedures and approval requirements.

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10. PROCUREMENT AND VENDOR DEALINGS

Where the Foundation purchases goods or services, procurement should be conducted fairly, transparently and in the Foundation’s best interests.

Individuals involved in procurement must:

- Act impartially.
- Avoid personal benefits from suppliers.
- Disclose relevant conflicts of interest.
- Avoid manipulating quotations or selection processes.
- Maintain appropriate records of significant purchases.
- Select suppliers based on legitimate and reasonable considerations.

No supplier should be given preferential treatment because of a personal relationship or improper benefit.

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11. CONFLICTS OF INTEREST

A conflict of interest may arise when a person’s personal, financial or family interests could influence—or appear to influence—their responsibilities to the Foundation.

Examples may include:

- Selecting a supplier owned by a close relative.
- Participating in a decision involving a business in which the person has a financial interest.
- Receiving a personal benefit from a Foundation transaction.
- Using Foundation information for personal gain.

Any actual, potential or perceived conflict of interest should be disclosed promptly.

The Foundation may require the individual to withdraw from the relevant decision-making process.

12. USE OF FOUNDATION PROPERTY AND RESOURCES

Foundation funds, equipment, documents, accounts, digital assets, branding, information and other resources must be used responsibly and only for authorised purposes.

Unauthorised personal use, removal, transfer, sale or misuse of Foundation property is prohibited.

This includes:

- Foundation funds
- Bank accounts
- Digital accounts
- Software and subscriptions
- Equipment
- Documents and records
- Photographs and media
- Intellectual property
- Logos and branding
- Donor and volunteer information

13. RECORD KEEPING

The Foundation will maintain appropriate records relating to its financial and operational activities.

Records should be:

- Accurate
- Complete
- Understandable
- Properly authorised
- Maintained for the required period
- Protected against unauthorised alteration or destruction

No person may knowingly create, approve or maintain a false or misleading Foundation record.

14. REPORTING SUSPECTED FRAUD OR CORRUPTION

Anyone covered by this Policy is encouraged to report suspected fraud, bribery, corruption or serious financial misconduct.

Concerns may be reported through the Foundation’s designated reporting or grievance channel.

A report may relate to:

- Suspected fraud
- Bribery or corruption
- Misuse of Foundation funds
- False reimbursement claims
- Financial irregularities
- Misappropriation of Foundation property
- Procurement manipulation
- Serious conflicts of interest
- Falsification of records
- Other dishonest conduct

A person does not need to prove misconduct before raising a genuine concern. However, reports should be made honestly and responsibly.

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15. PROTECTION AGAINST RETALIATION

The Foundation does not tolerate retaliation against a person who, in good faith:

- Reports a concern.
- Provides information during an inquiry.
- Cooperates with an investigation.
- Raises a genuine question regarding financial or ethical conduct.

Retaliation may itself constitute misconduct and may result in appropriate action.

This protection does not apply to knowingly false, malicious or deliberately misleading allegations.

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16. HANDLING OF REPORTS

When a concern is received, the Foundation may:

1. Record the concern appropriately.
2. Conduct an initial assessment.
3. Determine whether further inquiry or investigation is required.
4. Preserve relevant records and information.
5. Speak with relevant individuals where appropriate.
6. Take corrective or preventive action.
7. Refer matters to professional advisers, authorities or law-enforcement agencies where required or appropriate.

All investigations will be handled as fairly and confidentially as reasonably possible.

No person should interfere with an investigation or attempt to conceal relevant information.

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17. CONFIDENTIALITY

Information relating to a suspected fraud, corruption concern or investigation should be handled confidentially and shared only with persons who have a legitimate need to know.

Confidentiality will be maintained subject to:

- Applicable law.
- Investigation requirements.
- Reporting obligations.
- Protection of affected individuals.
- The Foundation's Data Protection & Privacy Policy.

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18. CONSEQUENCES OF MISCONDUCT

A person found to have engaged in fraud, bribery, corruption or serious financial misconduct may be subject to appropriate action.

Depending on the circumstances, action may include:

- Warning or corrective action.
- Removal from a volunteer or representative role.
- Suspension or termination of engagement.
- Recovery of improperly obtained funds or assets, where legally permissible.

- Restriction of access to Foundation resources.
- Reporting to appropriate authorities where required or appropriate.
- Legal action where appropriate.

Nothing in this Policy limits the Foundation’s obligation to comply with applicable law.

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19. RESPONSIBILITIES OF DIRECTORS

The Board of Directors is responsible for providing oversight and promoting a culture of integrity and accountability.

The Board should:

- Support implementation of this Policy.
- Ensure appropriate financial and operational controls are maintained.
- Address serious allegations appropriately.
- Review significant incidents.
- Ensure corrective measures are implemented where necessary.
- Review this Policy periodically.

Directors must act in the best interests of the Foundation and disclose relevant conflicts of interest.

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20. RESPONSIBILITIES OF VOLUNTEERS AND TEAM MEMBERS

Volunteers and team members are expected to:

- Act honestly and responsibly.
- Use Foundation resources properly.
- Follow financial and operational procedures.
- Provide accurate information and documentation.
- Disclose conflicts of interest.
- Refuse improper payments or benefits.
- Report genuine concerns.
- Cooperate with authorised inquiries.
- Protect confidential Foundation information.

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21. RESPONSIBILITIES OF PARTNERS AND SERVICE PROVIDERS

Where applicable, the Foundation expects its suppliers, consultants, contractors and partners to conduct themselves ethically and comply with relevant contractual and legal requirements.

The Foundation may take appropriate action where a partner or service provider engages in serious fraud, corruption or unethical conduct connected with Foundation activities.

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22. TRAINING AND AWARENESS

The Foundation may provide appropriate guidance, orientation or awareness activities relating to:

- Fraud prevention
- Financial integrity
- Conflicts of interest
- Ethical conduct
- Reporting mechanisms
- Responsible use of Foundation resources

Individuals are expected to familiarise themselves with the policies relevant to their role.

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23. RELATED POLICIES

This Policy should be read together with other applicable Foundation policies, including:

- Volunteer Code of Conduct
- Volunteer Reimbursement Policy
- Data Protection & Privacy Policy
- Confidentiality Policy
- Donation Policy
- Grievance Redressal Policy
- Child Safeguarding & Protection Policy
- ICC / POSH Policy
- Inclusion & Non-Discrimination Policy

Where another Foundation policy contains more specific requirements for a particular situation, the relevant policy should also be followed.

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24. COMPLIANCE WITH LAW

This Policy is intended to establish internal standards of conduct and does not replace applicable laws, regulations, statutory requirements or professional advice.

The Foundation will comply with applicable requirements under the Companies Act, 2013 and other laws and regulations relevant to its activities.

Where there is a conflict between this Policy and applicable law, the law will prevail.

The Foundation may update this Policy when there are changes in applicable legal, regulatory or operational requirements.

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25. POLICY VIOLATIONS

Any person who becomes aware of a potential violation of this Policy should raise the concern through the Foundation’s designated reporting channel.

Failure to comply with this Policy may result in appropriate corrective or disciplinary action, depending on the circumstances.

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26. REVIEW AND AMENDMENT

This Policy will be reviewed at least annually and may be reviewed earlier if:

- There is a significant change in the Foundation’s operations.
- There is a relevant change in applicable law.
- A significant fraud or corruption incident occurs.
- Internal controls require improvement.
- The Board determines that an amendment is necessary.

Any material amendment should be approved through the Foundation’s appropriate governance process.

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27. APPROVAL AND EFFECTIVE DATE

This Anti-Fraud & Anti-Corruption Policy has been adopted by the Board of Directors of Prakrtireva Saranam Foundation.

Policy Version: 1.0
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Approved By: Board of Directors
Policy Owner: Board of Directors
Next Review Date: 28 August 2027

AUTHORISED SIGNATURE

For Prakrtireva Saranam Foundation

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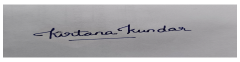
Designation: Director
Signature: 
Date: 28 August 2026
