

Bakultali Mahila Sangshad (BMS)

Anti-Corruption and Anti-Fraud Policy



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1. Introduction:

Bakultali Mahila Sangshad (BMS) management and staffs are personally and collectively motivated & committed for upholding and promoting the highest ethical and professional standards in their work. Everyone has a commitment to prevent fraud and corruption and unethical practices. The various policies and internal control & monitoring system of BMS are strong guard against occurrence of any corruption, fraud and financial irregularities.

The management of all levels has a responsibility to ensure that all personnel are aware of this Anti-Corruption Policy, understand what it means in concrete behavioral terms and conceptualize how it applies to their program context.

BMS has the zero-tolerance approach to corruption, fraud and financial irregularities. BMS personnel shall never take advantage of their position when working with communities, partners, vendors or/and other stakeholders.

2. Definition of corruption, fraud & financial irregularities:

Corruption is the "offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person".

Fraud is an intentional distortion, deceit/dishonesty, trickery and perversion of truth or breach of confidence, relating to an organization's financial, material, or human resources, assets, services and/or transactions, generally for the purpose of personal gain or benefit. Fraud is a criminal deception or the use of false representations to gain an unjust advantage.

Financial irregularities mean any administrative or financial mismanagement that comes about either by act or omission by finance/any personnel which has or would have the effect of prejudicing the fund(s) of the organization or project managed by them, by charging an unjustified item of expenditure. Key Principles: BMS' general attitude to corruption, fraud and financial irregularities are:

- Always prevent
- Never accept
- Always inform
- Always act

3. Types/Examples of Corruption and Fraudulent Activities

Financial Misappropriation/Embezzlement

- Taking bribe
- Taking commission against purchasing any goods and/or services.
- Submit/claim fake bill
- Using office money for personal purpose
- Using own money as "loan scheme" in BMS working areas.

Ethical Corruption

- Breaking Confidentiality
- Nepotism in recruitment, providing services

Hiding Information.

- Using organization's assets/resources for personal purpose
- Any activities hamper organizational reputation

4. Mitigation measures against corruption, fraud and financial irregularities

In practical implementation BMS will take the following mitigation measures:

- Early identification of possible areas of “potential corruptions” may take place.
- Promote the implementation of this Anti-corruption Policy by contributing towards the creation and maintenance of an environment that prevents corruption and unethical practice.
- Report immediately any knowledge, concerns or substantial suspicions of breaches of the Policy to her/his manager and/or senior management of the offices who is expected to take prompt investigative action.
- Uphold the highest standards of accountability, efficiency, competence, integrity and transparency in the provision of goods and services in the execution of their job.
- Strengthen downward accountability practices as a way of detecting and preventing corruption;
- Give attention to setting up/implement good financial, administrative, procurement and human resources systems/practices.
- Cooperate when requested with any investigation into alleged breaches related to this Policy.

Measures when there is cause to suspect corruption or receive complaint when corruption, fraud and/or financial irregularities are suspected or complaint received, BMS will take the following measures:

- If BMS gets any complaint of corruption, fraud activity or any unethical practice against any personnel, temporary personnel, implementing partners, consultants and volunteers during their mission with BMS, the organization shall take it immediately under investigation for prompt action.
- Any complaint against any fraud, corruption or unethical business practice will be handled in line with the BMS complaint and response mechanism.
- Engage SMT in a dialogue on how to investigate the suspected corruption / fraud / irregularity.
- The complaint will be handled with an open mind and in confidentiality. Name and contact details will not be revealed to any person outside the investigation.
- If corruption/fraud/irregularity is proved, disciplinary and/or legal actions will be taken immediately.
- If a complaint is proved malicious / malevolent, any investigation underway must be stopped immediately and disciplinary actions will be taken.



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