

Policy Summary

Anti-Bribery and Corruption Policy

Friends Affected & Infected Together in Hand (FAITH) — Lalitpur, Nepal
Adopted October 2019

POLICY COMMITMENT			
FAITH is committed to conducting all operations with honesty and integrity, safeguarding the assets for which it is responsible, and taking a zero-tolerance approach to any acts of bribery and corruption.			
Zero Tolerance approach to bribery and corruption	6 Duty areas: ownership, prevention, disclosure, investigation, protection	18 Red flag indicators to watch for	Oct 2019 Policy adopted

About this Policy

Safety of all people, transparency, good governance, sustainability, and service are FAITH's core values. This Anti-Bribery and Corruption Policy sets out the responsibilities of all members of FAITH in observing and upholding the organization's position on bribery and corruption, and provides guidance to recognize and deal with related issues.

FAITH complies fully with all national and international laws on bribery and corruption relevant to its operations, and is committed to investigating all allegations seriously.

Scope

- All employees, volunteers, interns, agents, external consultants, and third-party representatives associated with FAITH, wherever located.
- All dealings with Third Parties — clients, suppliers, partners, donors, agents, advisers, and government or public bodies.
- All financial and other advantages, including gifts, gratuities, entertainment, facilitation payments, kickbacks, loans, and hospitality.

Key Definitions

- **Bribery** — the act of offering or receiving a bribe.
- **Bribe** — any financial or other advantage offered, provided, authorized, requested, or received as a reward for improper performance of a person's function.
- **Corruption** — misuse of entrusted power for personal gain or other advantage that undermines good governance and the rule of law.
- **Advantage** — money, gifts, gratuities, entertainment, facilitation payments, kickbacks, loans, fees, hospitality, discounts, or the award of a contract, given to or from a Third Party.
- **Duress** — payment made to protect against an imminent threat to life, health, safety, or liberty.

Duties: Ownership, Prevention, Disclosure, Investigation and Resolution

Duty Area	What it Covers
Ownership	Owned and complied with by every member of FAITH, including employees, volunteers, interns, agents, consultants, and third-party representatives.
Responsibility	Senior Management ensures organization-wide compliance and training; managers ensure their teams understand the Policy; all members must read, understand, and comply with it and related policies.
Prevention	Periodic risk assessments, due diligence on Third Parties, and strict record-keeping of payments, gifts, hospitality, and expense claims.
Disclosure / Duty to Report	Members must raise concerns with a supervisor or the Disinterested Committee at the earliest stage, through open communication rather than anonymous reporting.
Investigation and Resolution	The Disinterested Committee investigates reports; internal reports are handled as Whistleblowing, external reports go through the Executive Body first.
Protection	FAITH supports anyone who raises genuine concerns in good faith and protects them from retaliation, in line with the Whistleblower (Protection) Policy.

Consequence of Non-Compliance

Any member found taking part in bribery or corruption is subject to disciplinary action, proportionate to the facts of the case, which may include:

- Verbal warning
- Written warning
- Restriction of employee activities or access to company resources
- Suspension with or without pay
- Termination of employment

Where non-compliance also violates national or international law, FAITH may refer the matter to the appropriate regulatory authority, which could lead to criminal proceedings.

Training and Communication

Training on this Policy is included in the induction process for every member of FAITH, with regular refresher training provided as needed. FAITH's zero-tolerance approach is also communicated to all Third Parties as part of its preventive action.

Actions Permitted Under the Policy

The Policy does not prohibit:

- Reasonable and bona fide travel or lodging expenses directly related to promoting or explaining FAITH's services.
- Lawful payments permitted under the written laws of a foreign country.
- Genuine extortion or duress defense, involving true extortionate demands under imminent threat of physical harm.
- Charitable contributions that align with FAITH's values and principles.

Red Flags

Members are encouraged to watch for warning signs that may indicate a bribery or corruption risk, including:

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- A Third Party with a reputation for improper business practices, or one offering unusually generous gifts or hospitality.
- Excessive commissions, unreasonably large discounts, or vaguely described consulting services.
- Transactions involving high-risk countries, shell companies, or secrecy jurisdictions.
- Government officials with a direct interest in, or insistence on using, a particular Third Party.
- Requests for upfront payment, unexpected fees, increased compensation mid-project, or payment to "overlook" legal violations.
- Misrepresentations, inconsistencies, or refusal to provide information during due diligence.

This summary is published by FAITH for transparency and accountability. It is a condensed presentation of the internal Anti-Bribery Policy (October 2019); in case of any discrepancy, the full internal policy document prevails and is available on request.