

# **Conflicts of Interest Policy**

Gram Vikas Navyuvak Mandal Laporiya(GVNML), constituted a unit comprising some senior staff and consultant for all types of documentation, the unit developed some organization policies for smooth implementation of different kind of office and field works. In this series of policies - Conflicts of Interest Policy is one that agreed by Governing Board of GVNML, on 15, May 2020. And from the date onwards the policy is effective and all staff, Board Members (while they are in GVNML campus and while doing some works related to GVNML) have to follow the Policy.

Policy statement given below:

GVNML is committed to:

Governing Board must avoid or properly manage any actual or potential conflicts of interest. A conflict of interest is broadly defined as: "any situation in which a Member's or office bearer's personal interests, or interests that they owe to another body, may (or may appear to) influence or affect the Governing Board's decision making".

Governing Board (GB) of GVNML will commit to:

- Declare any potential interest or conflict and potentially exclude themselves from the discussion and decision making on the matter.
- Act only in the interests of the development and welfare objectives of GVNML when acting, or making decisions, on GVNML's behalf. If a Member of GB is involved with another organisation which has a potential conflict with GVNML, the Member does not necessarily have to exclude themselves from all discussions as their experience with that organisation may inform and assist their role at GVNML.

In the event of an institutional conflict for a GB Member, GVNML's un-conflicted Member may authorize that conflict, provided that:

- The conflicted GB member refrain from participating in the part of the meeting at which there is discussion of any arrangement or transaction affecting that other organization.
- The conflicted GB member does not vote on that matter.
- The un-conflicted GB members consider it to be in the best interests of GVNML to authorise the conflict of interest in the circumstances.
- The usual rule fixing a quorum for conducting Board business is reduced to the number of unconflicted Members who are entitled to vote on that business.

GVNML will review this statement biannually to reflect new legal and regulatory developments and promote good practice.

(Approved by Laxman Singh, Secretary, On behalf of Governing Board, GVNML)



## **GVNML** - Documentation Unit

### Anti-Bribery Policy

Gram Vikas Navyuvak Mandal Laporiya(GVNML), constituted a unit comprising some senior staff and consultant for all types of documentation, the unit developed some organization policies for smooth implementation of different kind of office and field works. In this series of policies - Anti-Bribery Policy is one that agreed by Governing Board of GVNML, on 15, May 2020. And from the date onwards the policy is effective and all staff, Board Members (while they are in GVNML campus and while doing some works related to GVNML) have to follow the Policy. Policy statement given below:

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that our business is conducted in a socially responsible manner. Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust.

GVNML employees must not:

- Engage in any form of bribery, either directly or through any third party (such as an agent or distributor).
- Offer or give any gift or hospitality which could be regarded as illegal or improper.
- Make donations, whether in cash or kind, in support of any political parties or candidates.

GVNML employees must:

- Read, understand and comply with this policy.
- Notify your manager immediately if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

#### GVNML commits to:

- Keep financial records of payment to third parties.
- Have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- Ensure employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrong doing, will not suffer detrimental treatment.
- Ensure employees are trained on this policy on a regular basis.

GVNML will review this statement biannually to reflect new legal and regulatory developments and promote good practice.

(Approved by Laxman Singh, Secretary, On behalf of Governing Board, GVNML)



**GVNML** - Documentation Unit

#### Anti Fraud and Corruption Policy

Gram Vikas Navyuvak Mandal Laporiya(GVNML), constituted a unit comprising some senior staff and consultant for all types of documentation, the unit developed some organization policies for smooth implementation of different kind of office and field works. In this series of policies - Anti Fraud and Corruption Policy is one that agreed by Governing Board of GVNML, on 15, May 2020. And from the date onwards the policy is effective and all staff, Board Members (while they are in GVNML campus and while doing some works related to GVNML) have to follow the Policy.

Policy statement given below:

As a registered "Not for Profit Organization", GVNML must comply with Income Tax law. This includes ensuring that its assets are safeguarded and properly used to meet its objectives that meant for charitable and welfare of society.

GVNML has a 'zero tolerance' policy towards fraud, bribery and corruption. We will always investigate and seek to take disciplinary and/or legal action against those who commit, attempt to commit, or assist anyone to commit fraud or any other improper activities in our operations.

GVNML is committed to:

- Developing an anti-fraud culture across the organization. GVNML has created a culture of openness and is committed to maintaining this.
- Seeking to minimise the opportunities for fraud, bribery and corruption.
- Having effective systems, procedures and controls in place to enable the prevention and detection of fraud, corruption and bribery. GVNML will have an annual external audit.
- Ensuring that its staff are aware of the risks of fraud, bribery and corruption and understand their obligations to report any actual or suspected incidents of fraud, bribery or corruption.
- Bringing all reports of fraud, bribery and corruption to the Governing Board, and investigating them proportionately and appropriately.
- Meeting its obligations to report any incidents of fraud, bribery and corruption to appropriate external authorities including, where appropriate, the Anti Corruption Bureau.

GVNML will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

GVNML will review this policy statement biannually to reflect new legal and regulatory developments and ensure good practice.

(Approved by Laxman Singh, Secretary, On behalf of Governing Board, GVNML)