



## Anti-Corruption Policy

### 1. Introduction of RDN Nepal

Rastriya Dalit Network (RDN) Nepal is a network of Dalit NGOs working with Dalit wings of political parties, Dalit NGOs and pro-Dalit activists through rights based approach to development in Nepal. It was formed as 'Regional Dalit Network' in 2001 to address different issues like discriminative social dogmas, untouchability, social injustice, and social exclusions. Initially, this network functioned as a mass-based organization. After all, it was registered as a non-governmental organization in district administration office, Kailali and subsequently affiliated in social welfare council.

RDN Nepal is a campaign and advocacy based organization and it creates pressure to governmental and other sectoral organization so as to address the issues related to Dalit rights. Dalit's parliament is one of the forums to provide pressure to policy makers through submitting the alternative concepts and policies for the issues like reservation. It has gained success to publicize the issue of Haliyas both at national and international level. Considering its working approach, its involvement with different types of national level of organizations, individuals and professionals as well as its involvement in different influencing movements such as: 'Jana Andolan II (people's movement episode – II), Haliya movement etc, it was renamed as "Rastriya Dalit Network (RDN) Nepal" in 2006 though it was initiated as Regional Dalit Network.

### 2. Overview of Anti-Fraud Policy

The anti-fraud policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against interventions carried-out by Rastriya Dalit Network (RDN) Nepal. It is the intent of RDN Nepal to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

### 3. Scope of Policy:

This policy applies to any irregularity, or suspected irregularity, involving employees as well as shareholders, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with RDN Nepal. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to the Company.

Complaints Management Committee is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each staff of the organization will be familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of irregularity. Any irregularity that is detected or suspected must be reported immediately to the Executive Director of RDN Nepal who coordinates all investigations with the Legal Department and other affected areas, both internal and external.

#### 4. **Actions Constituting Fraud:**

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge of organizational activities
- Disclosing confidential and proprietary information to outside parties
- Disclosing to other persons securities activities engaged in or contemplated by the organization
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the Company. Exception: Gifts less than NPR 3,000 in value.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or any similar or related irregularity

#### 5. **Other Irregularities:**

Irregularities concerning an employee's moral, ethical, or behavioral conduct should be resolved by departmental management and the Employee Relations Unit of Human Resources rather than the Complaints Management Committee. If there is any question as to whether an action constitutes fraud, contact the Executive Director of RDN Nepal for guidance.

#### 6. **Investigation Responsibilities:**

The Complaints Management Committee has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates that fraudulent activities have occurred, CRM will issue reports to appropriate designated personnel and, if appropriate, to the Board of Directors through the CRM.

Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel and senior management, as will final decisions on disposition of the case.

#### 7. **Confidentiality:**

Complaints Management Committee treats all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the CRM immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act (see REPORTING PROCEDURE section below).

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the Organization from potential civil liability.

#### 8. **Authorization for Investigating Suspected Fraud:**

Members of the Investigation Unit will have:

- Free and unrestricted access to all organization records and premises, whether owned or rented; and

- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

## 9. Reporting Procedures:

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

An employee who discovers or suspects fraudulent activity will contact the Complaints Management Committee immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Investigations Unit. No information concerning the status of an investigation will be given out. The proper response to any inquiries is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.

The reporting individual should be informed of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Complaints Response Mechanism (CRM)

## 10. Termination:

If an investigation results in a recommendation to terminate an individual, the recommendation will be reviewed for approval by the designated representatives from Human Resources and the Legal Department and, if necessary, by outside counsel, before any such action is taken. The Complaints Management Committee does not have the authority to terminate an employee. The decision to terminate an employee is made by the employee's Executive Committee. Should the Complaints Response Mechanism believe the management decision inappropriate for the facts presented, the facts will be presented to executive level management for a decision.


## 11. Administration:

The Executive Director of RDN Nepal is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

### Approved By

Name: Ganesh B.K.

Position: Chairperson

Signature: 

Dated on 1<sup>st</sup> July, 2015