



*REEDS
Anti-Bribery
and
Corruption
Policy*

**RURAL EDUCATION & ECONOMIC
DEVELOPMENT SOCIETY
(REEDS) PAKISTAN**

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REEDS Anti-Bribery and Corruption Policy

1-Introduction:

Rural Education & Economic Development Society (REEDS) adheres to operate in honesty, dignity, integrity, transparency and accountability. We take a zero-tolerance approach to bribery and corruption and are committed to act professionally and expect each employee and concerned to follow the same.

Corruption is “Abuse of power for private gain” as defined by the United Nations and Rural Education & Economic Development Society (REEDS) adhere its compliance with this UN Global Program against Corruption and Transparency International.

This policy sets out our responsibilities and of those working for us, in observing and upholding our position on bribery and corruption; and provides information and guidance as how to recognize and deal with bribery and corruption issues.

1.1-Introduction from the Executive Director:

“The vision of REEDS is, integrated human development through change in attitude with promotion of honesty and harmony. We operate with a deep commitment to social and ethical principles, placing them at the core of our activities. Our policy is to conduct development and humanitarian work ensuring compliance with all applicable national laws to prevent bribery and corruption. This policy outlines our approach to combating bribery and corruption. We are dedicated to conducting our national operations with integrity and expect all employees and representatives of REEDS to familiarize themselves with and adhere to this policy.

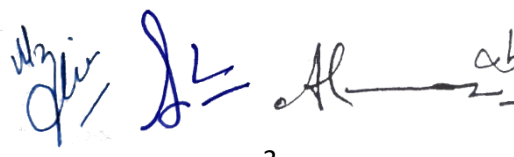

2-Commitment to Bribery Prevention:

REEDS have a zero-tolerance approach to offering or accepting bribes, and to any form of bribery and corruption. The organization is committed to carrying out its development and humanitarian activities in line with the highest ethical standards and in full compliance with the laws of Pakistan, where it operates.

3-Objective of this Policy

The purpose of this policy is to ensure REEDS employees, local partners and suppliers are vigilant in preventing bribery and corruption in their work/business dealings and to ensure that REEDS operates in a socially responsible manner. This Policy reflects the legal requirements under the key legal framework for anti-corruption in Pakistan is the "National Accountability Ordinance, 1999," which established the National Accountability Bureau (NAB). This ordinance addresses various forms of corruption, including bribery, and applies to all individuals and organizations operating in Pakistan.

NGOs must comply with this ordinance and any other related laws to avoid engaging in bribery or corruption. Here's what NGOs need to know:

3.1-Prohibition of Bribery and Corruption:

The ordinance prohibits offering, giving, or receiving bribes, whether it's in the context of business, government dealings, or any other activity. NGOs must ensure that their staff, volunteers, and associates do not engage in such practices.

3.2-Compliance with Laws:

NGOs must follow Pakistan's anti-corruption laws, which include not only the National Accountability Ordinance but also other relevant regulations that govern financial transparency, accountability, and ethical conduct.

3.3-Whistleblowing and Reporting Mechanisms:

NGOs should establish mechanisms for employees and stakeholders to report any suspected bribery or corruption without fear of retaliation. These mechanisms help maintain transparency and uphold ethical standards.

3.4-Penalties for Violations:

Violating anti-corruption laws can result in severe penalties, including imprisonment, fines, and confiscation of assets. NGOs must ensure they have proper controls and policies in place to avoid engaging in activities that could be construed as corrupt.

3.5-Training and Awareness:

NGOs should regularly train their staff on anti-corruption policies, highlighting the importance of ethical conduct and compliance with Pakistan's laws. This training helps prevent unintentional breaches and promotes a culture of integrity.

4-Scope

REEDS Anti-Bribery and Corruption Policy is mandatory for all REEDS board members, officers, directors, staff, contractors, intermediaries, suppliers, partners, volunteers or any other person working on behalf of REEDS anywhere in the country or representing internationally.

5-Principles:

5.1-Respect of human dignity

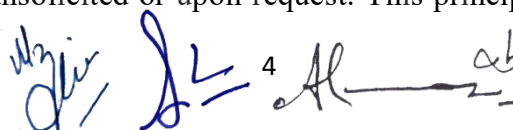
Rural Education and Economic Development Society (REEDS) acknowledges the right of every man, woman and child, to be protected against corrupt practices.

5.2-Promotion and protection of moral integrity

Rural Education and Economic Development Society (REEDS) acknowledges That all employees have the right and duty to resist corruption and to report on any corrupt act he/she has witnessed or is a victim of, if threatened, he/she should be backed by the organization or concerned department.

5.3-Promotion of transparency

Rural Education & Economic Development Society (REEDS) acknowledges that the principle of transparency should be adopted in all major decision-making processes and that activities and financial transactions should be documented. Such documentation should be made available to all relevant parties either unsolicited or upon request. This principle shall be restricted only if

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there is a valid reason. The organization will undertake to promote this principle in its relationship with different public and private sector partners.

5.4-Promotion of accountability

Rural Education & Economic Development Society (REEDS) acknowledges that the principle of accountability should be adopted in all financial transactions and major decision-making processes. The organization should actively promote this principle in its relationship with other partners promotion and protection of moral integrity

6-What happens if this policy is not upheld?

Disciplinary action may be taken against any employee who fails to comply with the Anti-Bribery and Corruption Policy, up to and including dismissal. Work will cease with agents or partners who fail to comply with the Anti-Bribery and Corruption Policy. Violating national laws that prohibit bribery is a serious criminal offence which can lead to significant civil and criminal penalties.

7-What is bribery?

Bribery involves offering, giving, receiving, or soliciting something of value as a means of influencing the action of an official in the discharge of their public or legal duties.

7.1-Offenses of Bribery:

Under the NAO, 1999, the following actions are considered bribery offenses:

7.1.1-Acceptance of Gratification:

Public office holders or employees who accept gratification (monetary or otherwise) as a reward or inducement for performing or abstaining from performing any official act.

7.1.2-Offering Bribes:

Offering or providing any form of gratification or inducement to a public office holder or employee to influence them to act in a certain way or refrain from acting.

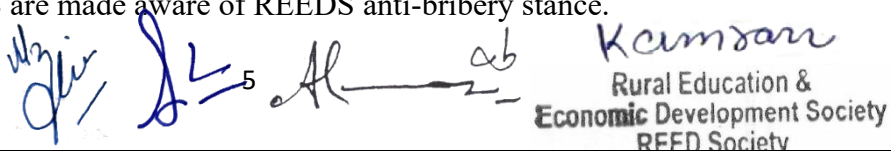
7.1.3-Corrupt Practices:

Engaging in any corrupt practice that involves dishonest, fraudulent, or unethical conduct, including bribery.

8-Implementation & Capacity Building

REEDS ensure that:

1. All personnel are informed during their induction training about REEDS donors' expectations regarding anti-bribery compliance.
2. All personnel are made aware of the severe consequences for individuals and the organization in the event of a violation of this policy
3. All staff are informed about REEDS' commitment to bribery prevention and receive comprehensive anti-bribery training upon joining the organization, with periodic refresher sessions.
4. All stakeholders including stakeholders, consultants, third parties and other entities working with REEDS are made aware of REEDS anti-bribery stance.


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5. All employees will be asked to formally accept conformance to this policy on an annual basis.

A copy of this policy is attached to all employment and consultancy agreements, and all personnel and relevant third parties must provide written acknowledgment.

9-Policy

REEDS employees or individuals representing REEDS, whether within or outside the country, must not engage in any form of bribery, either directly or through intermediaries. This encompasses any kind of bribe or kickback, including but not limited to

9.1-Facilitation payments:

Facilitation payments are a type of bribe, typically small sums paid to low-level officials to expedite a routine action to which one is normally entitled. REEDS employees are strictly prohibited from offering, paying, soliciting, or accepting facilitation payments.

9.2-Gifts and hospitality:

REEDS employees must not offer or accept any gifts or hospitality:

- That could be considered illegal or improper, or that violates the recipient's policies
- To any public officials, government representatives, politicians, or political parties
- With a value exceeding 1000 to 2000 Pak Rupees for a gift; all gifts under this amount must be reported on the gift list
- In cash
- If there's any implication or expectation of a return favour.

9.3-Political contributions:

REEDS do not contribute, whether in cash or kind, to any political organization, independent candidate, or political party, as such contributions can be perceived as a means to secure undue business advantage.

9.4-Charitable donations:

REEDS make charitable donations in accordance with its policies, and care must be taken to ensure these contributions are not used to gain undue advantage. No donation may be offered or made without prior approval from the Executive Director.



10-Working with third parties

REEDS employees must ensure that any third parties they hire do not engage in bribery or offer bribes on behalf of REEDS. All payments to third parties must be strictly for services rendered, and detailed records of these transactions must be maintained. Third parties engaged by REEDS must be given this policy and required to confirm their acceptance of its terms.

11-Responsibilities

All employees and individuals representing REEDS are required to:

- Read, understand, and follow this policy.

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- Maintain financial records and document the business reasons for any payments made to third parties.
- Declare and keep a written record of all hospitality or gifts received or given, ensuring compliance with this policy.
- Keep precise accounts of all transactions involving third parties to ensure transparency and prevent any concealment of improper payments. All transactions, whether incoming or outgoing, must go through the REEDS finance department.

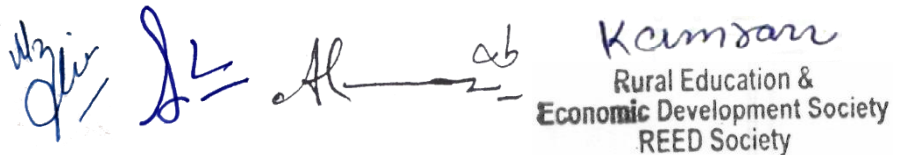
12-How to raise a concern of bribery

Anyone concerned about any form of bribery, corruption, improper action or wrongdoing by REEDS, its employees or third parties working with REEDS is required to report the matter to the Executive Director immediately. REEDS stresses that any employee with knowledge of wrongdoing should not remain silent. All matters of malpractice, improper action or wrongdoing are very serious and employees are strongly encouraged to raise such incidents or behaviors as soon as possible.

If an employee believes they are a victim of bribery or corruption, they should tell Shahid Saleem, Executive Director as soon as they are offered or asked to make a bribe or believe they are a victim of any form of unlawful activity, or contact the grievances and complaints email address below.

13-Grievance and Complaints Mechanism

REEDS vision is integrated human development through change in attitude with promotion of honesty, harmony and integrity. If you would like to report any allegations, complaints or violations of our standards, please email complaints@reedspak.org. To ensure objectivity, all information will be kept confidential all cases will be dealt with by staff members who were not involved in the case.



The image shows four handwritten signatures in blue ink. To the right of the signatures is the logo for REED Society, which includes the name 'Kamran' in a cursive font, followed by the text 'Rural Education & Economic Development Society' and 'REED Society' in a bold, sans-serif font.