

1. Objectives

- a. To restrict the scopes and opportunities of corruption in different sectors, all programs and activities of COAST Foundation. This policy will cover all COAST offices including the Principal Office, all branches, program-project offices.
- b. To ensure honesty and morality in all COAST activities. COAST practices Zero Tolerance regarding corruption and it has strong position against corruption.
- c. COAST respects all the government laws, policies, rules-regulations on bribery and corruption. COAST is committed to guide, obey by the existing government laws.

2. Methodology for preparation:

The policy has been prepared taking participation through representation of all level staff

3. Definition

Corruption: Any administrative or financial activities just for personal gain and gain implanted/done violating organization rules and policies will be treated as corruption. Providing any unlawful benefits/bribery, providing any scopes-opportunities to gain benefits to any individual, organizations for personal interest, which is also violation of organizations rules and policies, is also corruption. Intention, initiative of such activities will also be treated as corruption. Nepotism, biasness just for personal interest, activities enveloped with personal intentions, discrimination to anyone or to any organization just for personal consideration of benefits, ego will also be treated corruption. Creating an environment in favor of corruption, where the scopes, opportunities and risks of corruption can be created, where nepotism, discrimination, biasness can take place is also corruption. Individuals, groups and organizations implementing activities with COAST support will also be covered with this same policy.

4. So far identified organizational activities vulnerable to corruption and bribery

- a. Purchasing or collecting commodities and services
- b. Receiving and providing grants from and to individuals and organizations
- c. Receiving and providing gifts from and to individuals and organizations
- d. Collecting savings and loan installments and providing loans

5. Initiative to address these vulnerabilities

- a. Introduction of this Anti-Corruption and Anti-Bribery Policy
- b. Organizing a workshop to identify other serious risks
- c. Organizing special training for senior staff

6. Scope of this policy

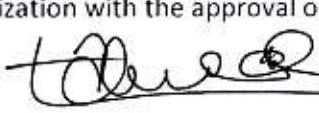
The policy will be applicable for all staff, members of EC/GC, volunteers, vendors/suppliers, consultants, program-participants.

7. Hospitalities and Gifts

Providing hospitalities and gifts to anyone or to any organizations or receiving hospitalities and gifts from anyone or from any organizations with a pure and honest intention will not be come under this policy. The following activities will not be treated corruption:

- a. Receiving or providing gifts to anyone or to any organization with the approval of the


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supervisor, but giving or receiving cash money will not get exemption.

- b. Receiving or providing certificates or gifts for attending any meeting, training, seminar etc.

8. Prohibited Activities

- a. Making any transaction, providing gift or hospitalities and giving commitment of doing against which there are possibilities of getting immoral, illegal personal benefits.
- b. Receiving gifts, service or anything against commitment of providing him or them illegal facilities or services.
- c. Receiving cash or gifts from any vendor, or any person-organization with whom/which COAST has monetary relation.
- d. Providing special facilities to any colleague taking bribe, cash or gifts
- e. Any activities that breach this policy

9. Duties and responsibilities of staff/volunteers

- a. All staff must read this policy, they should have clear understanding on this. They have to abide by this.
- b. If any corruption/bribery happens, if any environment for corruption/bribery happens, if any space is created for corruption/bribery, if there is any doubt of corruption/bribery, staff should immediately inform management. Hiding any information about corruption/bribery even knowing that is also a corruption and it will be treated as violation of this policy.
- c. Management action can be taken against those who violate this.

10. Collection and Preservation of Information

- a. Information and documentation of all transaction, bills-vouchers should be collect and preserve properly
- b. Information of gift received from outside should be preserved
- c. All accounts, bill-vouchers, information of professional communication should be preserved.

11. Reducing risks of corruption/bribery

- a. Any staff or any stakeholder can inform management about any incidence of corruption. If any environment for corruption is happened, if any space is created for corruption, if there is any doubt of corruption, COAST staff or stakeholder can communicate directly with the management.
- b. To communicate with COAST, e-mail, telephone or any other communications can be used.
- c. COAST Complaint Response Mechanism Policy, Right to Information Policy can be used for smooth implementation of this policy.

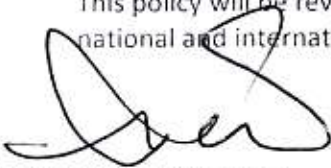
12. Protection and confidentiality of whistle blowers

- a. Here it is noted that the organization shall ensure full protection of the whistle blower. By no means the name of the whistle blower shall be disclosed but could do it only taking the approval from the whistle blower. While discuss, never squeeze the whistle blower in a way that pretend to defame or harass him/her.
- b. If any complaint is proved false, fabricated or intentionally registered then administrative action shall be taken against the whistle blower under the HR policy manual.


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13. **Approved by Executive Committee (EC), effective date and monitoring**
The review of this policy has been approved unanimously in the 115th EC meeting held on 24 June, 2022 and be effective in no delay. Director-FCC&EA will monitor the implementation progress of this policy in the organization.
14. **Orientation**
The policy will be oriented to the staff and program-participants.
15. **Review of this policy:**
This policy will be reviewed before or in June, 2025 with the significant changes made in the national and international laws, policies, human rights declaration.



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Executive Director/Member-Secretary
COAST Foundation

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