



Anti-corruption Policy of ASED HABIGONJ

PREAMBLE:

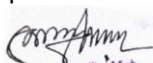
The diversion of resources or miss-use of power compromises our values and our accountability to communities around the world.

Suggestions that ASED is linked to corruption can be damaging to reputation - undermining the morale of staff and the trust and support of beneficiaries, partners, the wider public and donors. Corruption also poses legal risks both for the organization and individuals involved. We must act, and be seen to act, in a way that is honest and transparent.

This policy supports existing Partnership policies and standards (such as the Code of Conduct), reinforcing ASED's commitment to foster an organizational culture in which corruption is never acceptable. It further clarifies standards of conduct for the prevention of corruption and provides a common foundation for the development of procedures to manage ASED's corruption risk across the Partnership.

Policy statement:

1. Corruption on the part of any ASED employee, board member or volunteer (collectively "ASED Persons") or any third party (consultant, vendor, partners, etc.) in their engagement with ASED entities, is prohibited.
2. No ASED Person, or any third party acting on behalf of ASED or dealing with ASED, shall offer to pay a bribe, or pay a bribe, nor shall they solicit the payment of a bribe, or accept a bribe in conjunction with any aspect of ASED's activities.
3. Payments otherwise prohibited should be considered only if there is immediate threat to personal safety in which case the payment must be immediately reported to management and clearly identified in the accounting records as such.
4. All ASED entities will perform a corruption risk assessment to inform the development of a corruption aware workforce and foster an organizational culture in which corruption is never acceptable.
5. All ASED entities will ensure employees, board members, volunteers, and third parties that engage with ASED are made aware of the Anticorruption Policy.
6. All ASED entities will implement a "whistleblower" policy and procedures to provide employees, board members, volunteers, and third parties with a mechanism to report evidence of misconduct, including corruption, and to encourage such reporting.
7. All ASED entities will develop a corruption response plan documenting how incidents will be investigated, reported and closed.
8. Employees of ASED who commit a corrupt act, fail to report knowledge of corruption or fail to manage the risk of corruption will be subject to disciplinary action up to and including termination of employment. Members of Boards and Advisory Councils who fail to comply with this policy are subject to removal. Third parties who fail to comply with this policy will have their agreements and/or contracts with ASED terminated. ASED may also seek restitution or prosecution or other legal remedies.
9. ASED entities will immediately report all instances of suspected and actual corruption to the local governing board, where one exists (except in cases where the allegation is directed at that body), which is responsible and accountable for ensuring the incident is investigated appropriately. Also, all


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incidents of suspected and actual corruption will immediately be reported to the ASED Administrative Officer or his designee, who shall assess what other ASED groups and or parties (e.g., funding entities) should be notified.

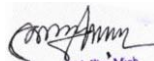
The Board delegates to the President the responsibility and authority to develop Partnership management policies as necessary to ensure the effective implementation of this policy

SCOPE:

Each entity in the ASED Partnership will ensure that it implements this policy either by referencing it directly, or by adopting its own local policy which is in accordance with this policy and any management policy that supports it.

DEFINITIONS:

Corruption is defined as 'the abuse of entrusted power for gain'. It includes practices such as bribery, fraud, extortion, collusion and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the organization's activities. This may include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage or that may result in moral pressure to receive such an advantage. Occasional minor gifts and entertainment should be handled in accordance with the applicable Conflicts of Interest Policy or other related policies.



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