POLICY ON CODE OF CONDUCT

Preamble

VisionFund India’s Code of Conduct (COC) is based on three foundational, interrelated, and complementary principles: good corporate governance; good corporate citizenship; and exemplary personal and professional conduct.

Purpose

This Code of Conduct (COC) affirms VisionFund India’s commitment to operating according to the highest ethical and legal standards, and upholding its values, vision, and mission. This COC provides guidelines on how to conduct themselves in a manner that aligns with organizational core values and mission, reflects positively on the reputation and effectiveness of the organization, and always shows dignity and respect for themselves and others, and the children and communities we engage with. This COC also ensures compliance with child protection measures, transparency, and the maintain professionalism in the organization. In summary, the COC outlines the acceptable and appropriate behavior in terms of authority, visibility, and accountability in VisionFund India's corporate culture and, as such, the COC may be used as the basis for disciplinary action.

To ensure compliance with this COC, mechanisms have been set in place to report and address any potential breaches of acceptable conduct, and to facilitate corrective action. At all times, these mechanisms will respect the right to privacy of all parties involved in any investigations.

It is our belief that in order to serve the interests of our stakeholders in perpetuity, we must build VisionFund India into an institution whose dynamism and vitality are anchored in its core values.

Scope

This policy applies to all VisionFund India personnel, which includes all employees, board members, interns, volunteers, and other appropriate partners and entities that work with VF India.

Policy Statement

1. VisionFund India is committed to conduct as an organisation, and by its personnel, that is ethical, legal, and consistent with its values and mission.
2. VisionFund India will not subscribe to, nor act as a willing party to, any wrongdoing, acts of corruption, financial impropriety, and illegal activities.
3. VisionFund India takes prompt and firm corrective action whenever, and wherever, wrongdoing is found and proved among its personnel.
4. VisionFund India personnel are expected to conduct themselves in a manner that reflects honesty, integrity, decency, and maintains the core values and the mission of the organization.
Guidelines for Good Corporate Citizenship

VisionFund India staff must constantly reflect through their actions and behaviour on the core values of VisionFund India. Good corporate citizenship is a prerequisite, and embraces the following work ethic and behavioral and official protocols.

1. Personal Conduct:

All VisionFund India staff must conduct themselves honestly and ethically, and act in the best interest of the organisation at all times. They are expected to demonstrate exemplary personal conduct through adherence to the following:

- Treat others with respect, equality, dignity, and impartiality, without any malice or prejudice;
- Avoid practices that forced or infer exclusion;
- Act in an honest, trustworthy, and ethical manner;
- Maintain appropriate office etiquette, including adherence to office working hours & adequate preparation for meetings;
- Adhering to safety, security, and health rules;
- Adhering to applicable laws and VisionFund India policies;
- Wearing appropriate attire that respects local custom and traditions;
- Good stewards of managing VisionFund India assets, funds, and other property;
- Show respect to other religious practices, belief systems, customs, cultures, and traditions.

VisionFund India staff will consciously abstain and refrain from the following unacceptable behavior, which if proven, will lead to appropriate disciplinary action:

- Any unlawful or dishonest activities;
- Financial impropriety in any form, including (but not limited to) bribery, embezzlement or fraud, etc.;
- Sexual or other unlawful harassment;
- Sexual conduct that is inconsistent with VisionFund India's core values, inappropriate, or damaging to our work and reputation in the local contexts in which we operate;
- Threatening violence or engaging in violent behavior in the workplace;
- Theft, misappropriation, or inappropriate removal or possession of any assets, funds, or other property belonging to VisionFund India, other staff, communities, or vendors;
- Engaging in biased behavior, which includes favoritism, improper preferential treatment, or allowing inappropriate and non-professional factors to influence decisions on how to engage with stakeholders, such as suppliers, vendors, contractors, and communities;
- Hiring relatives, friends, or members of one's ethnic group or caste, or region to the exclusion of other qualified persons, thus breaching WVI's recruitment policies and processes;
- Falsification of records;
- Being on VisionFund India premises, area of operation or activity under the influence of behavior-modifying substances, such as alcohol, drugs, tobacco, etc.;
- Lifestyle and attire choices that are insensitive to the local context;
- Use and/or possession of any illegal substances according to local law;
- Negligence or improper conduct leading to loss or damage of VisionFund India assets or property;
- Disrespectful conduct and insubordination;
- Possession of dangerous or unauthorized materials such as explosives or firearms;
- Prolonged absences from work without notice;
- Unauthorized and unjustified use of office resources such as vehicles, equipment, and telecommunications, including, but not limited to, office telephones, mobile phones, fax machines, internet, furniture, and VisionFund India letterhead stationery.
2. Child and adult safeguarding

- As a good corporate citizen, VisionFund India is committed to building a workplace environment and culture that promotes the health, well-being, and safety of all our stakeholders, including staff, personnel, partners, vendors, communities, and especially children beneficiaries. As such, VisionFund India has set in place guidelines and mechanisms in place to immediately identify and prevent any acts of sexual harassment and child abuse, and to facilitate appropriate disciplinary and potentially legal actions against perpetrators.
- VisionFund India defines sexual harassment between adults as any behavior that involves unwanted and unwelcome physical contact; a demand or request for sexual favors; sexually-colored remarks; use of pornography on work premises or on work assets; and any unwelcome verbal or non-verbal sexual gestures.
- VisionFund India defines child abuse as any behavior that inflicts any physical, emotional, psychological, or sexual harm on any child.
- The sexual exploitation and abuse of women and children by any VisionFund India staff or stakeholder constitute as acts of gross misconduct, and are therefore grounds for impeachment or termination of employment.
- Offering money, employment, benefits, or services in exchange for sexual favors, or subjecting any adult or child to humiliating, degrading, or exploitative practices, is strictly prohibited and is grounds for impeachment or termination of employment.
- Unethical relationships in all forms, including sexual relationships between any VisionFund India staff and clients or community beneficiaries are unacceptable and prohibited, since these are based on inherently unequal power dynamics.
- Where a VisionFund India staff develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, s/he must report such concerns via established reporting mechanisms of VisionFund India.

(Depending upon the objectionable behaviour, the child protection or Sexual Harassment policy can be invoked for any disciplinary action.)

3. Relationships with Suppliers and Customers

VisionFund India ensures that procurement practices are held to the highest standards of transparency is, with strict adherence to all systems, procedures, and policies when dealing with suppliers and customers. Accepting gifts and presents, and gratuity payments, whether in cash or in-kind from suppliers or customers, will be viewed as a severe breach of conduct.

4. Legal Compliance

VisionFund India will comply fully with all applicable laws and regulations of the Republic of India, including environmental and labour laws, and the protection of public property. The organisation will not tolerate any actions by its staff that are unlawful or may be damaging to its reputation.

5. Avoidance of Conflict of Interest

VisionFund India personnel must avoid situations in which their interest could conflict with the interest of the organisation in terms of business practices, office dealings, personal life, and community relationships.
6. **Protection of Confidential Information**

- No VisionFund India entity shall disclose or use any confidential information gained in the course of employment and/or association with the organisation for personal gain or for the advantage of other persons and/or agencies.

- No information either formally or informally shall be provided to the press, other media entities, or any external agencies without adherence to related policies.

7. **Violation of the Code of Conduct**

Any instance where employees breach the standards and guidelines described in this COC will be dealt with, as per Management’s Whistleblowers Guidelines for staff. The identity of reporters will be kept confidential.

VisionFund India (Management or Board, as appropriate) reserves the right to determine, at its sole discretion, whether an employee, volunteer, intern, board member, partner, or society member has engaged in inappropriate conduct or behavior that may warrant any disciplinary action, including impeachment or termination.