



Anti-Bribery Policy

Document ID: TTUS_POL002_ABP

Effective Date: January, 2025

Review Date: January, 2028

Based on Work Template B, 2022
Management Document
Tayyab Trust USA



Overview

NAAS Welfare Foundation Inc. is a registered 501(c)(3) nonprofit organization in USA (Tax ID: 47-5008669), DBA Tayyab Trust USA, with multiple social programs focusing on projects related to affordable healthcare, water/WASH, food security, poverty alleviation, general welfare, etc. Our mission is to empower individuals to rise out of poverty through relief and development. Equipped with 15 years of experience led by a global network of charity sector professionals, Tayyab Trust USA has uniquely crafted expertise in impact driven project management creating significant sustainable change through the use of innovative technologies, digital management tools, and community based solutions. We have partnered with various renowned national and international humanitarian organizations to assist in project development and implementation within Asia, Africa, and Americas. The organization also manages a 30-bedded hospital, Tayyab Hospital in India, with extended primary healthcare facilities nationwide. Together, we believe that our vision to beat poverty can be achieved, and we continue to strive to reach that goal through the advancement of emergency relief and human development work globally.

We take fraud and corruption practices very seriously and have internal organizational policies to prevent such dangers from occurrence. All our policies are established on the basis of zero-tolerance with strict timely action taken against those who fail to follow the policies established. Additionally, we are committed to ensure compliance with local government regulations and keep high standards for transparency and accountability. This document will explain the purpose, scope, and statement in regard to the anti-bribery policy.

Policy Purpose

This policy is created to describe the importance of anti-bribery practices, define the organizations steps and actions to address it, and designate the appropriate procedures and activities among the board and staff in response to if needed. The information mentioned in this policy frames the overall aim of the policy and any related information from this policy may also be found in other policies and procedures enforced within the organization.

Policy Scope

This policy applies to all organization members, representatives, contractors as well as extended project staff and official volunteers. The term of this policy is for three years starting January 2025 with the next review date set for January 2028. The organization may choose to revise and renew this policy prior to the next review date upon unanimous decision from the board. All policies are maintained and recorded by the organization's board and any changes in the policies must be with the authorization and approval of the board in writing.



Policy Statement

International development organizations and charities working in developing countries must avoid local corruption and fraud activities, which can be done through extensive training and preparation. It is important to assess the risk of such activities and understand how to mitigate and reduce their occurrence to keep all activities in check. Any action that leads to corruption is prohibited within the organization and may result in severe punishment.

Bribery relates to the illegal action of asking for and providing of money or favors in return to hide a criminal and/or unlawful activity conducted. Our anti-bribery policy makes sure that financial transparency and accountability is kept at a high standard within the organization, where all funds are tracked from origin to destination. When sending payments, proper screening and verification steps are taken by the board to ensure that all funds are sent only to authorized personnel, vendors, and/or organizations. Due diligence is done for each stakeholder involved where documentary evidence is gathered to assess and evaluate the risk of corruption.

Tayyab Trust USA will ensure a formal relationship with an accounting and auditing firm, and it will also have internal accounting and book-keeping mechanisms for the accountability compliance. All donations will be recorded physically and digitally, and the receipts will be issued against every single donation whether cash or via other mode of payments including donations in kind. Yearly budgets will be prepared for its expenses from January to December of each calendar year. Out of the three trustees, any two must sign the checks. For any cash transaction, the accounts office and the person receiving the funds must sign a voucher. All payments must have proper back up documents that are recorded and stored by the organization.

It is essential to clarify the scope of activities prior to their development and initiation to avoid local corruption and bribery from penetrating the financial system. Development activities must be stated correctly and documented on a timely basis to the appropriate stakeholders. Any non-development activity must also be recognized and accounted for with proper forms of proof such as billed receipts and approval letters. Any narrative, visual, and/or financial data that is not related to the activity performed may be scrutinized further in order to conclude if it relates to corruption or not. Outside financial, accounting, and/or legal assistance can be appointed to examine the matters further if necessary. It is the duty of all responsible persons within the organization to act fairly and take actions only in the best intention of the organization. Reporting of suspicious activity can be done through submitting a complaints form (annex I) to the organization's board and a timely decision will be made by the board to take any action required.

Tayyab Trust USA is registered with the Internal Revenue Service (IRS). Public reports for the organization may also be found on their website.



Annexure I – Complaints Form

COMPLAINTS FORM

CONFIDENTIAL

Date Submitted:

Submitted By:

Type of Complaint:	<input type="checkbox"/> <u>Fraudulent Activity Observed</u> <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Money Laundering <input type="checkbox"/> Bribery <input type="checkbox"/> Harassment </div> <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Sexual Exploitation <input type="checkbox"/> Discrimination <input type="checkbox"/> Other </div>
	<input type="checkbox"/> <u>Project Delivery Complaint</u> <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Misrepresentation <input type="checkbox"/> Funds Misuse <input type="checkbox"/> Misbehavior </div> <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> False Reporting <input type="checkbox"/> Personal Threat <input type="checkbox"/> Other </div> <div style="margin-top: 10px;"> <input type="checkbox"/> Other _____ _____ _____ </div>
Date of Event:	<input type="text"/>
Location of Event:	<input type="text"/>
Parties Involved:	<p>Please name the parties involved in this complaint.</p> _____ _____ _____ _____ _____ _____

Complaint Description:	<p>Please describe your complaint in detail with specific information.</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
Information Shared:	<p>Has any information related to the complaint been shared with anyone else?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, who was this information shared with and for what reason?</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
Other Information:	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>