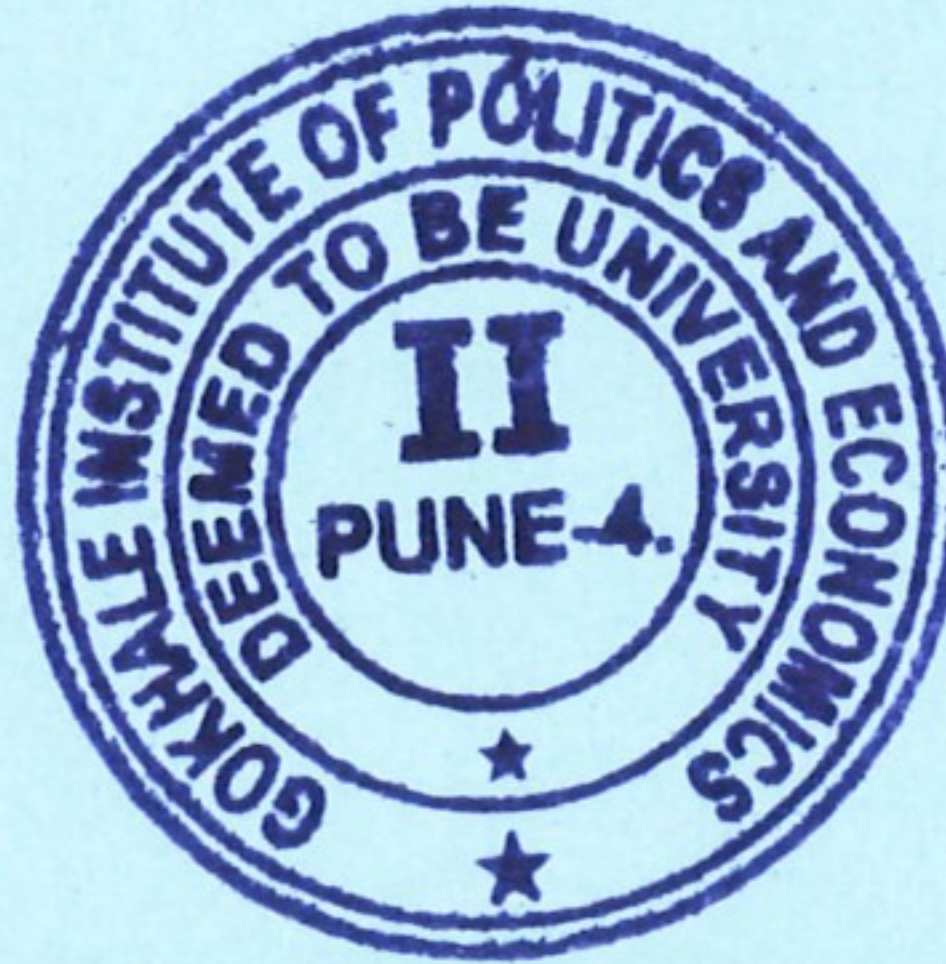


**GOKHALE INSTITUTE OF POLITICS AND ECONOMICS  
(DEEMED TO BE A UNIVERSITY)  
PUNE 411 004**

**POLICY**

**COUNTER FRAUD, BRIBERY, AND CORRUPTION**











# Gokhale Institute of Politics and Economics

(Founded by Rao Bahadur R.R. Kale, Satara)  
(Deemed to be University u/s 3 of the UGC Act, 1956)  
846, Shivajinagar, B.M.C.C. Road  
**PUNE - 411 004 (INDIA)**

## **Policy : Counter Fraud, Bribery, and Corruption**

1. **Purpose.** The purpose of this policy is to establish guidelines and procedures to prevent, detect, and address fraud, bribery, and corruption within Gokhale Institute, in accordance with Indian laws and regulations. This policy extends its purview to encompass all individuals and entities associated with Gokhale Institute of Politics and Economics, Pune hereinafter referred to as 'Gokhale Institute', inclusive of employees, volunteers, contractors, vendors, suppliers, consultants, and partners. Furthermore, it comprehensively addresses all activities and transactions conducted under the auspices of the institution, irrespective of locale or context. The institution's leadership assumes primacy in setting a precedent of ethical probity, fostering a culture of integrity, and ensuring unwavering compliance with anti-corruption edicts

## 2. **Definitions.**

- **Fraud.** Any act of deception carried out for personal gain or to cause financial loss to the institute.
- **Bribery.** The offering, giving, receiving, or soliciting of anything of value to influence the actions of an individual or entity in a position of trust.
- **Corruption.** Dishonest or illegal behavior, especially by those in power, involving bribery or improper inducements. Any misuse of entrusted authority for personal gain, encompassing acts such as bribery, extortion, embezzlement, fraud, collusion, and nepotism.
- **Conflict of Interest.** A scenario wherein personal interests or affiliations could potentially impinge upon an individual's impartiality or decision-making integrity.
- **Whistleblower.** An individual who, in good faith and adherence to established protocols, reports suspected instances of corruption or ethical malpractice.

3. **Compliance with Indian Laws.** This policy adheres to the following Indian laws and regulations related to fraud, bribery, and corruption:-



- The Prevention of Corruption Act, 1988
- The Indian Penal Code, As ammended
- The Companies Act, 2013
- The Right to Information Act, 2005
- Any other relevant legislation or regulations related to anti-fraud, anti-bribery, and anti-corruption.

4. **Prohibited Conduct.** All members of the Gokhale Institute, including employees, students, contractors, and volunteers, are prohibited from engaging in any form of fraud, bribery, or corruption. This includes but is not limited to:-

- Offering, giving, receiving, or soliciting bribes or kickbacks
- Falsifying records or documentation
- Misappropriating funds or assets
- Colluding with external parties for personal gain
- Engaging in conflicts of interest without disclosure

5. The employee shall not accept or permit any member of his/her family or any person acting on his/her behalf to accept any gift in cash or otherwise for his own benefit from any person including another employee for a work to be done in connection with the business of the Institute. Provided, that the collection of monthly subscription of membership at the rate prescribed collected by the office bearer of the Employees' Union or the Club or any benefit fund and in respect of which a due receipt is tendered, shall not amount to gift or realization of other contribution for this purpose.

- **Explanation I.** The expression 'gift' include free transport, boarding, lodging or other service or any other pecuniary advantage when provided by any person other than a near relative or personal friend having no official dealings with the employees.
- **Explanation II.** The employee shall avoid accepting lavish hospitality or frequent hospitality from any individual or company having official dealings with him or from industrial or commercial firms, organizations, or any similar bodies.

6. **Conflict of Interest Policy.** Gokhale Institute categorically prohibits employees from engaging in activities or affiliations that may provoke conflicts





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of interest, whether real or perceived. Employees are obliged to disclose any actual or potential conflicts of interest to their superiors or designated officers, with requisite measures taken to mitigate or avert such conflicts.

7. **Reporting Procedures.** Any individual who becomes aware of or suspects fraudulent, corrupt, or bribery-related activities within the institute has a duty to report such concerns promptly. Reports will be treated confidentially, and individuals making reports will be protected from retaliation (*The Institute shall promulgate a separate policy for Protection of Whistle Blowers*). Reports can be made to:-

- Vice Chancellor
- Registrar
- Dean Faculty
- Finance & Accounts Officer
- Legal Department (When Established)

8. **Investigation and Disciplinary Action.** Upon receiving a report of suspected fraud, bribery, or corruption, Gokhale Institute will conduct a thorough investigation. If misconduct is substantiated, appropriate disciplinary action will be taken in accordance with institute policies and Indian laws. This may include termination of employment, academic suspension, legal action, or other measures as deemed necessary. The vigilance team shall be constituted by the VC/Board of Management as under:-

- Convenor.
- Legal/Financial Expert.
- Registrar of the Institute
- Invitee as required

9. **Complaints against Statutory Appointments.** Whenever there are allegations against officers holding statutory positions, the complaint shall be reviewed by the Board of Management and further action shall be taken as resolved by the Board.

10. **Conclusion.** Gokhale Institute is committed to maintaining the highest standards of integrity, transparency, and accountability. By adhering to this



policy and Indian laws, we strive to create a culture of trust and ethical conduct within our institution.



  
Col Kapil Jodh  
Registrar