

Anti-Fraud Policy

1. Purpose

Swarga Foundation is committed to the highest standards of integrity, transparency, and accountability. This Anti-Fraud Policy aims to prevent, detect, and address fraud or fraudulent activities in all operations of the Foundation.

2. Scope

This policy applies to all Trustees, employees, volunteers, interns, consultants, partners, vendors, and any other individuals associated with Swarga Foundation.

3. Definition of Fraud

Fraud includes, but is not limited to:

- Misappropriation or misuse of funds, assets, or resources
- Falsification of records, reports, or documents
- Unauthorized use of property, data, or intellectual assets
- Bribery, corruption, or acceptance of illegal gratification
- Conflict-related financial gain or abuse of position

4. Zero Tolerance Approach

Swarga Foundation follows a **zero-tolerance policy** towards fraud. Any confirmed fraudulent activity will result in strict disciplinary and legal action.

5. Prevention Measures

- Strong internal controls and approval mechanisms
- Segregation of duties in financial and administrative functions
- Periodic audits and reviews

6. Reporting of Fraud / Whistleblowing

Suspected or actual fraud may be reported confidentially through:

- Email or written complaint to the Management or Board
- Complaint Box

The identity of the complainant shall be protected, and no retaliation shall be permitted.

7. Investigation Process

All reported cases will be reviewed by the designated authority or committee. Investigations will be conducted fairly, confidentially, and promptly.

8. Disciplinary Action

If fraud is established, appropriate disciplinary action will be taken, which may include termination of association, recovery of losses, and legal proceedings.

9. Record Maintenance

All fraud-related complaints and actions taken shall be properly documented and retained as per statutory requirements.