



PRASHANTI CANCER CARE MISSION

Code of Conduct Policy

Policy Effective Date: / /

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Revision History

Ver No.	Change Description	Prepared By	Reviewed By	Approved By	Date
01	New Policy	Mr. Aditya Kamthe, HR and Manager	Ms. Laleh Busheri, CEO	Dr. C.B. Koppiker, Managing Trustee	01/12/2024





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1. Objective

Prashanti Cancer Care Mission recognizes the need to establish a Code of Conduct policy for its Trustees, employees and associates to define the way organisation relationships, official dealings, social behaviour and goodwill needs to be maintained within and outside of office premises.

2. Scope and Applicability

This policy covers all Trustees, employees across levels and hierarchy in the organization.

All Trustees and employees:

1. Permanent
2. Part-time
3. Contract
4. Temporary

Also the employees of:

1. Partners
2. Vendors





3. Definition/Glossary

Term / Abbreviation	Definition / Expansion
Organization	Prashanti Cancer Care Mission
Trustee	Organization Trustee Member as of 30th Nov 2024 (As per Trust Deed and latest change report)
Employees	Employees as of 30th Nov 2024
Associates	Outsourced organizations attached with Prashanti Cancer Care Mission
CEO	Chief Executive Officer as of 30th Nov 2024
Reporting Manager	Immediate reporting manager to the employee as of 30th Nov 2024, mentioned in Offer letter of employee
HR	Human Resource Manager as of 30th Nov 2024





4. Policy/Process

4.1. Introduction:

This Code of Conduct outlines the ethical principles and standards of behaviour expected from all members of Prashanti Cancer Care Mission, including Trustees, staff, volunteers, and beneficiaries, in the execution of our charitable activities, ensuring transparency, accountability, and adherence to Indian laws and regulations.

4.2. Core Values:

- **Integrity:** Acting with honesty, fairness, and ethical conduct in all interactions and decisions.
- **Transparency:** Openly communicating information related to our operations, finances, and activities to stakeholders.
- **Accountability:** Taking responsibility for our actions and decisions and being open to feedback and scrutiny.
- **Impartiality:** Providing services and support without discrimination based on caste, religion, gender, or any other protected characteristic.
- **Beneficiary Focus:** Prioritizing the needs and well-being of our beneficiaries in all activities.

4.3. Conduct Standards

4.3.1 Financial Management:

- **Proper Record Keeping:** Maintaining accurate and detailed financial records, including receipts, expenditure vouchers, and donor information, adhering to relevant accounting standards.
- **Conflict of Interest:** Disclosing any potential conflicts of interest related to personal financial gains and taking necessary steps to avoid them.





- **Fund Usage:** Utilizing funds solely for the intended charitable and research purposes, avoiding unnecessary expenses, and ensuring efficient allocation of resources.
- **Auditing:** Complying with mandatory audits and providing transparent access to financial statements for review by stakeholders.

4.3.2 Operational Conduct:

- **Compliance with Laws:** Adhering to all applicable Indian laws, regulations, and government guidelines related to charitable activities.
- **Donor Transparency:** Providing clear information to donors regarding the purpose and usage of their contributions.
- **Beneficiary Engagement:** Actively involving beneficiaries in decision-making processes where appropriate and seeking their feedback on program effectiveness.
- **Data Privacy:** Protecting the confidentiality of beneficiary information and adhering to data privacy regulations. Non-Disclosure Agreement (NDA) mentioned in the offer letter of the employment.

4.3.3 Professional Behaviour:

- **Respectful Communication:** Maintaining respectful and courteous communication with beneficiaries, donors, partners, and colleagues.
- **Anti-Harassment Policy:** Prohibiting any form of harassment, discrimination, or bullying within the organization. Anti-Sexual harassment policy adherence as per the POSH policy
- **Confidentiality:** Maintaining confidentiality regarding sensitive information related to beneficiaries and internal operations.
- **Reporting Violations:** Reporting any suspected violations of this Code of Conduct to the designated authority immediately.
- **Acts subversive of good conduct and discipline:** Acts like insubordination, gross negligence, corruption, fraud, forgery, misappropriation, etc. to be prohibited or else would warrant strong disciplinary action from the organization.





4.3.4 Conflict of Interest:

An employee of Prashanti Cancer Care Mission shall not engage in any business, relationship or activity, which might detrimentally conflict with the interest of Prashanti Cancer Care Mission. A conflict of interest, actual or potential, may arise where directly or indirectly: (a) an employee of Prashanti Cancer Care Mission engages in a business relationship or activity with anyone who is party to a transaction with his Organisation, (b) an employee is in a position to derive a personal benefit or a benefit to any of his relatives by making or influencing decisions relating to any transaction, and (c) an independent judgment of the Organisation's best interest cannot be exercised.

The main areas of such actual or potential conflicts of interest would include the following:

- An employee of Prashanti Cancer Care Mission conducting business on behalf of the Organisation or being in a position to influence a decision with regard to Organisation's business with a supplier or customer of which his relative is a principal, officer or representative, resulting in a benefit to him or his relative.
- Award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of an employee of Prashanti Cancer Care Mission where such an individual is in a position to influence the decision with regard to such benefits.
- Acceptance of gifts, donations, and/or hospitality on behalf of the organisation beyond the customary level from existing or potential suppliers, customers or other third parties which have business dealings with the Organisation.

Notwithstanding that such or other instances of conflict of interest exist due to any historical reasons, adequate and full disclosure by the interested employees should be made to the organisation's management. It is also incumbent upon every employee to make a full disclosure of any interest which the employee or the employee's immediate family, which would include parents, spouse and children, may have in a organisation or firm which is a supplier, customer, distributor of or has other business dealings with his Organisation.

Every employee who is required to make a disclosure as mentioned above shall do so, in writing, to his immediate superior who shall forward the information along with his comments to the person designated for this purpose by the head of the organisation who in turn will place it before the head of the organisation and/or





the Board of Directors and upon a decision being taken in the matter, the employee concerned will be required to take necessary action as advised to resolve / avoid the conflict.

If an employee fails to make a disclosure as required herein and the management of its own accord becomes aware of an instance of conflict of interest that ought to have been disclosed by the employee, the management will take a serious view of the matter and consider suitable disciplinary action against the employee, including termination of employment and recovery of any damages.

4.3.5 Grievance and Complaint Mechanism:

- **Reporting:** Any grievance or false/misconduct to be reported to the Reporting manager, HR, CEO or the Managing Trustee in written, through mail.
- **General grievance to be reported to the Reporting Manager and HR through mail**
- Grievance and complaint related to ethical, legal and financial issues to be informed and managed by the management (CEO and Managing Trustee). Behavioural grievances to be addressed by the HR and then to the management for resolution.
- All grievances and complaints to be registered and addressed in discreet/non-discreet manner considering the nature of the incident. Adherence to Whistle blower policy in case of discreet matters.
- Management to address and resolve the issue in compliance with organisational rules and regulations and register the same in the resolution records.
- Escalation matrix to be followed starting from Reporting Manager/HR → CEO → Managing Trustee

4.3.6 Confidentiality on Salary and Compensation

Employees of Prashanti Cancer Care Mission shall not disclose their compensation package to anyone nor shall be permitted to discuss the compensation of any other employees to others.

Failure to adhere to the Code could attract the most severe consequences including termination of employment.





4.3.7 Protecting Organisation Assets

The assets of Prashanti Cancer Care Mission should not be misused but employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as systems, facilities, materials, and resources as well as intangible assets such as proprietary information, relationships with stakeholders and suppliers, etc.

4.3.8 Citizenship

An employee of Prashanti Cancer Care Mission shall in his private life be free to pursue an active role in civic or political affairs as long as it does not adversely affect the business or interests of the organisation.

4.3.9 Integrity of Data Furnished

Every employee of Prashanti Cancer Care Mission shall always ensure, the integrity of data or information furnished by him to the Organisation. Non-Disclosure Agreement policy to be adhered as per the Offer Letter.

Furnishing wrong information could attract the most severe consequences including termination of employment.

4.3.10 Health, Safety and Environment

Prashanti Cancer Care Mission shall strive to provide a safe and healthy working environment and comply with the Occupational Health and Safety Policy, in the conduct of its organisation affairs, with all regulations regarding the preservation of the environment of the territory it operates in.





5. Non-Compliance and Consequence

Please find below the reasons which can lead to Termination of Employment. This list is non-exhaustive

1. Gross misconduct or behaviour which may result in disrepute to the employer:
 1. Misuse of office premises
 2. Misuse of assets made available for work
 3. Wilful insubordination or disobedience, whether alone or in conjunction with another or others, or of any lawful or reasonable order of a superior. The order of the superior should normally be in writing.
 4. Threatening, abusing or assaulting any superior or co-worker
 5. Drunkenness, fighting or riotous, disorderly or indecent behaviours while on duty at the place of work.
 6. Causing wilful damage to work in progress or to property of the employer.
 7. Conviction in any Court of Law for any criminal offence involving moral turpitude
 8. Betting, Gambling and Money lending business inside office premises
 9. Preaching of or inciting to violence.
 10. Refusal to accept any charge-sheet or order or notice communicated in writing.
 11. Acts like insubordination, gross negligence, corruption, fraud, forgery and misappropriation,
 12. Disclosing to any unauthorized person of any confidential information in regard to the working or process of the establishment which may come into the possession of the workman in the course of his work or even after exiting employment
 13. Failure of Background check of Employment, Education qualifications
 14. Habitual late attendance and habitual absence without leave or without sufficient cause.





15. Continuous absence without information and without satisfactory cause for more than two days as per the policy of Prashanti Cancer Care Mission
16. Habitual neglect of work.
17. Habitual indiscipline.

2. Any other reasons depending on the position occupied by the employee
 1. Failure to report any of the reasons mentioned above with respect to his / her reporting team members

6. Review and Updates

- **Regular Review:** This Code of Conduct will be reviewed by the management and the HR and updated periodically to reflect changing legal requirements and organizational needs.

7. Access:

- **Online and Offline Availability:** This Code of Conduct will be readily accessible online and offline (print) to all members of the Trust, employees, employees related to associate partners, vendors, suppliers etc.

Nalini Bhushe

