

**CODE OF CONDUCT (THE CODE)**  
**INDIAN CANCER SOCIETY (ICS)**

**1. Introduction to the Code**

The Indian Cancer Society (ICS) enjoys a reputation of conducting its activities ethically and with integrity and in compliance with the laws and regulations of the Country and the States in which we operate and always keeping the interests of those we serve upper most in our minds.

The Indian Cancer Society has adopted this written code which sets forth our fundamental principles of conducting all our activities and it is expected that all employees, volunteers and persons connected with the Indian Cancer Society comply faithfully with the spirit as well as the letter of the code. The Memorandum of Association and Rules and Regulations and other policies of the Indian Cancer Society shall be a part of this code and should be complied with in the same spirit.

**2. Applicability of the Code**

1. The code is applicable to the staff, Individuals, affiliate entities, Associates ( Associates means and include any person connected with the organization in any manner whatsoever) and with a fiduciary obligation to the Indian Cancer Society including all Branches, members of the NMC, all Trustees and Volunteers associated with the ICS in any manner whatsoever.
2. The purpose of the code is to provide guidance to everyone associated with the ICS and provide evidence of the Indian Cancer Society's commitment to the ethical conduct of all Indian Cancer Society's activities devoid of any personal conflict of interest and that all persons discharge their duties in a manner that promotes and preserves public trust and confidence in the integrity of the Indian Cancer Society.
3. All persons must respect and comply with the ICS policies and regulations, observe high standards of conduct and participate in establishing and maintaining such high standards.
4. Adverse consequences, involving employee termination or a volunteer from his or her position or cessation of any relationship with the ICS can result from failure to comply with the code.

### **3. Policies Governing Ethical Conduct**

- A. Associates shall act honestly and ethically.
- B. Associates shall cooperate with all audits and investigations.
- C. Associates shall protect all Society resources and assets.
- D. Associates will perform their duties properly, diligently, and in appropriately courteous manner.
- E. Consistent with the provisions of any applicable document retention policy, no associate shall falsify, destroy, mutilate, conceal, or fail to make required entries on any record within the associate's control, including the destruction of documents that are the subject of an investigation or a civil or criminal action to which the Society is a party.
- F. Associates with reporting responsibilities shall provide full, fair, accurate, timely, and understandable disclosure in all reports.
- G. No associate shall discriminate on the basis of race, color, religious creed, gender, national origin, age, physical ability, sexual orientation, marital status, or veteran status in the conduct of services of the Society.
- H. Associates shall comply with all Society conduct and behavior policies, including those prohibiting sexual or other unlawful harassment.
- I. Associates who are lawyers, medical clinicians, chartered accountants, or members of other professional groups are bound by the appropriate professional duties and code of conduct of those roles.
- J. Associates shall comply with all Central, State and local laws statutes and ordinances.
- K. Associates shall comply with all Society policies on confidentiality and privacy of information including in the area of social media. Associates shall not access or use confidential or proprietary information for reasons unrelated to Society business.
- L. Associates and other volunteers engaged in the extramural research grant program peer review process, editorial review, or in the establishment of the Society's guidelines related

to health and nutrition shall abide by the Society's policies that govern ethical behavior and conflicts of interest in those areas.

- M. Associates shall seek assistance if they have questions about the code or face ethical dilemmas.
- N. Associates shall report violations or suspected violations of the Code.

#### **4. Duty of Loyalty to the Society**

The Society is a nonprofit, tax-exempt organization. Maintenance of its tax-exempt status is critical both for its continued financial stability and for public support. The Society is subject to scrutiny by, and is held accountable to, Government and regulatory authorities as well as the general public.

Consequently, there exists between the Society and its associates, a fiduciary duty which carries with it a duty of loyalty. Associates have the responsibility of administering the affairs of the Society honestly and prudently and of exercising their best care, skill, and judgment for the sole benefits of the Society. Moreover, because of the Society's status as a public charity, every Associate has an affirmative duty to act as a steward of the funds entrusted to the Society by its contributors.

Associates shall use the resources, property, and funds under the Associate's control judiciously and in the best interest of the Society. Associate shall exercise good faith in all transactions, and they shall not use Society assets or resources, their positions with the Society, and knowledge gain as a result of the position for their personal benefit or for the private pecuniary benefit of any other person or organization. The interest of the Society must be first priority in all decisions and actions they undertaken in connection with the Society.

No Associates shall accept, solicit, or agree to accept, without prior approval of his or her supervisor or Legal Department, any Gift from which it might be reasonably inferred that such Gift was given or offered for the purpose of influencing the Associates in the discharge of his or her duties. Vendor, grantee and partner selection must always be programmatic decisions based on merit by comparing and evaluating cost, quality, performance, and suitability. Decisions must not be influenced by any other factor, including Gifts, personal relationships or hospitality.

## **5. Anti – Bribery Policy**

- ICS is operating with integrity and in compliance with the laws of those jurisdictions in which it operates. ICS's reputation for acting fairly is built on its values as an organisation and the values of its employees. As part of the commitment to ethical practices, ICS does not tolerate acts of bribery or corruption.

## **6. Parties with Whom Conflicts May Arise** – A conflict of interests may arise in the relations of associates with any of the following third parties:

- Persons and firms supplying or potentially supplying goods and services to the Society (vendors and professionals), including, but not limited to :
  - Construction services.
  - Professional services, including accounting and legal services.
  - Contracts with individuals, including consultants and part time staff.
  - Contracts with Companies providing non-professional services such as marketing, research services, information technology, management consulting or other services etc.
  - Persons and firms from whom the Society purchases or leases property and equipment.
  - Persons and firms with whom the Society is dealing or planning to deal in connection with the purchase or sale of real estate, securities, or properties.
  - Persons or parties with a direct, material Financial Interest in the outcome of Society programs, policies or positions.
  - Purchasers of Society services.
  - Donors, volunteers, and other supporters of the Society.
  - Agencies, other non-profits, and associations that affect the operations of, or partner with, the Society.
  - Entities from whom the Society receives grants or to whom the Society provides grants.
  - Tobacco Companies and their related entities.

If there is a conflict of interest, it should be disclosed in advance and the person concerned should abstain from participating in decision making in that matter.

## **7. Reporting Violations – Duties, Protections and Corrective Actions**

- A. Each Associate shall immediately report to his or her supervisor or Indian Cancer Society HR/Legal department: violations of the Code, any Central, state or local law, or the attempt to induce a staff member or volunteer to violate the Code or any Central, State or local law. An associate who does not disclose a potential conflict in accordance with code is in violation of the Code. If anonymity is requested, the Society will not disclose the identity of the reporting individual except as needed to properly investigate the allegation, or unless legally required to do so.

The Indian Cancer Society will install a whistle blower Protection policy as per Annexure A and setup an independent hotline as a confidential resource dedicated for reporting any questionable activity related to any violation of the code.

## **B. Reporting details**

As already mentioned above, an ICS employee / associate is responsible for reporting actual or suspected violations of the Code of Conduct and for seeking clarification and guidance on ethics, compliance and legal issues. To report an actual or suspected ethical violation, or to seek guidance, you can contact Ethics line:

By calling (toll-free): **1800-102-6969** (between 9:00 am to 11:00 pm IST, Monday-Saturday)

Online at: <https://ics.integritymatters.in>

By Email: [ics@integritymatters.in](mailto:ics@integritymatters.in)

By mailing a letter to: Integrity Matters Unit 1211, CENTRUM, Plot No C-3, S.G. Barve Road, Wagle Estate, Thane West – 400604, Maharashtra, India

### **Important: “Please mention access code ICS in all your communication with Ethics line”**

Ethicsline is a dedicated service maintained by a third-party vendor and is available from 9:00 am to 11:00 pm IST, Monday-Saturday. Employees who contact Ethicsline will be assigned a unique report key that they may use to check on the status of reports and inquiries.

When using the Ethicsline you will have a choice to remain anonymous. It is vitally important for you to keep your report number in a safe place so you can follow up on your concern or question. Report number, if lost, cannot be retrieved. We may have follow-up questions about your concern, and you can assist with the investigation by calling or logging back in to the web reporting site to provide additional details. We request you to provide as much information as possible. Without all of the facts and complete information, it may be difficult for us to get to the bottom of your concern or question.

## 8. **Conclusion** -

If there is any slight doubt or question regarding the propriety of a proposed course of action, please discuss the matter with your superior or the legal/HR department of the Indian Cancer Society.

**(Issued by the Board of Trustees on behalf of the National Managing Committee of the Indian Cancer Society on 11<sup>th</sup> January, 2020)**

**Hari Mundra**  
Chairman

**Naveen Kshatriya**  
Hon. Secretary & Managing Trustee

**Uday Khanna**  
Hon. Treasurer & Jt. Managing Trustee

**INDIAN CANCER SOCIETY HOTLINE**

**Phone Number: 1800-102-6969**

**INDIAN CANCER SOCIETY (ICS)**

## **Annexure A**

### **Whistleblower Protection Policy : Reporting Suspected Violations of Law or Misconduct**

The Indian Cancer Society is committed to the highest standards of ethical, moral and legal business conduct where associates Associates (Associates means and include any person connected with the organization in any manner whatsoever) are free to raise good faith concerns regarding the Society's operating practices, specifically : (1) reporting suspected violations of National, State or local laws or regulations on the part of the Society : (2) providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body: and (3) identifying potential violations of the Society's Code of Conduct and Conflict of Interest Policy ("the Code").

Society's policy forbids any retaliatory action, including harassment, discrimination, intimidation, or in the case of employees, adverse employment consequences of any kind, to be taken against

any individual who, in good faith, reports any action or suspected action taken by or within the Society that is illegal, fraudulent or in violation of any adopted Society policy, including the Code, or who in good faith complains about, or raises a claim or concern about, any type of harassment, retaliation or discrimination prohibited by applicable Law or Society policy. Retaliation is also prohibited against individuals who are not themselves complainants, but who participate in good faith in an investigation. Any associate who engages in any form of retaliation will be subject to discipline, up to and including termination of employment or removal from a volunteer position. Associates who believe that they or someone they know are being, or have been, retaliated against should immediately report this to his or her supervisor, Society's Legal / HR department, or anonymously by calling the hotline at

(toll-free): 1800-102-6969 (between 9:00 am to 11:00 pm IST, Monday-Saturday)

Online at: <https://ics.integritymatters.in>

By Email: [ics@integritymatters.in](mailto:ics@integritymatters.in)

By mailing a letter to: Integrity Matters Unit 1211, CENTRUM, Plot No C-3, S.G. Barve Road, Wagle Estate, Thane West – 400604, Maharashtra, India

The Hotline is created for this purpose and is managed and staffed by an outside agency in order to maintain the anonymity of the source.

The protections of this policy extend to any employee who disclose information that the employee reasonably believes is evidence of gross mismanagement of a contract or grant, a gross waste of funds, an abuse of authority relating to a statutory contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to any contract (including the competition for or negotiation of a contract) or donation. An employee who believes they have been retaliated against for such a disclosure may report this to the chairman, to his or her supervisor or the HR/Legal department.

The Code may not address every situation that may occur. Employees should not misuse the mechanism to raise frivolous complaints.