
Anti-Corruption Policy

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PURPOSE & OBJECTIVE

Corporate Infotech Private Limited (“CIPL” or “Company”) is committed to create a workplace free from any kind of bribery and any other corrupt business practices. The Company follows absolute Zero Tolerance policy towards Corruption and Dishonest Business activities and methods. The purpose and objective of this Policy is to conduct and enforce a work culture wherein all the employees, whether permanent or on contractual basis, perform their business activities with utmost honesty, integrity and the highest ethical standards.

SCOPE

This Anti-Corruption Policy (“Policy”) is applicable to all Business Units of CIPL in Pan India and employees therein at all levels and grades, including Directors, Senior Officials, Field Engineers, Associates (whether permanent or temporary), Consultants, Business Partners, Vendors, Trainees, Pantry-Housekeeping Staffs or any other person associated with CIPL.

WHAT POLICY SAYS?

This Policy strongly reinforces the Company’s commitment towards creating a workplace free of any kind of corrupt business practices. It is illegal to directly or indirectly offer or accept Bribe (defined hereinbelow) or to indulge in any kind of Corrupt Business Practices (defined hereinbelow). In addition to this, bribing a government/ public official constitutes a separate offence under the law.

WHAT CONSTITUTES BRIBE?

A Bribe is an inducement, payment, reward or financial or other advantage offered/promised/provided/accepted to or from any person in order to gain any commercial, contractual, regulatory or personal advantage. To elaborate further, a Bribe may be anything of value (monetary or otherwise) or favours, gifts, inside information, corporate hospitality/entertainment, offering employment to a relative, payment or reimbursement of travel expenses, charitable donation or social contribution, abuse of position and can pass directly or through a third party.

WHAT CONSTITUTES CORRUPT BUSINESS PRACTICES?

An act or omission which is not ethical, or whose ulterior objective is personal gain or causing undue gain to someone else, an act in contradiction of CIPL’s policies, rules, code of conduct, assigned responsibilities etc.

DO'S & DON'TS

- Employees should not give or accept gifts, entertainment, or any other personal benefit or privilege that would in any way influence or appear to influence any business decision.
- Accepting money, gifts, entertainment, loans or any other benefit or preferential treatment from any existing or potential customer, supplier or business associate of the Company, is strictly prohibited, except occasional gifts of modest value and entertainment on a modest scale as part of customary business practice.
- As a General Principle, gifts of minor estimated value (e.g. pens, golf balls, desk diaries and the like) are acceptable. **Where the estimated value of the gift is or likely to be over INR 2,500 (Indian Rupees Two Thousand Five Hundred), such gift should be declined.**
- All other prospective offers of gifts or entertainment falling outside the purview of aforementioned, but which reflect customary and transparent business practice in the relevant market, may be accepted. However, in case of doubt, the Employee must refer the case to his/her reporting manager and/or the relevant business unit head who will decide upon the appropriate action to be taken.
- Any attempted act of Bribe or Corrupt Business Practice shall be immediately reported to the **Reporting Manager/ Business Unit Head or the HR Head**. The funds and resources of the Company shall not be used directly or indirectly for any such purpose.
- If any Employee is found to threaten or retaliate against another person who has refused to offer or accept a Bribe or indulge in Corrupt Business Practice or who has raised concerns about possible Bribery or corruption, then stringent action will be taken against such employee as per this Policy.

PREVENTIVE & CORRECTIVE ACTIONS

1. There is a clause of Anti-Corruption in the employment contract or appointment letter signed by everyone at the time of joining CIPL. Employees need to provide his/her agreement on that clause as well and company will have all the rights to take any disciplinary action if found guilty as per Anti-Corruption clause.
2. In Monthly Meeting Anti-Corruption Clause of CIPL is discussed as a mandatory Discussion point to recall the Do's & Don'ts
3. If any such scenarios of Bribery come into the attention of Management, a strict warning will be given and going forward the Employee will be terminated from employment in case he/she is found to repeating the same behaviour.
4. As a practice of following the Anti-Corruption Policy in day to day life, the same is checked during Internal Audits.

RECORD KEEPING

Employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memorandum and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness.

WHERE TO RAISE BRIBERY OR CORRUPTIVE CONCERN

Every person, to whom this policy applies too, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage. If he / she is unsure whether a particular act constitutes bribery or corruption or if he / she has any other queries, these should be raised with their respective **Reporting Manager, HR Team, Compliance Team** at compliance@cipl.org.in and/or to the Management directly via feedback@cipl.org.in

RESPONSIBILITY OF ANTI-CORRUPTION POLICY

The **Senior Management** has overall responsibility for ensuring that this Policy complies with the legal and ethical obligations and that all Employees comply with it.

Reporting Managers of all the Business Units are responsible for ensuring that their Reportees are aware of and understand this Policy, undertake training (for a new joiner / if needed) on how to implement and adhere to it and also monitor compliance of it.

The **Compliance (QA Team) / HR team** is responsible for monitoring this Policy, its use and effectiveness (and dealing with any queries on its interpretation). Monthly Internal Audits & Reviews are the ways to check the compliance of this policy on regular basis. Further, finding the gaps, providing improvement suggestions, taking management inputs, implementation and circulation of the updated Policy to all the employees come under the sole responsibility of PEG Team & Management.

WAIVER AND AMENDMENT IN THE POLICY

We are committed to continuously reviewing and updating our policies and procedures based on the learning. We will monitor the effectiveness and review the implementation of this Policy regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Therefore, this document is subject to modification. Any amendment or waiver of any provision of this Policy must be approved in writing by the Company's Board of Directors.