# Anti-Corruption and Anti-Bribery Policy

Entity Name: [Entity Name]

Effective Date: [Insert Date]

Approved By: Proprietor

## 1. Purpose

This policy sets out [Entity Name]’s commitment to conducting business honestly, transparently, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. It establishes the standards expected from all individuals associated with the entity.

## 2. Scope

This policy applies to:
- The Proprietor
- All employees, agents, contractors, consultants, interns, and representatives of the entity
- Third parties acting on behalf of [Entity Name] in any capacity.

## 3. Definitions

Bribery: Offering, giving, receiving, or soliciting anything of value to improperly influence a business decision.

Corruption: Abuse of entrusted power for private gain, including fraud, embezzlement, other unethical conduct, and facilitationpayment**:** A small payment made to secure or expedite routine government action — prohibited under this policy.

## 4. Policy Statement

### 4.1 Zero Tolerance

[Entity Name] has zero tolerance for bribery and corruption. All business activities must be conducted in compliance with applicable anti-corruption laws, including the Prevention of Corruption Act, 1988 (India), Indian Penal Code (IPC) concerning cheating, criminal breach of trust, and fraud, which can apply in private sector contexts. For international dealings, compliance with applicable foreign laws, such as the UK Bribery Act or the US Foreign Corrupt Practices Act (FCPA), and any other applicable jurisdictional laws.

### 4.2 Prohibited Conduct

* Offering, giving, or accepting bribes, kickbacks, or facilitation payments regardless of value, are strictly prohibited.”
* Using company funds for unlawful or unethical purposes
* Falsifying records to conceal corrupt activities
* Engaging in any form of influence-peddling

### 4.3 Gifts and Hospitality

Providing gifts or hospitality to government officials is strictly prohibited, unless explicitly allowed under applicable laws and authorised in writing by the Proprietor.

### 4.4 Third-Party Due Diligence

Third parties acting on behalf of the entity must be vetted to ensure they adhere to ethical business practices.
Third parties may be required to sign an annual compliance declaration.

## 5. Responsibilities

All employees and representatives must act with integrity and report suspected violations.
The Proprietor is responsible for investigating reported cases and taking appropriate corrective actions.

## 6. Reporting Violations

Any suspected act of bribery or corruption must be reported immediately to the Proprietor. Reports can also be made anonymously. All reports will be investigated promptly and impartially under the Whistleblowers Protection Act, 2014.

## 7. Disciplinary Action

Reports can also be made anonymously. All reports will be investigated promptly and impartially.

Violations of this policy may lead to disciplinary measures, including termination of employment, termination of contracts, and legal action.

## 8. Acknowledgement

This policy will be interpreted in accordance with applicable laws of India. Where any provision conflicts with a legal requirement, the higher standard will apply.

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name: [Proprietor’s Name]

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_