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INDUS NET TECHNOLOGIES PRIVATE LIMITED

ANTI-CORRUPTION POLICY

Version - 1



Document Release History

| Sl. No. | Version Number | Release Date | Prepared By | Reviewed & Approved By | Reasons for New Release |
|---------|----------------|--------------|---------------|------------------------|----------------------------------------|
| 1 | 1 | 30.03.2023 | Shikha Surana | Abhishek Rungta | Need of a model Anti-Corruption Policy |

Policy Statement:

INT. is committed to conducting its operations with the highest standards of integrity and ethical behavior. This Anti-Corruption Policy outlines the principles and guidelines that all employees, contractors, and stakeholders must adhere to in order to prevent corruption, bribery, and unethical practices in all aspects of INT.'s activities.

Prohibition of Corruption and Bribery:

- 1.1. INT strictly prohibits all forms of corruption, including bribery, extortion, facilitation payments, and any other unethical practices.
- 1.2. No employee, contractor, or stakeholder shall directly or indirectly offer, promise, or provide any form of bribe, kickback, or other illicit payment to any individual or organization, including government officials, suppliers, customers, or competitors, in order to obtain or retain business advantages.

Compliance with Laws and Regulations:

- 2.1. All employees, contractors, and stakeholders must comply with applicable anti-corruption laws and regulations in all jurisdictions where INT operates.
- 2.2. INT will provide regular training and resources to ensure all personnel are aware of their legal obligations and understand the consequences of non-compliance.

Conflicts of Interest:

- 3.1. All personnel must avoid situations that could create conflicts of interest between their personal interests and their responsibilities to INT.
- 3.2. Any actual or potential conflicts of interest must be promptly disclosed to the appropriate authorities within INT.

Gifts, Entertainment, and Hospitality:

- 4.1. INT acknowledges that the exchange of reasonable and customary business gifts, entertainment, and hospitality is a common business practice.
- 4.2. All gifts, entertainment, or hospitality must be given or received in accordance with applicable laws, policies, and industry standards, and should not create the appearance of impropriety or influence decision-making.

Reporting Suspected Corruption:

- 5.1. INT encourages all employees, contractors, and stakeholders to promptly report any suspected corrupt activities, bribery attempts, or unethical behavior.
- 5.2. Whistleblower protection mechanisms will be implemented to ensure that individuals who report in good faith are protected from retaliation.



Due Diligence:

6.1. INT will conduct thorough due diligence on all potential business partners, suppliers, and contractors to assess their integrity and commitment to anti-corruption practices.

6.2. INT will avoid engaging in business relationships with individuals or organizations known to be involved in corrupt activities.

Monitoring and Enforcement:

7.1. INT will establish appropriate monitoring mechanisms to detect and prevent corrupt practices within its operations.

7.2. Non-compliance with this policy may result in disciplinary action, including termination of employment or contractual relationship, and potential legal consequences.

Training and Awareness:

8.1. INT will provide regular training and awareness programs to ensure all employees, contractors, and stakeholders understand the requirements of this policy and their role in preventing corruption.

8.2. Training programs will cover topics such as anti-corruption laws, reporting procedures, and best practices for ethical conduct.

Policy Review:

9.1. This policy will be reviewed periodically to ensure its effectiveness and relevance to INT's operations.

9.2. Updates or amendments to the policy will be communicated to all relevant parties, and appropriate training will be provided as necessary.

Adherence to this Anti-Corruption Policy is essential for the success and reputation of INT. All employees, contractors, and stakeholders are expected to fully comply with the principles outlined herein.