

# **INDUS TREE CRAFTS FOUNDATION**

## **ANTI-CORRUPTION & BRIBERY POLICY**



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## 1. Introduction:

- This policy has been formulated by the Indus Tree Crafts Foundation to conduct all of our activities in an honest, ethical, and loyal manner. We have established a zero-tolerance approach towards the corruption and bribery acts by any participant from the bottom of the organizational chart to top management. We are committed to acting in the most professional manner possible with complete integrity in all our operations, activities, and relationships, regardless of the location.
- We are also committed to implementing and enforcing the internal systems to tackle bribery. All our employees and collaborators are prohibited from engaging in bribery and such activities. If any employee staff or collaborators of Indus Tree Crafts Foundation become aware of the potential bribery within or external to the Indus Tree Craft Foundation, It is their responsibility to report the suspicion or awareness to the Indus Tree Craft Foundation legal representative.

## 2. Scope:

- This policy applies to all individuals working for all the individual working for Indus Tree Crafts Foundation it includes senior managers, officers, directors, employees (regular, fixed-term, or temporary), consultants, trainees, agency staff, volunteers, interns, agents, sponsors, or any other person associated, joint ventures or their employees, wherever located.

## 3. Definition:

### I. Bribery:

- A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or business or personal advantage OR
- Act of offering money or something valuable to someone in the organization in order to persuade them to do a favor in return.

### II. Kickbacks:

- Kickbacks are payment of any portion of a contract made to employees of another contracting party or the utilization of other techniques, such as subcontracts, purchase orders or consulting agreements, to channel payment to public officials, political parties, party officials or political candidates, to employees of another contracting party, or their relatives or business associates.

## 4. Prohibited Activities:

- The following activities are prohibited under the anti-corruption policy of the Indus Tree Craft Foundation:

- a) give, promise to give, or offer, a payment, gift or hospitality to a third party or otherwise engage in or permit a bribery offence to occur, with the expectation or hope that an advantage in business will be received, or to reward a business advantage already given.
  - b) give, promise to give, or offer, a payment, gift or hospitality to a third party to "facilitate" or expedite a routine procedure.
  - c) accept a payment, gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the Indus Tree Craft Foundation in return.
  - d) engage in any activity that might lead to a breach of this Policy.
- Non-compliance with the Policy may result criminal or civil penalties which will vary according to the offence. An employee acting in contravention of the Policy will also face disciplinary action up to and including summary dismissal.

## **5. Gifts and Hospitality:**

- This Policy does not prohibit normal and appropriate hospitality given or received with Indus Tree Crafts Foundation's gifts & hospitality to or from third parties.
- Normal business hospitality must always be approved at the appropriate level of Indus Tree Craft Foundation management.
- Employees should always assess the purpose behind any hospitality or gifts. Hospitality or gifts with the intention of improperly influencing anyone's decision-making or objectivity or making the recipient feel unduly obligated in any way, should never be offered or received.
- It is acceptable to offer modest promotional materials to contacts e.g., branded pens. Use of one's position with the Indus Tree Craft Foundation to solicit a gift of any kind is not acceptable.
- Employees may never pay on their personal account for gifts or hospitality in order to avoid this policy.
- In some cultures/countries, it may be seen as an insult to reject a gift, and refusals may adversely affect business relationships. In these circumstances, and if the gift is anything other than moderate, the gift should be reported to the reporting manager who will decide whether such gift will be retained or returned.

## **6. Facilitation Payments and Kickbacks:**

- The Indus Tree Craft Foundation prohibits making or accepting facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite

a routine action by an official. Kickbacks are typically payments made in return for a business favor or advantage. All associates must avoid any activity that might lead to a facilitation payment or kickback being made or accepted.

#### **7. Donations:**

- The Indus Tree Craft Foundation may make donations, but only if they are ethical and in compliance with this policy, local applicable laws, and International Applicable laws. No donation should be made which may, or may be perceived to breach applicable law, or any other section of this policy. All donations must be approved by the Indus Tree Craft Foundation Corporate Ombudsman and the Indus Tree Craft Foundation shall keep accurate records of all donations made by the Indus Tree Craft Foundation.

#### **8. Record Keeping:**

- Indus Tree Crafts Foundation will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to, and receiving payments from, third parties.
- Employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review and/or a review from the appropriate member of the Indus Tree Craft Foundation's Human Resource (HR) team.
- All accounts, invoices, memoranda 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.
- No records shall ever be kept "off-book" to facilitate or conceal improper payments

#### **9. Raising A Concern or Complaint:**

- Associates are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, you should raise the matter with your reporting manager or consult an appropriate member of the Human Resource (HR) team.

#### **10. Protection:**

- Associates who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions.
- Indus Tree Crafts Foundation encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

- Indus Tree Crafts Foundation is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in corruption, or because of reporting concerns under this policy in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

### **11. Training And Communication:**

- Dissemination of this policy for new joiners shall be carried out at the time of induction. This policy will also be shared with all existing associates. If you have any query about this policy, you should contact your reporting manager.
- Indus Tree Crafts Foundation's zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Indus Tree Crafts Foundation's business relationship with them and as appropriate thereafter. Wherever possible, all third parties should be sent a copy of this policy at the outset of the business relationship.

### **12. Responsibility:**

- The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- The head of the Human Resources Department of the region has primary day-to-day responsibility for implementing this policy. Management at all levels is responsible for ensuring that those reporting to them are made aware of and understand this policy and, if necessary and appropriate, are given adequate and regular training on it.

### **13. Monitoring And Review:**

- The head of the Human Resources Department of the region will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.
- All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Head of HR Operations. This policy does not form part of the employee's contract of employment, and it may be amended at any time by the Indus Tree Crafts Foundation.

#### 14. Examples:

- This section contains a list of examples of prohibited bribery. It is not intended to be exhaustive and is for illustrative purposes only.
  - **Offering a bribe:**
- You offer a potential customer ticket to a major sporting event, but only if they agree to do business with Indus Tree Crafts Foundation.
- This would be an offence (by you) as you are making the offer to gain an improper commercial and contractual advantage. Indus Tree Crafts Foundation may also be found to have committed an offence because the offer has been made improperly to obtain business for us. It may also be an offence for the potential customer to accept your offer.
  - **Receiving a bribe:**
- A supplier gives your nephew a job, but makes it clear that in return, they expect you to use your influence in our organization to ensure we continue to do business with them.
- It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain an improper personal advantage.
  - **Bribing a foreign official:**
- You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as clearing computer hardware through customs.
- The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. Indus Tree Crafts Foundation may also be found to have committed an offence.

#### 15. Authorized Signatory:

*Name: Ms. Remya Devan  
Designation: Project Manager  
Indus Tree Crafts Foundation*