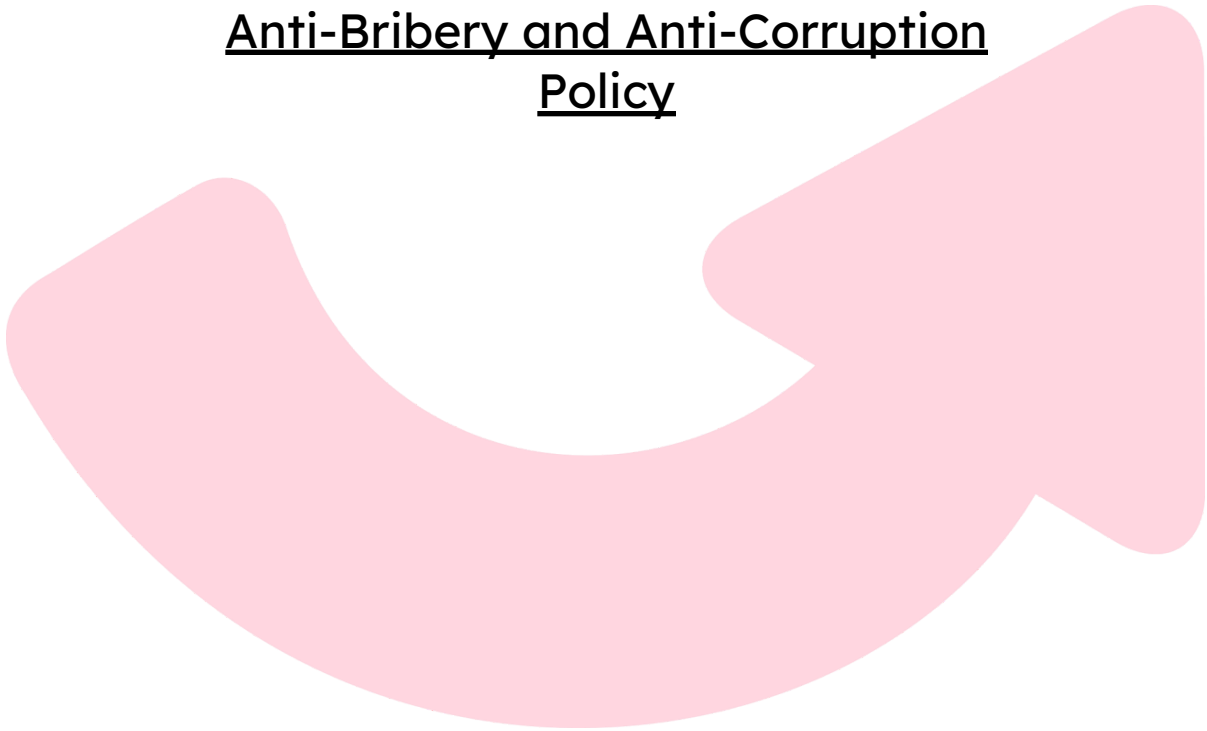




Anti-Bribery and Anti-Corruption  
Policy



## 1. Introduction

InfoBeans is committed to conducting its business activities in an ethical and transparent manner. We adhere to the highest standards of integrity and are determined to prevent bribery and corruption in all its forms. This policy outlines our zero-tolerance approach towards bribery and corruption and provides guidelines to ensure compliance with applicable laws and regulations.

## 2. Purpose

The purpose of this policy is to set out the responsibilities of InfoBeans and those individuals acting on its behalf in observing and upholding InfoBeans's position on bribery and corruption. Every individual or group of individuals, associated to InfoBeans in any form, whether the staff members, the ad-hoc staff engaged in the program activities of the organization, the consultants, the contractors, the interns, the partner organizations and any other party with a financial or trustee-beneficiary relationship with InfoBeans are expected to share this commitment. The basic objective of this statement is setting out the policy of InfoBeans towards the prevention and identification of bribery and corruption and the certain procedures to be followed, if at all, any fraud is found or having an idea / impression of its existence.

## 3. Scope

This policy applies to the Staffs, ad-hoc staffs, Advisers, Consultants, Suppliers, Partners and Individuals acting on behalf of the Society, irrespective of their location.

## 4. Statement

InfoBeans will not engage in bribery or any form of unethical inducement or payment including facilitation payments and "kickbacks." All the Staff, Ad-hoc staff, Advisers, Consultants, Suppliers, Partners and Individuals acting on behalf of InfoBeans are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activities of InfoBeans. InfoBeans expects its suppliers and partners to act with integrity and without thought or actions involving bribery and/or corruption and will, where appropriate, include clauses to this effect in relevant contracts.

## 5. Prohibited Activities:

- I. It is prohibited, directly or indirectly, for any staff or individual acting on behalf of InfoBeans to offer, give, request or accept any bribe (i.e. gifts with mala-fide intentions, loan, payment, reward or advantage, either in cash or any other form of inducement), to or from any person or company in order to gain commercial, contractual or regulatory advantage for InfoBeans, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

**II. This policy requires employees and individuals acting on behalf of InfoBeans:**

- Not to offer, promise or make any bribe or unauthorized payment or inducement of any kind to anyone.
- Not to solicit business by offering, promising or making any bribe or unofficial payment to suppliers.
- Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorized by InfoBeans in the ordinary course of business.
- To refuse any bribe or unusual payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers.
- Not to make facilitation payments. These are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement. InfoBeans will not tolerate or condone such payments being made.
- To report any breaches of this policy's principles or standards or of any associated.

**6. Criminal Offense (as defined in IPC)**

It is a criminal offense to:

- Offer a bribe.
- Accept a bribe.
- Fail to prevent a bribe (only applies to commercial organizations)

Staffs, ad-hoc staff, advisers, consultants, suppliers, partners and any individuals acting on behalf of InfoBeans should be made aware that if they are found guilty by a court of committing bribery, embezzlement or fraudulence an individual could face prosecution as per the norms of IPC (Indian Penal Code).

**7. Gifts and Hospitality**

InfoBeans realizes that giving and receiving of gifts and hospitality without any mala-fide intentions, or in other words, where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

**8. Management Commitment**

The management of InfoBeans is responsible for setting the tone from the top and ensuring compliance with this policy. They are required to demonstrate leadership, provide guidance, and allocate appropriate resources to prevent bribery and corruption.

## **9. Employee Responsibilities**

All employees must:

- a) Familiarize themselves with this policy and comply with its provisions.
- b) Refrain from engaging in any form of bribery or corrupt practices.
- c) Report any suspected or actual instances of bribery or corruption promptly through the designated reporting channels.
- d) Cooperate fully with any investigations into alleged violations of this policy.

## **10. Due Diligence and Risk Assessment**

InfoBeans is committed to conducting thorough due diligence on business partners, agents, suppliers, and any other third parties with whom we engage. Risk assessments will be conducted to identify and mitigate bribery and corruption risks associated with our business activities.

## **11. Training and Communication**

InfoBeans will provide regular anti-bribery and corruption training to all employees to enhance their understanding of the risks, legal obligations, and preventive measures. Communication channels will be established to promote awareness and facilitate the reporting of concerns or potential violations.

## **12. Compliance Monitoring and Reporting**

Regular monitoring and auditing activities will be conducted to ensure compliance with this policy. Any suspected or actual breaches of this policy must be reported immediately through the designated reporting channels. InfoBeans will investigate all reported concerns or allegations promptly and take appropriate disciplinary or corrective action, which may include termination of employment and referral to law enforcement authorities if necessary.

## **13. Protection and Non-Retaliation**

InfoBeans prohibits retaliation against individuals who report concerns or participate in good faith in investigations related to bribery and corruption. Confidentiality will be maintained to the fullest extent possible, and all reports will be handled in a discreet and sensitive manner.

#### **14. Continuous Improvement**

InfoBeans is committed to continually reviewing and improving its anti-bribery and corruption measures. This policy will be regularly reviewed to ensure its effectiveness, and any necessary updates will be made in accordance with changes in laws, regulations, or business practices.

#### **15. Compliance and Consequences**

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contractual relationships. Non-compliance with anti-bribery and anti-corruption policy will result in reporting to appropriate authorities regarding the non-compliance and strict action will be taken.



**Declaration of understanding of the anti-bribery & corruption and bribery act code of conduct and policy**

I ..... confirm that I have read the InfoBeans's Anti-Bribery & Corruption and Bribery Act Code of Conduct and Policy. I also confirm that I have understood the requirements of the Code of Conduct and Policy and my responsibilities in relation to this document. I understand that if I am party to any breach of the Code of Conduct and Policy then it could be regarded as Gross Misconduct and that this may result in disciplinary action, up to and including dismissal, in accordance with the InfoBeans's disciplinary procedures.

Signed: .....

Name: .....

Designation: .....

Date: .....