



ANTI-CORRUPTION & ANTI-BRIBERY POLICY

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Reviewed By:	Ms. Supreet Sarosh
Approved By:	Mr. Madhu Shivangi

1. Policy Statement

Uni-Tritech Pvt Ltd is committed to conducting all its business activities with integrity, transparency, and the highest ethical standards. The Company adopts a zero-tolerance approach towards bribery, corruption, facilitation payments, and any form of unethical or improper business conduct.

No employee, director, or representative of the Company shall offer, give, request, accept, or authorize any bribe or improper advantage, whether directly or indirectly, to influence a decision, secure an improper benefit, or gain an unfair business advantage in dealings with public officials or private parties.

2. Purpose

The purpose of this policy is to establish a clear framework to prevent, detect, and address bribery and corruption risks across the Company's operations and value chain. This policy defines prohibited conduct, governance expectations, responsibilities, and reporting mechanisms to ensure ethical business practices.

3. Scope

This policy applies to:

- All employees (permanent, temporary, contractual, apprentices, trainees)
- Members of the Board and senior management
- Agents, consultants, intermediaries, contractors, suppliers, distributors, and other third parties acting on behalf of the Company
- All business operations, transactions, and interactions with public officials, customers, suppliers, and other stakeholders

4. Definitions

- **Bribery:** Offering, giving, requesting, or receiving anything of value to influence a decision or obtain an improper advantage.
- **Corruption:** Abuse of entrusted power for private gain.
- **Facilitation Payments:** Small unofficial payments made to expedite routine actions; strictly prohibited.
- **Third Parties:** Any individual or entity acting on behalf of or providing services to the Company.

5. Applicable Laws, Regulations & Guiding Frameworks

5.1 National Laws & Regulations

The Company complies with all applicable anti-corruption and corporate governance laws, including:

- Prevention of Corruption Act
- Companies Act (including provisions on corporate governance and whistleblowing)
- Indian Penal Code provisions related to bribery and fraud

5.2 International Standards & Principles

- UN Global Compact – Principle 10 (Anti-Corruption)
- OECD Anti-Bribery Convention
- UK Bribery Act (as good practice reference)

5.3 Voluntary & Industry Standards

- ISO 37001 – Anti-Bribery Management Systems
- ISO 26000 – Social Responsibility
- Relevant industry codes of conduct

6. Objectives and Targets

6.1 Qualitative Objectives

The Company aims to:

- Prevent bribery and corruption across all business activities.
- Promote ethical conduct and a strong culture of integrity.
- Ensure transparency and accountability in financial and commercial transactions.
- Strengthen awareness of anti-corruption expectations among employees and third parties.
- Provide effective reporting and protection mechanisms.

6.2 Quantitative Targets

The Company will work towards:

- Zero tolerance for bribery and corruption.
- 100% compliance with applicable anti-corruption laws.
- 100% coverage of employees under ethics and anti-corruption training.
- 100% inclusion of anti-corruption clauses in relevant third-party contracts.
- Zero confirmed incidents of bribery or corruption.

7. Prohibited Practices (No-Gift & Zero-Tolerance Approach)

The Company strictly prohibits:

- Direct or indirect bribery in any form
- Offering or accepting gifts, hospitality, or benefits intended to influence decisions
- Facilitation payments or “speed money”
- Use of third parties to channel improper payments
- Political or charitable contributions used as a means of bribery

Any exception to business courtesies, if permitted by law, must be transparent, documented, and approved in accordance with internal governance requirements.

8. Third-Party Due Diligence & Internal Controls

The Company adopts a risk-based approach to third-party due diligence to identify and mitigate corruption risks associated with agents, consultants, suppliers, and intermediaries. Anti-corruption expectations are communicated through contracts, codes of conduct, and engagement processes.

Appropriate financial and operational controls are maintained to ensure transparency, segregation of duties, and proper authorization of payments and transactions.

Employees shall disclose any actual or potential conflicts of interest that could influence business decisions.

9. Reporting, Whistleblowing & Protection

The Company provides accessible channels for employees and external stakeholders to report concerns or suspicions related to bribery or corruption. Reports may be made confidentially and, where permitted, anonymously.

All reports are taken seriously and handled impartially. Retaliation against any individual who raises a concern or participates in an investigation in good faith is strictly prohibited and constitutes a disciplinary offence.

10. Investigations & Disciplinary Action

Reported concerns are reviewed and investigated by designated functions in a fair and confidential manner. Where violations are confirmed, appropriate disciplinary actions are taken, which may include termination of employment or contracts and reporting to competent authorities where required.

Failure to report known or suspected violations or attempts to interfere with investigations may also result in disciplinary action.

11. Training & Communication

The Company communicates this policy to all employees and provides periodic training to reinforce ethical conduct and awareness of anti-corruption risks. Employees in higher-risk roles, such as procurement, sales, finance, and logistics, may receive additional focused training.

Key third parties are also informed of the Company's zero-tolerance stance on bribery and corruption.

Anti-corruption awareness shall be included during employee induction and periodically thereafter.

12. Governance, Monitoring & Review

Implementation of this policy is overseen by management through monitoring of training coverage, reported incidents, investigations, and corrective actions. The effectiveness of the policy is reviewed periodically and updated as required to reflect changes in laws, risks, or stakeholder expectations.

Anti-corruption performance and reported concerns may be reviewed at management level to ensure oversight and continuous improvement.

Relevant records related to due diligence, approvals, and investigations shall be maintained as per document retention requirements.

13. Roles and Responsibilities

Role	Responsibilities
Top Management	Approve the policy, provide oversight, and promote ethical culture.
Human Resources	Implement training, manage reporting and investigations, and enforce disciplinary action. Support monitoring, assessments, and reporting.
Procurement & Commercial Teams	Conduct third-party due diligence and embed anti-corruption clauses in contracts.
All Employees & Representatives	Comply with the policy and report concerns in good faith.
Suppliers & Business Partners	Adhere to anti-corruption expectations and applicable laws.

14. Document Control & Approval

This document is controlled and becomes effective only after formal preparation, review, and approval. Any revisions must follow the established document control process. Only the latest approved version shall be used.

 <p>Approved By: Mr. Madhu Shivangi Chief Operating Officer 25th March 2024</p>	 <p>Reviewed By: Ms. Supreet Sarosh Vice President – Human Resources 22nd March 2024</p>	 <p>Prepared By: Ms. Prabhleen Khotra Assistant Manager – Human Resources 20th March 2024</p>
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