



## **Anti -Bribery and Anti-Corruption Policy\***

1. **Introduction:** Aarvi Encon is committed to the setting up, utmost standards for transparency and accountability in all its affairs. Aarvi Encon strives in attaining it's mission through compliance of high legal and ethical standards. Aarvi Encon does not tolerate any form of bribery, embezzlements or corruption, and will uphold all laws countering bribery, fraud and corruption in all forms.
2. **Purpose:** The purpose of this policy is to set out the responsibilities of Aarvi Encon and those individuals acting on its behalf in observing and upholding Aarvi Encon's position on bribery and corruption. Every individual or group of individuals, associated to Aarvi Encon 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 organisations and any other party with a financial or trustee-beneficiary relationship with Aarvi Encon are expected to share this commitment. The basic objective of this statement is setting out the policy of Aarvi Encon 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 it's 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. Governing Body (GB) has been excluded from the scope, considering the fact that GB is not directly involved in any of Aarvi Encon's day-to-day business and/or routine functions. The Governing Body has vested powers and responsibilities to various functionaries and constituted committees to execute routine functions of the organization.
4. **Statement:**

- i. Aarvi Encon 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 the Aarvi Encon are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activities of Aarvi Encon.
- ii. Aarvi Encon 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 Aarvi Encon 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 Aarvi Encon, 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 Aarvi Encon:
  - a. Not to offer, promise or make any bribe or unauthorised payment or inducement of any kind to anyone;
  - b. Not to solicit business by offering, promising or making any bribe or unofficial payment to suppliers;
  - c. Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorised by Aarvi Encon in the ordinary course of business;
  - d. 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;
  - e. 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. Aarvi Encon will not tolerate or condone such payments being made;

- f. To report any breaches of this policy's principles or standards or of any associated

## **6. Criminal Offence (as defined in IPC)**

- i. It is a criminal offence to:
  - a. Offer a bribe;
  - b. Accept a bribe;
  - c. Fail to prevent a bribe (only applies to commercial organizations)
- ii. Staffs, ad-hoc staff, advisers, consultants, suppliers, partners and any individuals acting on behalf of Aarvi Encon 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:**

Aarvi Encon realises 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. Raising a Concern**

- i. If an employee or an individual acting on behalf of Aarvi Encon is offered a bribe, or a bribe is solicited from them, they should not agree to it unless their immediate safety is in jeopardy. Should this be the case, the employee or individual should at first instance contact the Unit/Site/Centre In-Charge as soon as they are able to do so. The employee or individual may be required to give a written account of the events to assist with any investigation. If any

Unit/Site/Centre In-Charge is involved in such an act, the individual may contact Executive Officer for reporting the case and likewise if the concerned Executive Officer is involved in such an act, the individual may directly contact the Director of Aarvi Encon for reporting such case.

- ii. Employees or individuals acting on behalf of Aarvi Encon are encouraged to raise concerns about any instance of bribery or corruption at the earliest possible stage. The employee or individual raising a concern can do so in confidence and without fear of reprisals. All reports raised are taken seriously and, where appropriate, investigated. No employee or individual will be discriminated against in any way as a result of reporting a concern in good faith.
  - iii. If any instance of bribery or corruption is identified; Aarvi Encon management will take the remedial steps immediately. Aarvi Encon has its own system of investigating its staff member for violation of service conduct including financial irregularities, corruption, fraud or embezzlement. If the charges are proved the delinquent may be awarded penalties depending on the gravity of misconduct.
  - iv. These rules are based on the following principles:-
    - a. The right of Aarvi Encon to take appropriate disciplinary steps against any delinquent staff member, who acts in a manner conflicting with the code of conduct and prescribed rules / regulations.
    - b. At the same time the rules also recognize the right of delinquent staff member to a fair hearing and applicable and just disciplinary action.
    - c. The emphasis of disciplinary action is on prevention, justice and rehabilitation.
9. **Review of this Policy:** In the interests of maintaining best practice, the contents of this Anti-Fraud Policy will be reviewed by the Board and the Audit Committee of the Company every year.
10. **Reporting and Investigation:**
- i. An individual can report at three levels, as indicated below:
    - o Centre or Site in-charge (CiC) or / Executive Officer (EO) at primary level.

- Director at secondary level, in case if the concerned Executive Officer (EO) and/or Centre in-charge is/are involved in such an act.

Investigation:

- The Board will form a committee to investigate.
- Governing Body will have the discretion to form a committee to investigate, in such a case where any member(s) of the Board is involved in the act.
- In case of involvement in Bribery/Corruption activities by any of our member, an Individual can make a complaint in writing on the [ethics@aarviencon.com](mailto:ethics@aarviencon.com). The Concerned Person will take the action as soon as possible.

\*Note: Last amended on 12.11.2019.