Introduction:
MUKTI is committed to conducting its business with integrity and in compliance with all applicable laws and regulations. This Corruption and Anti-Bribery Policy outlines the principles and guidelines to be followed by all employees, contractors, and representatives of MUKTI to prevent corruption and bribery in any form. Either a violation of this Policy or the organization’s Code of Business Conduct could result in disciplinary actions including, but not limited to, termination of employment. It is therefore vital that you not only understand and appreciate the importance of this Policy, but also comply with it in your daily work.

DEFINITIONS

(a) Bribery: Bribery includes the offer, promise, giving, demand or acceptance of an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust. Bribes often involve payments (or promises of payments) but may also include anything of value - providing inappropriate gifts, hospitality and entertainment, inside information, or sexual or other favours; offering employment to a relative; underwriting travel expenses; abuse of function; or other significant favors. Bribery includes advantages provided directly, as well as indirectly through an intermediary. Bribery also includes any attempt to do any of the foregoing.

(b) Corruption: Corruption includes wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral, or incompatible with ethical standards. It is usually designed to obtain financial benefits or other personal gain. For example, bribes offered or promised in the form of money, a privilege, an object of value,

Purpose and Goals of policy:

The purpose of this Anti-Bribery and Anti-Corruption Policy (“ABAC Policy”) is to outline guiding principles and adequate procedures to prevent any activity or conduct relating to bribery, facilitation payments, or corruption. This Policy is intended to outline the organization’s risks related to bribery and corruption, to highlight our responsibilities under both the relevant anti-corruption laws and Company policies, and to provide you with the tools and support necessary to identify and combat those anti-corruption risks.

The aims and objectives of the Policy are:
a) To initiate the steps to reduce the bribery and corruption risks to the business of the Organization by setting out clear guidelines.
b) To encourage all employees to be vigilant and to act diligently in good faith.
c) To monitor and investigate instances of alleged corruption.
d) To take firm and vigorous action against any individual(s) involved in corruption.
e) To minimize the risk of involvement of all employees and Directors in corruption related activities;
f) To form a common understanding for all stakeholders that MUKTI prevents the corruption in any form;
g) To set responsibility for the employees of MUKTI to know and comply with the principles and requirements of the Policy, the key rules of the applicable anticorruption laws, as well as adequate procedures to prevent corruption.

**Scope and Range of application:**

MUKTI expects all associates, officers, directors, and third parties working on its behalf to refrain from engaging in any form of bribery or corruption, irrespective of citizenship, domicile, or location. In addition to this general prohibition on bribery and corruption, this Policy and the AB Process Documents set forth several policy and procedural requirements that apply to all associates of MUKTI and its controlled subsidiaries.

**POLICY STATEMENT**

(a) We do not tolerate bribery or corruption in any form or manner. Our organization is committed to implementing and enforcing adequate procedures to prevent, deter, detect, and counter bribery and corruption in any form or manner.

(b) As a part of this commitment, offering, promising to offer, or accepting bribes, directly or indirectly, and being involved in corruption is prohibited. This commitment shall reflect in every aspect of our activities.

(c) Our organization is committed to maintaining detailed and accurate books of account of all transactions, which will aid in detection of bribery or corruption.

(d) Any violation of this ABAC Policy by MUKTI Personnel will be regarded as a serious matter and shall result in disciplinary action. In addition, most countries’ legislations impose a strict liability and, in some cases, even criminal liability on MUKTI Personnel and its directors, that fail to prevent bribery within their activities.

(e) The guidelines in this ABAC Policy should be read in conjunction with:

   i. Tata Code of Conduct;
   ii. The Whistle-blower Policy;
   iii. Gifts and Hospitality Policy;
   iv. Any guidance published pursuant to this ABAC Policy;
   v. Any other relevant policies as may be implemented from time to time.

**Prohibited Conduct:**

a. Bribery: MUKTI strictly prohibits the offering, giving, receiving, or soliciting of any bribe, whether in cash or any other form, to gain an undue advantage or influence a decision.

b. Corruption: Any form of corruption, including but not limited to extortion, embezzlement, fraud, money laundering, and abuse of power, is strictly prohibited.

**Gifts and Hospitality:**

a. Employees must not offer or accept gifts, hospitality, or any other benefits that could compromise their, or MUKTI's, integrity.

b. Modest and appropriate gifts or hospitality may be accepted or offered in the normal course of business, provided they do not create an obligation or compromise ethical standards.
Reporting & Redressal:
a. All employees are encouraged to report any suspected or observed acts of corruption or bribery promptly to their supervisor, manager, or through the designated reporting channels.
b. MUKTI ensures protection against any form of retaliation for employees who report suspected violations in good faith.

Investigation:
- Once a complaint has been filed an investigation will be undertaken immediately. In instances where there is an alleged respondent, the respondent will be notified immediately. The complainant and the respondent will both be interviewed along with any individuals who may be able to provide relevant information.

Timelines:
MUKTI will investigate all complaints immediately and will work towards the prompt resolution and such a dispute. The first round of investigation and conclusion shall be arrived at within 10 working days from the date of filing of the complaint.

Fairness:
All complaints will be investigated in the same manner with the aim of promoting, fairness and equality.

Confidentiality and the Right to Privacy
MUKTI will preserve the confidentiality of all individuals involved in such complaint. The preservation of confidentiality may be affected by the employer's duty to prevent such activities in/at MUKTI and by the alleged respondent's right to know the nature of the complaint being made against them and who has made it so that they can respond. If the investigation fails to find evidence to support the complaint, no documentation concerning the complaint will be placed on the file of the respondent. MUKTI will retain all documentation for 12 months for informational purposes in the event that there is an internal appeal or a complaint filed with an outside agency.

Outcomes and Remedies:
MUKTI will act swiftly to ensure that such practices are stopped as soon as possible and may remedy the situation in a number of ways. The main concerns of the employer will be to ensure that no such incident is repeated in future.

Appeal Process:
Within 10 days from the result of first round of investigation, either the complainant or the respondent may make a written request that an investigation be reviewed stating which aspect of the investigation is inadequate. The request must be submitted to HR, who will determine if the investigation is to be re opened in order to address the concerns raised. In case the appeal is taken up, then the investigation shall be completed within 15 working days by the same committee with the inclusion of an independent member. The result of the appeal shall be binding on the complainant for all purposes.

Due Diligence:
a. MUKTI will conduct due diligence on third parties, such as suppliers, contractors, and partners, to ensure they adhere to similar ethical standards.
b. Engaging with third parties who have a history of corruption or bribery will be avoided.

**Disciplinary Action:**
Violations of this policy will result in disciplinary action, which may include termination of employment, legal action, or termination of business relationships.

**Continuous Improvement:**
MUKTI is committed to regularly reviewing and updating this policy to ensure its effectiveness in preventing corruption and bribery.

**Compliance with Laws:**
MUKTI and its employees shall comply with all applicable anti-bribery and corruption laws in the jurisdictions in which they operate.

**Approval and Adoption:**
This policy has been approved by the MUKTI Board of Directors and is effective from the date of adoption.

This policy serves as a guideline to ensure that MUKTI's operations are conducted with the highest standards of integrity and ethics. It is the responsibility of every individual associated with MUKTI to uphold these principles and report any suspected violations promptly.