

Consumer Unity & Trust Society (CUTS)
Anti-Corruption Policy

I. PURPOSE

The anti-corruption laws in India, including The Prevention of Corruption Act, 1988, make the payment or offer of payment or even receipt of a bribe, kickback or other corrupt payment a crime. It subjects all concerned to fines and/or imprisonment.

The purpose of this Policy is to ensure compliance by all employees, officers and office bearers of CUTS, and its authorised representatives, with the related anti-corruption laws in India and elsewhere with which the organisation associates.

II. SCOPE

This Policy applies to all employees, officers and office bearers of CUTS in India and elsewhere or any other person so authorised by CUTS. This policy should be read in conjunction with CUTS Service Rules; CUTS Code of Conduct and all other relevant policies in force.

III. POLICY

1. Bribes, Kickbacks or Other Corrupt Payments

1.1 It is the policy of CUTS that, in working anywhere, all employees, officers and office bearers of CUTS or any of its affiliates, must comply fully with applicable anti-corruption laws, especially The Prevention of Corruption Act, 1988.

1.2 CUTS employees are prohibited from directly or indirectly offering, giving, soliciting or receiving any form of bribe, kickback or other corrupt payment, or anything of value, to or from any person or organisation, including government agencies, individual government officials, private companies and employees of those private companies.

1.3 No employee will be penalised on his or her refusal to pay a bribe.

2. Gifts and hospitality

2.1 This policy does not prohibit gifts, entertainment, hospitality or other promotional expenditures (given and received) to or from third parties which are proportionate, transparent, reasonable and for bona fide purposes related to the aims and objectives of the CUTS provided:

- (a) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (b) it is appropriate in the circumstances. For example, it is given as a ceremonial gift on a festival or at another special time (e.g. Deepawali or New Year);
- (c) taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- (d) it is given openly, not secretly.

2.2 CUTS appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

2.3 Gifts of a value of more than Rs.1,999 per event, per person (or of comparable value in a different country) should not be given or offered (to or from

a single source on a single occasion) unless they have the written approval of the Core Management Committee.

2.4 It is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope or that this will influence the decision-making of the CUTS or that a business advantage will be received, or to reward a business advantage already given.

3. Responsibilities

3.1 All employees, officers and office bearers of CUTS must ensure that they read, understand and comply with this policy. All are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.2 Any employee, officer and office bearer of CUTS who breaches this policy will face disciplinary action. for gross misconduct.

3.3 CUTS reserve its right to terminate its contractual relationship with its partners, grant recipients, and associates if they breach this policy.
