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**TANNU Software Pvt. Ltd.**  
*A software Development Company ..*

*An ISO 9001 : 2015 Certified Company*

**Registered Office:**

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New Delhi- 110092*

**Corporate Office:**

*207/C, Express View Apartment, Sector - 93,  
Noida- 201301*

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## 1. POLICY Statement

It is our (**TANNU Software Pvt. Ltd.**) policy to conduct all our business in an honest and ethical manner with integrity. This Anti-bribery and Corruption policy sets out **TANNU Software's** policies to prevent acts of bribery and corruption wherever it operates throughout the world.

## 2. APPLICABILITY of this Policy

The fundamental standards of integrity under which we operate, do not vary depending on where we work or who we are dealing with. This policy applies to all individuals working for the company anywhere in the world and at all levels and grades, including but not limited to senior managers, officers, directors, employees (whether regular, fixed-term or temporary), consultants, contractors, trainees, agents, or any other person associated with us, or any of our subsidiaries or their employees.

## 3. DEFINITION of this Policy

Bribery is an offer or receipt of any gift, loan, fee, reward or any other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust.

A bribe may be anything of value and not just money like Gifts, inside information, sexual or other favors, offering employment to a relative, corporate hospitality or entertainment payment or reimbursement of travel expenses, charitable donation or social contribution, abuse of function and can pass directly or through means that are illegitimate, immoral or incompatible with ethical standards.

Employee or Member of their immediate families (spouse, mother, father, son, daughter, brother, sister or any of these step or in-laws whether established by blood or marriage including common law marriage) should not provide, solicit or accept cash or its equivalent entertainment, favors, gifts or anything substance to or from competitors, vendors, suppliers, customers or others that do business or are trying to do business with **TANNU Software**

## 4. GIFT and HOSPITALITY

The Policy does not prohibit normal, reasonable, appropriate, modest and bona fide corporate hospitality and promotional or similar business expenditure such as calendars, diaries, pen (given and received) to or from third parties if its purpose is to improve the company's image, present our products and services, or establish cordial relations.

Gifts can occasionally be offered to celebrate special occasions (religious holidays or the birth of a child) provided such gifts are moderate in value, occasional, appropriate, totally unconditional and in-fitting with local business practices. No gift should be given or accepted if it could reasonably be seen improperly to influence the decision-making of recipient.

The practice of giving gifts and hospitality is recognized as an established and important part of doing business. However, it is prohibited when they are used as bribes. Giving gifts and hospitality varies between countries and sectors and what may be normal and acceptable in one country may not be so in another. To avoid committing a bribery offence, the gift or hospitality must be Reasonable and justifiable in all the circumstances and Intended to improve the image of **TANNU Software**, Better present its product and services or establish cordial relations.

## **5. WILLFUL BLINDNESS**

If an employee willfully ignores or turns a blind eye to any evidence of corruption or bribery within his / her department and / or around him / her, it will also be taken against the employee. Although the employee may not have directly participated in or may not have directly benefitted from the corruption or bribery concerned, the **willful blindness** to the same can, depending upon the circumstances, carry the same disciplinary action as an IPC act.

## **6. FACILITATION PAYMENTS and KICKBACKS**

The company does not make, and shall not accept, facilitation payments or **kickbacks** of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government/any other organization's action by an official. Kickbacks are typically payments made in return for a business favor or advantage. All associates must avoid any activity that might lead to a facilitation payment or kickbacks being made or accepted.

If an associate is asked to make a payment on behalf of the company, such associate shall at all times be mindful of the purpose of the payment and whether the amount requested is proportionate to the goods or services so provided. A receipt which details the reason for the payment should also be sought at all times. In case of suspicions, concerns or queries regarding a payment, the associate should raise the matter immediately with their reporting manager or consult an appropriate member of the Human Resource Team.

## **7. DONATIONS**

The company does not make contribution to the political parties which are so made to influence any decision or gain a business advantage. The Company only makes charitable donations that are legal and ethical under local laws and practices.

## **8. RESPONSIBILITIES OF ASSOCIATES**

Associate must ensure that they have read and understood this policy and, must at all times comply with the terms and conditions of this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All associates are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Associate must notify their reporting manager or consult an appropriate member of the HR team as soon as possible. If they believe or suspect, or have a reason to believe or suspect, that a breach of this policy has occurred, or may occur in future.

Any associate who breaches any of the term of this policy will face disciplinary action, which could result in dismissal for gross misconduct. The company reserves its right to terminate a contractual relationship with other associates and other associated persons, as the case may be if they breach any of the terms and conditions of this policy.

## **9. RAISING A CONCERN/COMPLAINT (Whistle blowing)**

Employees and Associates are encouraged to raise concern about any issues or suspicion of malpractice at the earliest possible stage. If an associate is unsure whether a particular act constitute a bribery or corruption, she/he should raise the matter with his/her reporting manager or consult an appropriate member of HR Team so that the incident can be properly recorded, reviewed and accounted for with the authorities.

## **10. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION**

If any associate is offered a bribe by a third party, is asked to make one, suspect s that this may happen in the future, or believes that he/she is, or anyone else is, a victim of any form of unlawful activity, such associate shall comply with clause 8 above.

## **11. PROTECTION**

Associates who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The company aims to encourage openness and will support anyone who raises genuine concern in good faith under this policy, even if they turn out to be mistaken.

The company is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If any associate believe that she/he has suffered any such treatment, she/he should

inform his/her reporting manager or a member of HR team immediately. If the matter is not remedied, and if the victim is an associate, she/he should raise the matter as per procedure laid out in the Whistle Blower policy.

## **12. TRAINING AND COMMUNICATION**

Dissemination of this policy for new joiners shall be carried out at the time of induction. This policy will also be shared with all existing associates. If any associate has any query about this policy, they should contact their reporting manager.

The company's zero tolerance approach to bribery and corruption should be communicated to all agents suppliers, contractors and business partners at the outset of the company's business relationship with them and as appropriate thereafter. Wherever possible, all such third parties should be sent a copy of this policy at the outset of the said business relationship.

## **13. WHO IS RESPONSIBLE FOR THIS POLICY ?**

The board of directors has overall responsibility for ensuring this policy complies with our legal & ethical obligations, and that all those under our control comply with it.

The concerned Head of HR (Human Resource) Team has primary and day to day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring that those reporting of them are made aware of and understanding this policy and, if necessary and appropriate, are given adequate and regular training on it.

## **14. MONITORING AND REVIEW**

The concerned Head of HR of team will monitor the effectiveness and review the implementation o of the policy, regularly considering its suitability, adequacy and effectiveness. any improvement identified will be made and incorporated as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in counting bribery and corruption.

All associates are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Associates are invited to comment on this policy and suggest ways in which it might be improve. Comments, suggestions queries should be addressed to the Head - HR team. This policy does not form part of the associate's contract of employment and it may be amended at any time by the company.

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