
ANTI-BRIBERY AND ANTI- CORRUPTION POLICY

S.No	Revision	Date	Prepared By	Approved By
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ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

IAN PROCUREMENT SOLUTIONS (Internal Policy and Declaration)

1. PURPOSE

IAN Procurement Solutions ("IAN") is committed to conducting its business with integrity, transparency, and in full compliance with applicable anti-bribery and anti-corruption laws.

This Policy establishes a zero-tolerance framework toward bribery, corruption, improper payments, and unethical conduct in all business dealings, including engagements with vendors, clients, public authorities, and third parties in India and internationally. This Policy is designed to ensure compliance with applicable Indian law, the UK Bribery Act 2010, and the US Foreign Corrupt Practices Act (FCPA), in addition to relevant anti-corruption laws in any jurisdiction in which IAN operates.

2. SCOPE

This Policy applies to:

- All employees
- Directors and management
- Contractors and consultants
- Temporary staff
- Third parties acting on behalf of IAN

Compliance with this Policy is mandatory and forms part of contractual obligations.

3. ZERO-TOLERANCE PRINCIPLE

IAN strictly prohibits:

- Offering, giving, soliciting, or accepting bribes
- Facilitation payments
- Kickbacks or hidden commissions
- Improper gifts or hospitality intended to influence decisions
- Manipulation of procurement processes
- Any conduct that may be perceived as corrupt or unethical

This prohibition applies regardless of local custom or business practice.

4. DEFINITIONS

4.1 Bribery

Offering, promising, giving, accepting, or soliciting anything of value to influence a business decision or gain an improper advantage.

4.2 Corruption

Abuse of entrusted power for private gain.

4.3 Facilitation Payments

Small unofficial payments made to expedite routine government or administrative actions. These are strictly prohibited.

5. GIFTS, HOSPITALITY, AND ENTERTAINMENT

IAN employees and representatives:

- Shall not offer or accept cash or cash equivalents
- Shall not offer or accept gifts that could influence business decisions
- May accept nominal hospitality only where:
 - It is reasonable and proportionate, and does not exceed USD 50 (or local equivalent) in value
 - It does not create a conflict of interest
 - It is compliant with client policies

Any gift or hospitality valued above USD 50 (or local equivalent) must be disclosed to management and logged in the Gifts & Hospitality Register.

6. PROCUREMENT INTEGRITY

Given IAN's role in procurement support services, the following controls apply:

- No employee may receive commission, incentives, or personal benefit from vendors.
- Vendor evaluations must be based solely on objective commercial and technical criteria.
- All vendor communication must remain professional and documented where appropriate.
- Undisclosed arrangements with suppliers are strictly prohibited.

Any attempt by a vendor to offer inducements must be immediately reported.

7. CONFLICT OF INTEREST

Employees and contractors must:

- Disclose any financial or personal relationship with vendors, suppliers, or clients.
- Avoid participation in procurement decisions where conflict exists.
- Refrain from engaging in outside employment that conflicts with IAN's interests.

Undisclosed conflicts may result in disciplinary action.

8. THIRD-PARTY REPRESENTATIVES

IAN shall not engage intermediaries, agents, or subcontractors who:

- Have known history of unethical conduct

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- Demand success fees linked to improper influence
 - Refuse to comply with anti-corruption undertakings

All third parties acting on behalf of IAN must comply with this Policy.

IAN will conduct proportionate due diligence on intermediaries, agents, and subcontractors before engagement, and will require written anti-bribery undertakings from any third party acting on IAN's behalf in connection with client engagements

9. RECORD KEEPING AND FINANCIAL CONTROLS

IAN maintains:

- Accurate and complete accounting records
- Transparent invoicing practices
- Documented commercial agreements

False, misleading, or incomplete records intended to conceal improper payments are strictly prohibited.

All payments must be made through legitimate banking channels.

10. REPORTING OBLIGATIONS

Any employee or contractor who becomes aware of:

- Suspected bribery or corruption
- Improper vendor conduct
- Undue influence attempts
- Conflicts of interest

Must report the matter immediately to management.

Reports shall be treated confidentially and investigated appropriately.

Retaliation against individuals who report concerns in good faith is strictly prohibited.

11. DISCIPLINARY ACTION

Violation of this Policy may result in:

- Formal warning
- Suspension of duties
- Termination of employment or contract
- Legal action where applicable

Serious violations may also be reported to relevant authorities.

12. TRAINING AND AWARENESS

IAN shall:

- Communicate this Policy to all personnel
- Provide awareness during onboarding and refresher training at least annually
- Reinforce ethical procurement standards through ongoing communication

Employees must acknowledge understanding of this Policy in writing at onboarding and at each annual refresher.

13. POLICY REVIEW

This Policy shall be reviewed periodically to ensure alignment with:

- Applicable anti-corruption laws
 - International client expectations
 - Business expansion into new jurisdictions
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DECLARATION

IAN Procurement Solutions formally declares that:

- It operates under a zero-tolerance policy toward bribery and corruption.
 - It does not permit facilitation payments, kickbacks, or undisclosed commissions.
 - It commits to ethical procurement practices in all engagements.
 - It maintains internal controls to prevent and detect improper conduct.
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End of Anti-Bribery and Anti-Corruption Policy