



PADALA CHARITABLE TRUST ANTI-CORRUPTION AND ANTI- BRIBERY POLICY



1. Objective

1.1 This Anti-Corruption and Anti-Bribery Policy outlines PADALA CHARITABLE TRUST commitment to preventing, detecting, and responding to corruption and bribery within the organization.

1.2 The Policy aims to uphold the highest standards of integrity and transparency, ensuring a corruption-free and ethical workplace.

1.3 The Policy complements applicable anti-corruption laws, including:

- The Prevention of Corruption Act, 1988
- The Indian Penal Code, 1860
- The Companies Act, 2013

2. Applicability

2.1 This policy applies to all employees, contractors, consultants, vendors, and any other third parties engaged with PADALA CHARITABLE TRUST at all locations, offices, and branches in India.

3. Prohibition of Corruption and Bribery

3.1 PADALA CHARITABLE TRUST strictly prohibits any form of bribery or corruption, which includes offering, giving, receiving, or soliciting anything of value to influence the actions of an individual in a position of power.

3.2 Employees and associated parties must not:

- Offer or accept bribes or other unlawful incentives to or from any person or organization, including public officials and private individuals.

- Make facilitation payments, which are small unofficial payments made to expedite routine governmental actions.
- Engage in any form of corruption, including fraud, embezzlement, or money laundering.

3.3 Employees must conduct due diligence and report any suspicious behavior or suspected incidents of corruption or bribery to the **HR Director** as soon as possible.

3.4 No person will face punishment, retaliation, or limitations in employment or other opportunities for reporting in good faith any suspected incidents of corruption or bribery, or for participating in an investigation.

4. Gifts and Hospitality

4.1 Employees of PADALA CHARITABLE TRUST may accept gifts, hospitality, or entertainment only if they are reasonable, proportionate, and transparent, and are not intended to influence or reward any decision-making process.

4.2 Any gift or hospitality exceeding the value of **INR 10,000** must be declared and approved by the CEO and approved by the board.

5. Training and Awareness

5.1 PADALA CHARITABLE TRUST will provide regular training and awareness programs to ensure that all employees understand and comply with the provisions of this Policy.

5.2 All employees must complete mandatory anti-corruption and anti-bribery training within the first three months of their employment and subsequently on an annual basis.

6. Monitoring and Enforcement

6.1 **PADALA CHARITABLE TRUST** will conduct regular audits and risk assessments to ensure compliance with this Policy.

6.2 Any violation of this Policy will result in appropriate disciplinary action, which may include termination of employment or contract and possible legal action, including referral to law enforcement authorities.

7. Reporting Mechanism

7.1 Employees and associated parties are encouraged to report any concerns or incidents related to corruption and bribery through the following channels:

- **HR Director**

7.2 The organization will ensure that all reports are investigated promptly and thoroughly, maintaining confidentiality and protecting the whistleblower from any form of retaliation.

8. Exception

8.1 This policy shall have no exceptions unless there are changes in any applicable laws relating to the subject, which have been reviewed and recommended by the **CEO and HR Director**.

9. Interpretation

9.1 Any matter not specifically covered under the above policy shall be referred to the HR Director for necessary advice.

9.2 The interpretation of this policy rests exclusively with **PADALA CHARITABLE TRUST**. The decision of **PADALA CHARITABLE TRUST** shall be final and binding.

10. Effective Date

10.1 This procedure supersedes all other earlier guidelines/rules on the subject matter and shall be deemed to have come into force with effect from 25-10-2024