

# **ANTI-BRIBERY and CORRUPTION POLICY**

## **Rucha Enterprises**

### **Purpose:**

This policy is drawn to ensure compliance with all applicable anti-bribery and corruption regulations to further ensure that Rucha Enterprises conducts business in a socially responsible manner.

### **Statement:**

An enticement for an illegal action or breach of trust caused by promising, giving, accepting or soliciting of an advantage is bribery. It is the policy of Rucha Enterprises to conduct business in an ethical manner along with a zero-tolerance for bribery and corruption. Rucha Enterprises is committed to acting professionally and with integrity while conducting business deals. We remain bound by the laws in India and Singapore in respect to our conduct all over the world.

### **Scope:**

Who is covered by the policy?

-Third party: any individual or organizations that we encounter such as potential clients, on-going customers, suppliers, distributors, agents, advisers, government bodies.

-Employees- all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, casual workers, or any of our subsidiaries or their employees, wherever located.

### **This policy covers the following:**

- 1) Bribes- Employees will not participate in any form of bribery defined above directly or through any third party.
- 2) Employees will not accept, or offer any gifts regarded as illegal or improper. All exceptions would be subject to approval in writing by employee's manager. In cases where it is not appropriate to decline the gift, it may be accepted and declared to immediate supervisor and donated to charity.
- 3) Facilitation payments and kickbacks- These payments made to expedite or facilitate performance of officials/obtain or retain business/ any improper business advantage will not be tolerated.
- 4) Political contributions- No donations whether cash or kind will be made in support of political parties or candidates and will be perceived as an attempt to gain an improper business advantage

### **Everyone working for or under the control of Rucha Enterprises have a responsibility to:**

- 1) avoid activities that lead to the breach of this policy
- 2) prevent, detect, and report bribery and corruption
- 3) notify manager OR director about breach of policy
- 4) raise concern about issue or suspicion of malpractice
- 5) No accounts will be kept `off-book` to facilitate or conceal improper payments.

**Policy control:**

Record-keeping must be ensured concerning finances, evidence of payments, accounts, gifts accepted or offered.

Rucha Enterprises will ensure openness and support to anyone who raises concerns in good faith, no one suffers detrimental treatment as a result of refusing to take part in bribery and corruption. It is important that you inform the company manager/ director if you're subjected to bribery and corruption.

All existing employees will receive regular training on this policy and all new hires will receive training as a part of orientation process. The director and proprietor of Rucha Enterprises are responsible for ensuring this policy complies with legal and ethical obligations and all those under our control MUST comply with it. The director is also responsible to monitor effectiveness and review implementation of this policy regularly.

All employees are responsible for success of this policy & ensure that they use it to disclose any suspected danger or wrongdoing.

Employees are invited to comment on this policy and recommend ideas which might help improve this policy.

This policy does not form part of any employee`s contract of employment & it may be amended at any time.