

WPIL Anti-Bribery And Anti-Corruption Policy

1. Introduction:

WPIL is committed to the setting up, utmost standards for transparency and accountability in all its affairs. WPIL strives in attaining its mission through compliance of high legal and ethical standards. WPIL maintains Zero tolerance for any form of bribery, embezzlements or corruption and will uphold all laws countering bribery, fraud and corruption in all forms.

2. Purpose:

The purpose of this policy is to set out the responsibilities of WPIL and those individuals acting on its behalf in observing and upholding WPIL's position on bribery and corruption. Every individual or group of individuals, associated to WPIL in any form, whether the staff members engaged in the activities of the organization, the consultants, the contractors, and any other party with a financial or trustee-beneficiary relationship with WPIL are expected to share this commitment. The basic objective of this statement is setting out the policy of WPIL towards the prevention and identification of bribery and corruption and the certain procedures to be followed, if at all, any fraud is found or having an idea / impression of its existence.

3. Scope:

This policy applies to the Staffs, Advisers, Consultants, Suppliers, and Individuals acting on behalf of the Society, irrespective of their location. Governing Body (GB) has been excluded from the scope, considering the fact that GB is not directly involved in any of WPIL day-to-day business and/or routine functions.

4. Statement:

WPIL will not engage in bribery or any form of unethical inducement or payment including facilitation payments and "kickbacks." All the Staff, Advisers, Consultants, Suppliers, and Individuals acting on behalf of the WPIL are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activities of WPIL.

WPIL expects its suppliers and others to act with integrity and without thought or actions involving bribery and/or corruption and will, where appropriate, include clauses to this effect in relevant contracts.

5. Prohibited Activities

- i) It is prohibited, directly or indirectly, for any staff or individual acting on behalf of WPIL to offer, give, request or accept any bribe (i.e. gifts with mala-fide intentions, reward or advantage, either in cash or any other form of inducement), to or from any person or company in order to gain commercial, contractual or regulatory advantage for WPIL or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.
- ii) This policy requires employees and individual acting on behalf of WPIL
 - a) Not to offer, promise or make any bribe or unethical payment or inducement of any kind to anyone;

- b) Not to solicit business by offering, promising or making any bribe or unofficial payment to suppliers.
- c) Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorized by WPIL in the ordinary course of business;
- d) To refuse any bribe or unusual payment and to do so in a manner that is not open or giving rise to false expectation; and to report any such offers;
- e) Not to make facilitation payments. These are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement. WPIL maintains zero tolerance or condone such payments being made;
- f) To report any breach of this policy's principles.

6. Criminal Offence (as defined in IPC)

i) It is a criminal offence to:

- a. Offer a bribe;
- b. Accept a bribe;
- c. Fail to prevent a bribe

ii) Employees, advisers, consultants, suppliers, and any individuals acting on behalf of WPIL should be made aware that if they are found guilty by a court of committing bribery, embezzlement or fraudulence, an individual could face prosecution as per the norms of IPC (Indian Penal Code).

7. **Gifts and Hospitality**

WPIL realizes that giving and receiving of gifts and hospitality without any mala-fide intentions, or in other words, where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

8. **Raising a concern**

i) If an employee or an individual acting on behalf of WPIL is offered a bribe, or a bribe is solicited from them, they should not agree to it unless their immediate safety is in jeopardy. Should this be the case, the employee or individual should at first instance contact the functional heads as soon as they are able to do so. The employee or individual may be required to give a written account of the events to assist with any investigation. If any functional heads is involved in such an act, the individual may contact Executive Director for reporting the case

ii) Employees or individuals acting on behalf of WPIL are encouraged to raise concerns about any instance of bribery or corruption at the earliest possible stage. The employee or individual raising a concern can do so in confidence and without fear of reprisals. All reports raised are taken seriously and, where appropriate, investigated. No employee or individual will be discriminated against in any way as a result of reporting a concern in good faith.

iii) If any instance of bribery or corruption is identified; WPIL management will take the remedial steps immediately. WPIL has its own system of investigating its staff member for violation of service conduct including financial irregularities, corruption, fraud or

embezzlement. If the charges are proved the delinquent may be awarded penalties depending on the gravity of misconduct.

These rules are based on the following principles:-

- a) The right of WPIL to take appropriate disciplinary steps against any delinquent staff member, who acts in a manner conflicting with the code of conduct and prescribed rules / regulations.
- b) At the same time the rules also recognize the right of delinquent staff member to a fair hearing and applicable and just disciplinary action.
- c) The emphasis of disciplinary action is on prevention, justice and rehabilitation.

9. **Review of this Policy:**

In the interests of maintaining best practice, the contents of this Anti-Fraud Policy will be reviewed by Managing Director at every three years.

10. **Reporting and Investigation:**

- i) An individual can report at two levels, as indicated below:
 - Functional head at primary level. or
 - Managing Director, depending on the merit of the case
- ii) **Investigation:**
 - Committees will be formed by senior management as nominated by managing Director to investigate.
 - Committee will submit the report upon completion of investigation to Managing Director for decision

The Management reserves the right to modify / change/ withdraw any part or whole of the Policy contents without assigning any reason with or without notice at any time at their sole discretion