

Anti-Corruption & Anti-Bribery Policy

Table of Contents

Sl. No.	Section Title	Page No.
1.	Document Control	2
2.	Revision History	2
3.	Purpose	3
4.	Scope	3
5.	Definitions, Policy Statement, Anti-Corruption Objectives and KPI's	3-4
6.	Anti-Corruption Governance Body	5-6
7.	Anti-Corruption Compliance Function	6-7
8.	Anti-Corruption Code of Conduct	7-8
9.	Gifts, Entertainment and Hospitality; Financial Control and Non-Financial Controls	8-9
10.	Third-Party Due Diligence	10
11.	New Staff Onboarding Awareness and Training	10-11
12.	Ongoing Anti-Corruption Communication, Awareness and Training; Employment Conditions, Protection and Personnel Due Diligence	11-12
13.	Investigation and Dealing with Corruption	13-14
14.	Corruption Reporting System (Whistleblowing Policy)	15
15.	Governance Body Review	15
16.	Disciplinary Action	16
17.	Approval	17

Anti-Corruption & Anti-Bribery Policy

1. Document Control

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2. Revision History

Version	Date	Description	Approved By
Version 2.0	20-10-2025	Initial release aligned with business requirements	HRBP & Chief Compliance Officer

Anti-Corruption & Anti-Bribery Policy

3. Purpose

The purpose of this policy is to define Wizertech Informatics Private Limited's approach to preventing, detecting, and responding to bribery and corruption.

The Company upholds a **zero-tolerance stance** toward any form of bribery, corruption, or improper business practices. This commitment aligns with the relevant **Indian anti-corruption legislation**.

This policy ensures that all business dealings are conducted ethically, transparently, and in full compliance with applicable laws and corporate values.

4. Scope

This policy applies to all individuals and entities associated with Wizertech, including but not limited to:

- Permanent and temporary employees;
- Board members and officers;
- Consultants, contractors, and agents;
- Vendors, suppliers, distributors, and partners;
- Any third party representing Wizertech in any capacity or jurisdiction.

All such parties are required to comply with this policy without exception.

5. Definitions

- **Bribery:** Offering, promising, giving, requesting, or accepting anything of value to influence a business decision or secure an improper advantage.
- **Corruption:** Abuse of entrusted power for private gain.
- **Facilitation Payment:** Small, unofficial payments made to expedite routine government actions (e.g., permits, customs). These are **strictly prohibited**.
- **Conflict of Interest:** A situation in which personal interests interfere or appear to interfere with professional duties or company interests.
- **Improper Advantage:** Any benefit obtained by unethical or illegal means.

Anti-Corruption & Anti-Bribery Policy

6. Policy Statement

Wizertech prohibits any form of bribery, corruption, or unethical conduct, whether direct or indirect, involving public or private sector entities.

All personnel must:

- Act with integrity and fairness in all business dealings.
- Avoid offering or accepting gifts or payments that may influence decisions.
- Refrain from making facilitation payments or political contributions intended to secure business advantages.
- Disclose any potential conflict of interest to management or the Compliance Department immediately.

Wizertech promotes an ethical culture where all employees are empowered to act responsibly and report concerns without fear of retaliation.

7. Anti-Corruption Objectives & KPIs

Wizertech Informatics Private Limited monitors compliance through defined **objectives and measurable KPIs**, including:

- 100% completion of mandatory anti-corruption training.
- Zero confirmed bribery or corruption incidents annually.
- Number and resolution rate of whistleblower reports.
- Percentage of vendors and partners completing compliance screening.
- Timeliness of investigations and closure of identified compliance gaps.

These indicators are reviewed periodically by the Compliance Department to assess program effectiveness and identify areas for improvement.

Anti-Corruption & Anti-Bribery Policy

8. Anti-Corruption Governance Body

To ensure effective implementation, oversight, and enforcement of this policy, Company has established an **Anti-Corruption Governance Body (ACGB)**.

Composition

The Anti-Corruption Governance Body shall consist of:

- **Chief Compliance Officer (Chairperson)-Moithili Raichoudhury**
- **Head of Sales- Soumyen Chakraborty**
- **Internal Audit Representative-Richa Sharma**

8.1. Roles & Responsibilities

- Approve and review Anti-Corruption & Bribery Policy; ensure legal and best-practice alignment.
- Conduct risk assessments and recommend controls to mitigate corruption risks.
- Oversee compliance, internal controls, and review audit findings.
- Supervise investigations, ensuring fair, transparent, and timely resolution.
- Promote ethical behavior through training and awareness programs.
- Report compliance and risk updates to management and Board; recommend improvements.

8.2. Authority

- Access relevant records, systems, and personnel for reviews or investigations.
- Recommend corrective actions, disciplinary measures, and system improvements.

8.3. Meetings

- Meet at least annually, or more often if needed.
- Maintain minutes through the Compliance Office.

9. Anti-Corruption Compliance Function

- Led by Chief Compliance Officer (CCO), reporting to ACGB and Board Audit Committee; supported by compliance officers and staff.
- Implements, monitors, and enforces anti-corruption policies.

9.1. Key Responsibilities:

- Roll out and enforce the Anti-Corruption Policy; ensure employee awareness.
- Conduct risk assessments; monitor transactions, approvals, and vendor interactions.
- Deliver training and awareness programs; maintain participation records.
- Receive, document, and investigate reports of suspected corruption; coordinate corrective actions.
- Maintain accurate records of compliance activities, investigations, and risk assessments.
- Provide periodic compliance updates to ACGB and senior management.

Anti-Corruption & Anti-Bribery Policy

9.2. Independence & Authority:

- Operates independently with authority to access documents, systems, and personnel.
- Recommend policy/process improvements and escalate serious violations to the Board Audit Committee.

9.3. Continuous Improvement:

- Regularly update procedures and training to align with legal requirements, industry best practices, and company operations.

10. Anti-Corruption Code of Conduct

The organization upholds a **zero-tolerance policy** toward all forms of corruption, bribery, and unethical conduct. Every director, employee, and business associate is required to act with integrity, transparency, and accountability in all business dealings.

Key principles include:

- **No Bribery or Corruption:** Offering, giving, soliciting, or accepting any form of bribe, kickback, or improper payment is strictly prohibited.
- **Gifts and Hospitality:** Must be reasonable, infrequent, and transparent; never intended to influence business decisions.
- **Conflict of Interest:** Employees must disclose any personal or financial interests that may affect impartial judgment.
- **Accurate Records:** All financial transactions must be properly recorded and supported by valid documentation.
- **Reporting Violations:** Employees are encouraged to report suspected misconduct through the Whistleblowing or Ethics Reporting System without fear of retaliation.

Anti-Corruption & Anti-Bribery Policy

- **Compliance and Accountability:** All personnel are required to complete periodic anti-corruption training and comply with the company's policies and procedures.

The Code is reviewed **annually** by the Compliance or Governance Body to ensure continued effectiveness and alignment with legal and partner requirements.

11. Gifts, Entertainment & Hospitality

To prevent conflicts of interest and undue influence:

- **Gift Limit:** Gifts up to INR 5,000 per individual per calendar year may be accepted or offered, provided they are modest, infrequent, and for legitimate business purposes.
- **Prohibited Items:**
 - Cash or cash equivalents (gift cards, vouchers).
 - Extravagant or frequent gifts.
 - Hospitality that may create the appearance of impropriety.
- **Approval Process:**
 - Any gift or hospitality exceeding the prescribed limits requires **written pre-approval** from the HR & Compliance Department and Management.
- **Record-Keeping:**
 - All approved or offered gifts and hospitality must be logged in the **Gift & Hospitality Register** maintained by HR & Compliance Team.

12. Financial Controls

- Segregation of duties for all financial transactions.
- Payments and purchases approved per Delegation of Authority.
- Accurate recordkeeping with supporting documents.
- Regular reconciliation of accounts and expenses.
- Periodic internal and external audits.
- Verified and approved reimbursements and vendor payments.

Anti-Corruption & Anti-Bribery Policy

13. Non-Financial Controls

- Adherence to Code of Conduct & ethics.
- Confidential whistleblower reporting.
- Disclosure of conflicts of interest.
- Compliance with gifts, hospitality, and entertainment policy.
- Regular anti-corruption training.
- Merit-based recruitment and promotions.
- Operational monitoring to detect risks.
- Prompt investigation and disciplinary action for breaches.

13.1. Responsibility

Finance: Ensures the effective implementation and enforcement of financial controls.

Compliance & Internal Audit: Monitors the operation of non-financial controls and provides reports to the ACGB.

All Employees: Adhere to the control procedures applicable to their respective areas of responsibility.

14. Third-Party Due Diligence

All third parties (partners, vendors, agents) must undergo due diligence before engagement.

This includes:

- Completion of a **Third-Party Due Diligence Checklist**.
- Risk-based assessment and scoring based on geography, industry, and nature of services.
- Verification of ownership, reputation, and potential red flags (e.g., government affiliations).
- Documentation of findings and retention of evidence for a minimum of five years.

Anti-Corruption & Anti-Bribery Policy

Third-party engagements must not proceed until the Compliance Department provides formal clearance.

15. New Staff Onboarding (Anti-Corruption Awareness, and Training)

This program ensures all new employees understand the Company's zero-tolerance approach to bribery and corruption from their first day. It promotes ethical conduct, compliance awareness, and the ability to identify and report misconduct.

Scope: All new hires, including permanent, probationary, contractual, temporary staff, interns, and trainees.

Objectives:

- Introduce Company values of integrity and transparency.
- Familiarize employees with the Anti-Bribery and Corruption Policy and Code of Conduct.
- Explain bribery, corruption, facilitation payments, and conflicts of interest.
- Highlight red flags and high-risk situations.
- Provide reporting channels and whistleblower protections.
- Reinforce ethical and legal compliance expectations.

15.1. Training Content:

Covers relevant laws, the Company's zero-tolerance policy, bribery risks in ITES operations, gifts and hospitality rules, conflict-of-interest management, reporting procedures, and consequences of violations.

15.2. Delivery:

Conducted by Compliance or HR through self paced training. Policy acknowledgment is required. Training must be completed within 60 days of joining.

Anti-Corruption & Anti-Bribery Policy

15.3. Certification & Records:

New employees must sign an Anti-Corruption Declaration. HR keeps attendance and declarations; Compliance tracks completion and reports issues to the ACGB.

15.4. Ongoing Awareness:

Includes annual refresher training, periodic compliance communications, and updates on policy or legal changes.

16. Ongoing Anti-Corruption Communication, Awareness, and Training

The Company ensures continuous anti-corruption awareness so all employees and contractors stay informed about legal requirements, company policies, and emerging risks.

16.1. Scope:

Applies to all employees and managers.

16.2. Objectives:

- Reinforce ethical behaviour and the zero-tolerance stance on corruption.
- Keep staff updated on policy or legal changes.
- Help employees identify and manage corruption risks in daily work.
- Maintain awareness of reporting channels and whistleblower protections.
- Promote consistent ethical decision-making.

17. Employment Conditions, Protection, & Personnel Due Diligence

The Company promotes fair employment, protects employees, and uses proper screening to reduce corruption risks.

17.1. Employment Conditions:

- Employees receive clear, fair, and compliant contracts outlining roles, reporting lines, and compliance duties.
- Performance and promotions are based on merit and ethical conduct.

17.2. Employee Protection:

- Whistleblowers are protected from retaliation.
- Confidential reporting channels and support are available.

17.3. Personnel Due Diligence:

- Background checks for all new hires; additional checks for sensitive roles.
- Contractors and temporary staff undergo appropriate screening.
- Periodic reviews ensure continued compliance.

Anti-Corruption & Anti-Bribery Policy

17.4. Responsibilities:

- HR: Conducts due diligence and manages employee records.
- Compliance: Oversees screening and monitors adherence.
- Managers: Reinforce ethical expectations.

This helps maintain integrity and minimize corruption risks.

17.5. Communication Methods:

- Regular emails or newsletters with compliance tips and reminders.
- Posters and awareness materials displayed in offices.

17.6. Ongoing Training:

- Mandatory annual anti-corruption refresher training for all employees.
- Additional training for high-risk roles (e.g., procurement, sales).

17.7. Monitoring:

- Compliance reviews completion rates, gathers feedback, updates materials, and reports to the ACGB.

This ensures anti-corruption awareness is maintained continuously, not just during onboarding.

18. Investigation and Dealing with Corruption

The Company investigates all suspected corruption promptly, fairly, and confidentially.

Anti-Corruption & Anti-Bribery Policy

Reporting:

Reports can be made through the Whistleblowing System or to Compliance/Ethics, including anonymously.

18.1. Investigation:

- Acknowledge report within 7 days.
- Conduct a preliminary review.
- Assign independent investigators.
- Collect evidence, interview parties, maintain confidentiality.
- Submit findings and recommended actions to management or relevant committees.

18.2. Actions:

Confirmed cases may lead to disciplinary action.

18.3. Protection:

Whistleblowers and witnesses are protected from retaliation.

18.4. Records:

Investigation registers are managed by ACGB.

18.5. Improvement:

Compliance reviews the process annually and updates training and controls.

Anti-Corruption & Anti-Bribery Policy

19. Corruption Reporting System (Whistleblowing Policy)

The Company provides a secure and confidential way to report actual or suspected corruption, bribery, fraud, or unethical behavior without fear of retaliation.

- Email: hr-dept@wizertech.in
- Whistleblower Email : [employee_care@wizertech.com]
- Direct reporting to the Compliance Head or HR

Reports may be made anonymously. All reports will be:

- Treated with strict confidentiality.
- Investigated promptly and objectively.
- Protected from any form of retaliation or discrimination under the **Non-Retaliation Policy**.

Employees are encouraged to report concerns in **good faith** without fear of negative consequences.

20. Governance Body Review

The **Compliance Committee** will conduct annual or periodical reviews to evaluate:

- Anti-corruption KPIs and trends.
- Status of mandatory training completion.
- Investigation outcomes and corrective actions.
- Updates to laws, regulations, or Cisco CPCA requirements.

Recommendations from these reviews will be submitted to the **Managing Director** for approval and implementation.

Anti-Corruption & Anti-Bribery Policy

20.1. Roles & Responsibilities

Role	Key Responsibilities
Management	Promote ethical leadership, ensure policy enforcement, allocate resources for compliance programs.
HR & Compliance Department	Maintain the policy, conduct due diligence, training, audits, and investigations.
Employees	Adhere to policy requirements, complete training, report violations promptly.
Third Parties	Abide by Wizertech Informatics Private Limited's Anti-bribery and corruption standards and cooperate during reviews.

21. Disciplinary Action



Any employee or third party found to have violated this policy may face:

- Written warning or suspension;
- Termination of employment or business relationship;
- Reporting to legal or regulatory authorities;
- Potential legal consequences under applicable anti-corruption laws.

Disciplinary measures will be applied consistently and fairly.

Anti-Corruption & Anti-Bribery Policy

23. Approval

Role	Name / Signature	Date
Director & Chief Compliance Officer	Moithili Raichoudhury 	13-11-2025
HRBP	Ankhi Chatterjee 	13-11-2025