Anti-Bribery & Anti-Corruption Policy

Sr. No.	Version	Effective date
1.	V2	August 13, 2025
2.	V3	February 09, 2026
3.	V4	November 06, 2026

Anti-Bribery & Anti-Corruption Policy

1) Policy Statement

MITCON is committed to conducting its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships wherever we operate.

This Policy ensures compliance with all applicable anti-bribery and corruption laws, including the **Indian Prevention of Corruption Act, 1988**, and aligns with the requirements of **ISO 37001:2025 Anti-Bribery Management System (ABMS)**.

2) Purpose

The purpose of this Policy is to:

- Establish robust systems and controls to prevent, detect & reduce risks related to bribery and corruption.
- Promote a culture of integrity and accountability.
- Ensure business is conducted in a socially responsible and ethical manner.
- Provide guidance to employees and third parties on how to recognize and deal with bribery and corruption.

3) Scope

This Policy applies to:

- All levels of employees (permanent, temporary, fixed-term, trainees, and interns),
- Directors (Other than Independent Director) and officers,
- Contractual and seconded staff,
- Consultants, agents, contractors, suppliers, vendors,
- Business partners, sponsors, and third-party representatives,
- Any individual or entity acting on behalf of or representing MITCON globally.

4) Policy Objectives

MITCON seeks to:

- Establish a culture of compliance, transparency, and ethical behaviour.
- Minimize bribery and corruption risks to the organization.
- Set clear responsibilities for employees to comply with anti-corruption laws.
- Encourage vigilance and responsible reporting of any unethical activity.
- Investigate all reported concerns and take prompt disciplinary and legal actions, where appropriate.
- Ensure a uniform understanding among stakeholders of MITCON's zero-tolerance stance on corruption.

5) Coverage Areas

This Policy specifically prohibits and governs:

- Bribes: Offering, giving, receiving, or soliciting anything of value to influence decisions.
- Gifts and Hospitality: Only modest and appropriate gifts/hospitality may be accepted or offered, and only with transparency and proper documentation.
- Facilitation Payments: Prohibited under all circumstances, even where customary or expected.
- Political Contributions: Prohibited unless approved by the Board and in compliance with applicable laws.
- Charitable Donations: Allowed only with proper due diligence and approval to ensure legitimacy and compliance.

6) Roles and Responsibilities

All Employees Must:

- Familiarize themselves and comply with this Policy.
- Avoid any activity that might lead to or suggest a breach of this Policy.
- Promptly report any suspicion or knowledge of a violation.

Senior Management and Directors Must:

- Promote a culture of integrity.
- Ensure implementation of adequate procedures to prevent bribery.
- Lead by example and demonstrate commitment to compliance.

7) Anti-Bribery Function:

An Anti-Bribery Function has been constituted in line with the requirements of ISO 37001:2025. The ABF is entrusted with the authority and responsibility to oversee, monitoring, and deal in the all matters related to the Anti-Bribery and Anti-Corruption.

Responsibilities of the Anti-Bribery Function include:

- Overseeing the design, implementation, and continuous improvement of the Anti-Bribery Management System (ABMS), ensuring it remains effective and compliant with applicable laws, regulations, and ISO 37001:2025 standard.
- Monitoring the implementation and effectiveness of anti-bribery controls and procedures across the organization.
- Advising and supporting all employees, departments, and relevant third parties on bribery related matters, including risk mitigation strategies, interpretation of policies, and compliance requirements.
- Raising awareness and delivering training programs to ensure employees understand their roles and responsibilities.
- Receiving, investigating, and addressing reports or concerns related to potential bribery or corruption violations, with full authority and confidentiality.
- Reporting on the performance of ABMS to Board of Directors and top management

Composition of the Anti-Bribery Function team:

- Deputy Lead – Secretarial as ABFO
- Management Representative (MR)

Reporting Structure:

- The Anti-Bribery Function Team reports **directly to the Board of Directors** on all matters related to the Anti-Bribery and Anti-Corruption, ensuring independence and objectivity.
- The Team has **independent authority** to initiate and conduct investigations into suspected or confirmed violations of this Policy.
- It shall **periodically review** the Anti-Bribery and Anti-Corruption Policy to evaluate its relevance, adequacy, and effectiveness in addressing current and emerging risks.
- The Team is also empowered to **recommend disciplinary, corrective, or legal action** in case of non-compliance or breaches of the applicable anti-bribery laws.

8) Reporting and Whistleblowing

Employees and third parties are encouraged to raise concerns or report actual or suspected bribery or unethical conduct in good faith without fear of retaliation. Reports can be made to the Anti-Bribery Function Officer (ABFO) or through the Whistle-blower mechanism. All reports will be investigated confidentially and thoroughly.

9) Governing Body Reporting

Annual & in immediately next Board Meeting in case of occurrence of non-compliance.

10) Non-Compliance and Disciplinary Actions

Any breach of this Policy may result in:

- Disciplinary action, including termination of employment or contract,
- Legal proceedings, including prosecution under applicable laws,
- Blacklisting of vendors or partners involved in violations.

Attempts to circumvent the policy, manipulate records, or bypass controls will be treated as a serious offense.

11) Policy Review and Improvement

This Policy shall be reviewed upon significant changes in law, business operations, or internal processes. MITCON is committed to continuous improvement of its Anti-Bribery Management System and organizational culture.

12) Training and Awareness

All the employees have been informed and explained that strict action as per the conduct rules of the organization in case non-compliance of anti-bribery policy.

Further, regular training sessions and communication shall be conducted to ensure all relevant stakeholders understand their responsibilities under this Policy and applicable laws.

Company shall ensure the awareness through induction for new employees and once in a year training session for all employees