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Corporate Office
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Borivali West, Indusind Bank Building, Mumbai- 400092.

“Foundation to Landmark, brick by brick”

www.kutirgroup.in

KUTIR GROUP - ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Our Commitment

KUTIR GROUP is committed to conducting business with the highest standards of honesty and ethical integrity. This Anti-Bribery and Anti-Corruption Policy ("the Policy") communicates our zero-tolerance approach to bribery and corruption to all our stakeholders. We operate in full compliance with the legal framework of anti-corruption legislation in India and all other jurisdictions where we do business.

This Policy applies to KUTIR GROUP Ltd and all its subsidiaries and associated entities. Any reference to "KUTIR GROUP" or "the Organization" in this document refers to all such entities.

2. Policy Statement

Corruption is the abuse of public or private office for personal gain.

Bribery is the act of offering, promising, giving, accepting, or soliciting an advantage to illegally or unethically influence an action.

KUTIR GROUP is dedicated to acting professionally, fairly, and with integrity in all our business dealings. We have implemented robust internal controls to prevent bribery and corruption and will pursue legal and disciplinary action against any violations.

3. Scope and Applicability

This Policy applies to all individuals associated with KUTIR GROUP, including:

- Directors, senior managers, and officers
 - Permanent, fixed-term, and temporary employees
 - Trainees, seconded staff, casual workers, and agency staff
 - Volunteers, interns, agents, sponsors, and any other third parties acting on behalf of the Organization.
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4. Prohibited Misconduct

This Policy prohibits the following acts of misconduct, which are considered violations:

a) Bribes: Employees must not offer, promise, give, accept, or solicit any form of bribe, whether directly or through a third party.



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b) Gifts and Hospitality:

- Employees must **not** give or offer gifts or hospitality that are illegal, improper, or could be seen as an attempt to improperly influence a business decision. This includes gifts to public officials, government representatives, or politicians.
- Employees may **not** accept any gift or hospitality from business partners that:
 - Exceeds **INR 500/-** in value per individual gift.
 - Is given in cash.
 - Creates an explicit or implied expectation of a favor in return.
- Any accepted gift exceeding the value limit must be declared to a superior immediately. Failure to do so will be considered a policy violation.

c) Facilitation Payments and Kickbacks: KUTIR GROUP and its representatives are **strictly prohibited** from making facilitation payments. These are payments made to expedite or secure a routine action by an official. Unauthorized discounts or cash sales considerations are also prohibited.

d) Political and Charitable Contributions:

- **Political contributions** are only permitted with the prior, written approval of the Board of Directors. They must not be linked to gaining an improper business advantage.
- **Charitable donations** are encouraged but must be legal and ethical under local laws. They must never be used as a scheme to conceal bribery. We prioritize charitable activities that align with Corporate Social Responsibility provisions.

e) Red Flag Instances: Any of the following "red flags" must be reported immediately:

- A third party being accused of improper business practices.
- A third party demanding an upfront commission or fee before signing a contract.
- A third party requesting cash payments or refusing to provide a formal invoice.
- A third party requesting unexpected additional fees to facilitate a service.
- A third party demanding lavish entertainment or gifts to commence or continue negotiations.

f) Other Prohibited Practices: This policy also strictly prohibits:

- Misappropriation of property/money, criminal breach of trust, or cheating.
- Giving cash gifts on behalf of the Organization.
- Making charitable donations to gain commercial advantages.
- Payment of costs for government officers or their relatives for commercial gain.



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- Retaliating against any employee who refuses to commit a bribery offense or raises a concern under this Policy.

5. Reporting and Investigation of Misconduct

How to Report:

Any suspected case of bribery or corruption must be reported in writing to the Chairperson of the Anti-Corruption Committee within 5 working days of the incident.

Anti-Corruption Committee:

The committee is responsible for investigating all complaints and includes:

- **Chairman:** Managing Director
- **Members:** Legal Head, HR Head, Risk Head, and Sr. VP/VP Finance

Investigation Process:

- Upon receiving a complaint, an investigation will be launched immediately.
- The alleged respondent will be notified, and all relevant individuals, including the complainant and the respondent, will be interviewed.
- We will ensure the confidentiality and privacy of all parties involved.
- The first round of investigation and conclusion will be completed within **10 working days**.
- If the complaint is not substantiated, no documentation will be placed on the respondent's file. However, all records will be retained for 12 months in case of an appeal.

Appeals:

- A written appeal can be submitted to the **Chairman/Vice Chairman of the company** within **10 days** of the initial investigation's conclusion, stating which aspects of the investigation were inadequate.
- If the appeal is accepted, the same committee, with the addition of an independent member, will complete a new investigation within **15 working days**. The result of this appeal will be final.

6. Controls, Monitoring, and Consequences

- **Internal Controls:** All business transactions must have checks and balances in place, with verification performed by an employee from a different department.
- **Compliance Measurement:** We will monitor compliance through internal and external audits, self-assessments, and feedback. The Finance Department will maintain detailed records of all entertainment, gift, and travel expenditures.



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- **Exceptions:** Any exceptions to this Policy must be approved by the Managing Director and, where relevant, reported to the Board of Directors.
- **Non-Compliance:** Violations of this Policy, including any attempt to circumvent it, will result in severe disciplinary action, which may include termination of employment, in accordance with local laws.

Gaurav Trivedi

Executive Director, KUTIR GROUP