



Anti-Bribery & Anti-Corruption Policy

At Cosmos International Training Institute (CITI), we are committed to conducting our business with integrity, transparency, and accountability. We adhere to the highest ethical standards and prohibit bribery and corruption in all forms. This Anti-Bribery & Anti-Corruption Policy reflects our commitment to combating bribery and corruption in all aspects of our operations.

1. Policy Statement

1.1 Zero Tolerance: CITI has a zero-tolerance approach to bribery and corruption. We prohibit the offering, solicitation, acceptance, or facilitation of bribes or corrupt practices in any form, whether directly or indirectly.

1.2 Compliance with Laws: CITI complies with all applicable anti-bribery and anti-corruption laws and regulations, including the Prevention of Corruption Act, 1988, in India, and similar legislation in other jurisdictions where we operate.

2. Prohibited Conduct

2.1 Bribery: CITI prohibits the offering, promising, giving, soliciting, or accepting of any bribe, kickback, or improper inducement, whether in cash or in kind, to or from any person or entity, including government officials, customers, suppliers, or business partners.

2.2 Facilitation Payments: CITI does not tolerate facilitation payments, which are small payments or gifts made to expedite routine government actions or services.

2.3 Gifts and Hospitality: CITI recognizes that legitimate business gifts and hospitality are customary in many cultures. However, gifts and hospitality must be reasonable, proportionate, and transparent, and should not be offered or accepted with the intent to influence business decisions.

3. Due Diligence and Risk Assessment

3.1 Third Parties: CITI conducts due diligence on all third parties, including agents, consultants, suppliers, and business partners, to assess bribery and corruption risks associated with the engagement.

3.2 Risk Assessment: CITI periodically assesses bribery and corruption risks in its operations and implements appropriate controls and mitigation measures to prevent and detect potential violations.

4. Reporting and Whistleblowing

4.1 Reporting Channel: CITI provides a confidential reporting channel for employees, contractors, and stakeholders to report suspected instances of bribery or corruption. Reports can be made anonymously if preferred.

4.2 Non-Retaliation: CITI prohibits retaliation against individuals who report suspected bribery or corruption in good faith. Any acts of retaliation will be subject to disciplinary action.

5. Training and Awareness

5.1 Training Programs: CITI provides training and awareness programs on anti-bribery and anti-corruption policies and procedures to all employees, contractors, and relevant stakeholders to ensure understanding and compliance.

6. Compliance Oversight

6.1 Compliance Officer: CITI appoints a designated compliance officer responsible for overseeing the implementation and enforcement of this Anti-Bribery & Anti-Corruption Policy.

7. Consequences of Non-Compliance

7.1 Disciplinary Action: Violations of this policy may result in disciplinary action, up to and including termination of employment or contractual relationship, and legal consequences as appropriate.

8. Contact Information

For inquiries or to report suspected instances of bribery or corruption, please contact:

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Managing Director

Date:9-Jan-2024