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Anti Corruption Policy
Version 2.0

Document Revision History

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1. Introduction

1.1 Purpose

Secureminds Private Limited ("Secureminds") is committed to conducting its business with the highest ethical standards and integrity. This Anti-Corruption Policy outlines the company's stance against bribery and corruption and provides guidance to all employees, directors, contractors, and third parties acting on behalf of Secureminds.

1.2 Scope

This policy applies to:

- All employees (permanent, temporary, and contractual)
- Directors and officers
- Vendors, suppliers, agents, consultants, and third-party representatives
- Joint venture partners and business associates

1.3 Definitions, Acronyms, and Abbreviations

Acronym or word	Definition / Explanation
Bribery	Offering, promising, giving, accepting, or soliciting of an undue advantage (financial or otherwise) to influence an act or decision.
Corruption	Abuse of entrusted power for private gain.
Facilitation Payments	Small, unofficial payments made to expedite routine actions — these are strictly prohibited.

2. Policy Statement

Secureminds has a zero-tolerance approach to bribery and corruption. Offering, giving, soliciting, or receiving bribes in any form is strictly prohibited, whether directly or indirectly through third parties.

3. Prohibited Conduct

Secureminds employees and partners must not:

- Offer or receive bribes or kickbacks in any form
- Make facilitation payments to government or non-government actors
- Offer gifts, hospitality, or entertainment to influence decisions
- Use company funds for political contributions without proper authorization
- Conceal or falsify records to cover up bribery or corrupt practices

4. Gifts and Hospitality

- All gifts and hospitality must be reasonable, proportionate, and for legitimate business purposes.
- Gifts should never be given or accepted with the intention of gaining improper influence.

- All gifts and entertainment exceeding a pre-defined value (INR 5,000) must be reported and approved by the Compliance Officer.

5. Due Diligence and Third Parties

- Third parties acting on behalf of Secureminds must undergo risk-based due diligence.
- All third-party contracts must include anti-corruption clauses.
- Secureminds reserves the right to terminate relationships with third parties engaged in corrupt activities.

6. Responsibilities

- **Employees:** Must avoid any activity that could lead to, or suggest, a breach of this policy.
- **Managers:** Must promote an ethical culture and ensure staff understand and comply with the policy.
- **Compliance Officer:** Responsible for policy oversight, training, monitoring, and investigation of violations.

7. Reporting Violations

Employees are encouraged to report concerns about bribery or corruption through:

- Anonymous whistleblower channel
- Email to: compliance@secureminds.pro

No retaliation will be tolerated against whistleblowers acting in good faith.

8. Enforcement

Violation of this policy and all related documents may be subjected to disciplinary action.