

ICS INTERNATIONAL CERTIFICATION



ANTI-BRIBERY POLICY

Purpose of this Guideline (“GL”)

This document sets forth additional guidelines specific to ICSIC (“ICS International certification”) in this document stands for all direct and indirect Interested parties of ICSIC in India as well as globally and should be read in conjunction with Anti-Corruption and Anti-Bribery Policy.

The objective of this document is to enable ICSIC employees to identify and avoid situations that could potentially violate anti-bribery and anti-corruption laws of India and globally. In particular, no ICSIC employee will offer any bribe to any person, any accreditation Body, government or public official and not accept any bribe and/or engage from any Consultant, client or any other person in any form of indirect bribery by offering or receiving any bribe through a third party.

Scope of Application

The Anti-Corruption and Anti-Bribery Policy and the guidelines set forth in this document are applicable to all employees of ICSIC. Additionally, it applies to all, consultants, agents, Accreditation Body, Freelancer auditor in India as well as globally such other third parties and their representatives acting for and on behalf of ICSIC.

Compliance with the Policy and the guidelines is **mandatory**; any instance of non-compliance shall result in disciplinary actions, including monetary sanctions and dismissal from the Company or termination of contract.

Definitions

➤ Anything of Value:

An indicative list would comprise cash, cash equivalents like gift vouchers, gifts, gratuities, travel, meals, discount, loan, fee, reward, entertainment and offers of employment, education or other financial or nonfinancial advantage. This could also include event sponsorships, consultant contracts, and charitable contributions made at the request of, or for the benefit of, any person, corporate or a Government Official, their family, or other relations, even if made to a bona fide charity.

➤ Government Entity:

This includes international, national, state or local governments or government departments, bodies, agencies, political parties, as well as government-owned or controlled commercial enterprises, regardless of full or partial government ownership or control.

Questions regarding whether a particular person or entity should be treated as a Government Official or instrumentality, should be directed to the local Compliance Manager. In case of any doubt, always assume that the person / entity are a Government Official or entity.

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1.1. When Gifts and Entertainment should be Rejected

If you are offered or receive a gift or invitation which does not comply with this Guideline, you are advised to undertake the following actions:

- Where possible do not accept and politely reject the gift or invitation; and promptly intimate the local Compliance Manager;
- If you cannot reject the gift, due to cultural sensitivity or other reasons, you may receive it but subsequently these need to be declared and surrendered to the Compliance Manager. The company will decide the procedure for utilization/disposal of such gifts.

1.2 Recording of Gifts and Entertainment Expenses Offered and Accepted:

In all instances, details of all gifts/ entertainment expenses offered or accepted must be entered in the “Gift and Entertainment Register”. The Compliance Manager would ensure that a Gift and Entertainment Register is maintained at every location of the India Business.

Dated 01.05.2022

Certification Manager
Mr. Arpan Shah