

## **Outline India Research Private Limited** **Anti-Bribery and Anti-Corruption Policy**

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### **1. Purpose**

This policy outlines Outline India's commitment to conducting business in an honest, transparent, and ethical manner. We have zero tolerance for bribery and corruption in any form, whether direct or indirect.

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### **2. Scope**

This policy applies to:

- All employees (full-time, part-time, consultants, interns)
  - Directors and officers
  - Third-party vendors, field investigators, partners, and subcontractors acting on behalf of Outline India
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### **3. Definitions**

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence a decision or gain an unfair advantage.
  - **Corruption:** Abuse of entrusted power for private gain, including fraud, kickbacks, or misappropriation of funds.
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### **4. Prohibited Activities**

Outline India strictly prohibits:

- Giving or receiving bribes, kickbacks, or facilitation payments
  - Offering gifts, hospitality, or services intended to improperly influence decisions
  - Making payments to public officials or clients to gain business advantage
  - Concealing or misrepresenting facts in financial records
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### **5. Reporting and Whistleblowing**

- Employees and stakeholders are encouraged to report any suspected bribery or corruption to the designated compliance officer or management. Reports can be made confidentially and without fear of retaliation.
  - Outline India is committed to protecting whistleblowers from any form of retaliation. Any retaliation will itself be considered a serious policy violation.
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## 6. Disciplinary Action

Any employee or third party found in violation of this policy will face disciplinary action, including termination of employment or contract, and may be reported to appropriate legal authorities.

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## 7. Training and Awareness

All employees are made aware of this policy at the time of joining, and periodic training is conducted to reinforce ethical practices.

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## 8. Compliance with Laws

This policy aligns with the **Prevention of Corruption Act, 1988 (India)** and any other relevant donor or sectoral requirements applicable to Outline India's work in the development and research sector.

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## 9. Review

This policy will be reviewed annually or as needed to ensure continued relevance and compliance with legal and ethical standards.

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## 10. Add Record-Keeping Obligations

- All transactions and expenses must be recorded accurately and transparently. False or misleading documentation is strictly prohibited.
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### Approved by:

Management – Outline India Research Private Limited