

ANTI-CORRUPTION & ANTI-BRIBERY POLICY

Introduction

The Export-Import Bank of India (Exim Bank) is strongly committed to excellence in every aspect of its functioning and existence. The Bank is created and sustained by the citizens of India and an employee of the Bank has a duty and responsibility towards them as stewards of their trust and the public funds of India. In all actions, an employee of the Bank is guided by the knowledge and acceptance of this responsibility. The Bank commits that all its dealings with its stakeholders shall be based on a foundation of Integrity, Transparency and Respect and unfailingly abide by the letter and spirit of laws and regulations.

The Bank has a zero-tolerance approach to bribery and corruption and is committed to act professionally, fairly and with integrity in all its dealings to implement and enforce effective systems to counter bribery. The employees of the Bank are prohibited from engaging in any bribery or potential bribery cases. This includes a prohibition against both direct and indirect bribery/corruption, including payments through third parties. If any associate suspects or becomes aware of any potential bribery/corruption involving the Bank, it is the duty of that employee to report their suspicion or awareness to the appropriate authority i.e. Chief Vigilance Officer (CVO) / Managing Director (MD) of the Bank.

Scope and Applicability

This policy is to be read in conjunction with the 'Export-Import Bank Officers' Conduct, Discipline and Appeal Regulations, 2020. This policy applies to all the employees (trainees, interns, permanent or on contract) of the Bank. In this policy, third party will mean any individual or organization that an employee may come into contact with during the course of his / her engagement with the Bank, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, business associates and government and public bodies including their advisors, representatives and officials, politicians and political parties.

Policy

A bribe is an inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage. It is illegal to directly or indirectly offer a bribe or receive a bribe. It is also an offence to bribe a government / public official.

“Government / public official” includes officials, whether elected or appointed, who hold a legislative, administrative or judicial position of any kind in the country or territory.

A bribe may be anything of value and not just money, gifts, inside information, sexual or other favors, corporate hospitality or entertainment, offering employment to a relative, payment or reimbursement of travel expenses, charitable donation or social contribution, abuse of position / function that can pass directly or through a third party.

Corruption includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral or incompatible with ethical standards. Corruption often results from patronage and is associated with bribery.

It is not acceptable for any employee to:

- (i) Accept an offer of a gift of any size from any third party which is in negotiation with or is submitting a proposal with the Bank.
- (ii) Give, promise to give or offer, any payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure.
- (iii) Accept or solicit any payment, advantage, gift or hospitality from a third party that you know or suspect is being offered with the expectation that it will obtain a business advantage for them.
- (iv) Threaten or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this Policy.
- (v) Engage in any activity that might lead to a breach of this Policy.

The points stated above are illustrative in nature and in no way intend to limit the applicability of this Policy.

Procedure

(i) How to raise a concern?

Every employee, to whom this policy applies must raise their concerns about any bribery issue or suspicion of malpractice as soon as it is noticed. If he/she is unsure whether a particular act constitutes bribery or corruption or if he/she has any other queries, these should be raised with their respective reporting manager or Chief Vigilance Officer or Managing Director of the Bank. The complaint should be in

writing with statement of facts, probable effect/potential to cause financial or reputational loss to the Bank and in a sealed confidential envelop marked to respective reporting manager or Chief Vigilance Officer or Managing Director of the Bank. The information should be sent by disclosing the identity and not anonymously. The complaint may be raised with the appropriate authority within 30 days from the date of occurrence of the incident.

(ii) What to do if an employee is a victim of bribery and corruption?

The employee must report it to the Chief Vigilance Officer or Managing Director of the Bank as soon as possible, if employee is offered a bribe by a third party, or asked to make one, or made a victim of another form of corruption or other unlawful activity. Employee must refuse to accept or make the payment from or to a third party and explain about Bank's policy against accepting or making such payment and make it clear that the refusal is final and non-negotiable.

(iii) Protection:

Employees who refuse to accept or offer a bribe or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Bank is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corrupt activities or because of reporting their suspicion in good faith that an actual or potential bribery or a corruption offence has taken place or may take place in the future. If any employee believes that he / she has suffered any such treatment, he / she should inform Chief Vigilance Officer or Managing Director of the Bank immediately.

(iv) Maintaining Accurate Books and Records:

No payment by or on behalf of the Bank shall be approved or made if any part of the payment is to be used for an unlawful purpose, or for any purpose other than that described by valid documents supporting the payment. No false or misleading entries should be made in any books or financial records of the Bank for any reason.

Any expense that an employee or third party incurs on the Bank's behalf or in connection with the Bank's business shall not be reimbursed unless they are lawful and supported by detailed documentation including, for example, valid invoices or receipts.

Breach and Penalties

The breach of this policy by the employees of the Bank may lead to disciplinary action being taken in accordance with Export-Import Bank Officers' (Conduct, Discipline and Appeal) Regulations, 2020.