

### **Corruption and Anti-Bribery Policy**

Cohesion Foundation Trust, and all its employees, agents and affiliates agrees that it will not bribe or attempt to bribe any government officials or employees, public international organisations, political parties or private individuals or entities. The organisation acknowledges and agrees that it is familiar with the anti-bribery laws in India (which may include laws promulgated under the Organisation for Economic Cooperation and Development's Convention on Combating Bribery of Foreign Public Officials (\*OECD Convention) and the UN Convention against corruption (\*UN Convention), and also with the U.S. Foreign Corrupt Practices Act (\*FCPA) or UK Bribery Act. Without in any way limiting the foregoing, organisation agrees that it shall not offer, give, promise to give or otherwise authorize the giving of money or anything of value to government officials or employees, public international organizations, political parties or private individuals or entities in violation of the Prevention of Corruption Act, 1988, FCPA, UK Bribery Act, OECD Convention, UN Convention. The organisation agrees that its books, records and accounts shall accurately reflect any and all payment by and transactions and organisation shall regularly audit the accounts of organisation.

The organisation agrees to bring allegations of corrupt, fraudulent, collusive, coercive or obstructive practices arising in relation to any employees or affiliates, promptly bring in attention of the CEO, Cohesion Foundation Trust. Definitions shall apply as:

- 1) "Corrupt Practice" - Means the offering, giving, receiving, or soliciting, directly or indirectly, of anything of value to influence improperly the actions of a public official;
- 2) "Fraudulent Practice" - Means any act or omission, including misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit, or to avoid an obligation.
- 3) "Coercive Practice" - Means impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party.
- 4) "Obstructive Practice" - Means acts intended to materially impede the exercise of Cohesion Foundation Trust's contractual rights of audit, investigation and access to information, including destruction, falsification, alteration or concealment of evidence material to Cohesion Foundation Trust investigation into allegations of fraud and corruption.