

BITMUTEX TECHNOLOGIES PRIVATE LIMITED

COLLUSION POLICY

Version - 1

Document Release History

Sl. No.	Version Number	Release Date	Prepared By	Reviewed & Approved By	Reasons for New Release
1	1	15.02.2023	Adarsh Sureka	Amit Kumar Nandi	Need of a model Collusion Policy

Introduction:

Collusion is a serious threat to the reputation and financial stability of any organization. It refers to any secret agreement or cooperation between two or more people or entities to gain an unfair advantage over others. Indus Net Technologies Private Limited (INT.) recognizes the potential harm caused by collusion and is committed to maintaining the highest standards of ethical conduct in all its business activities. This policy outlines the steps that BTPL will take to prevent, detect, and respond to any collusion that may occur within the organization.

Prevention:

To prevent collusion, BTPL will take the following measures:

Code of Conduct: All employees, contractors, and partners must abide by INT.'s Code of Conduct, which includes principles such as integrity, transparency, and honesty. This code will be communicated to all stakeholders and will be reviewed annually.

Anti-Corruption Policy: BTPL will have an Anti-Corruption Policy in place, which will prohibit employees from offering or accepting bribes, kickbacks, or any other form of payment that is intended to influence business decisions.

Conflicts of Interest: BTPL will require all employees to disclose any potential conflicts of interest that may arise in the course of their work. The company will also have a process for reviewing and managing conflicts of interest.

Training and Awareness: BTPL will provide regular training and awareness sessions to its employees, contractors, and partners on the risks of collusion and how to identify and report suspicious behaviour.

Detection:

To detect collusion, BTPL will take the following measures:

Internal Controls: BTPL will have robust internal controls in place, such as separation of duties, regular audits, and checks and balances, to ensure that no single individual has too much power or authority.

Monitoring: BTPL will monitor its systems and processes to identify any irregularities or suspicious behaviour that may indicate collusion. This will include the use of data analytics and other technology-based solutions.

Whistle-blower Policy: BTPL will have a Whistle-blower Policy in place that will encourage employees, contractors, and partners to report any suspected collusion or other misconduct. The policy will provide protection for whistle-blowers and will have a process for investigating and addressing any reports of misconduct.

Response:

To respond to collusion, BTPL will take the following measures:

Investigation: BTPL will investigate any reports of suspected collusion or other misconduct in a timely and thorough manner. The investigation will be conducted by an independent third party or an internal team that is not involved in the alleged misconduct.

Disciplinary Action: If collusion or other misconduct is confirmed, BTPL will take appropriate disciplinary action, which may include termination of employment or contracts, legal action, or referral to law enforcement authorities.

Remediation: BTPL will take steps to remediate any harm caused by collusion or other misconduct, including implementing changes to its systems, processes, and controls to prevent similar incidents from occurring in the future.

Conclusion:

Collusion is a serious threat to the integrity and reputation of any organization. BTPL is committed to preventing, detecting, and responding to collusion in all its business activities. This policy outlines the steps that BTPL will take to ensure that its employees, contractors, and partners abide by the highest standards of ethical conduct. By implementing these measures, BTPL can maintain the trust of its stakeholders and continue to grow and succeed in the marketplace.