

## Anti-Corruption & Bribery Policy

Global Institute for Circular Economy and Sustainable Development Goals (ICE&SDGs)

Version	1.0
Effective date	15 June 2026
Next review	15 June 2027
Policy owner	Ethics Officer / Compliance Lead, ICE&SDGs
Legal alignment	Prevention of Corruption Act, 1988 (as amended 2018); Bharatiya Nyaya Sanhita; FCPA/UK Bribery Act principles for international dealings
Contact	connect@ce-sdg.org

### 1. Purpose & Zero-Tolerance

ICE&SDGs has a zero-tolerance approach to corruption and bribery in any form. We are committed to acting professionally, fairly and with integrity in all our dealings. This policy explains what is prohibited and what everyone must do to keep ICE&SDGs free of corruption.

### 2. Scope

This policy applies to all employees, interns, volunteers, consultants, assessors, contractors, partners, vendors and anyone acting for or on behalf of ICE&SDGs, in India and internationally.

### 3. What is Prohibited

- **Bribery** — offering, giving, requesting or accepting any money, gift, favour or advantage to improperly influence a decision or action.
- **Kickbacks & secret commissions** — any undisclosed payment in return for awarding work, funding or favourable treatment.
- **Facilitation payments** — small unofficial payments to speed up routine actions are prohibited.
- **Abuse of position** — using one's role or ICE&SDGs' name for personal gain.

This applies whether the other party is a government official, client, donor, partner or private person, and whether done directly or through a third party.

### 4. Gifts & Hospitality

- Modest, occasional gifts or hospitality given openly as normal courtesy may be acceptable.
- Never give or accept gifts, hospitality or anything of value that is intended to, or could appear to, influence a decision.
- Cash or cash-equivalents must never be given or accepted as a gift.
- Gifts or hospitality above a modest value must be declined or declared to the Ethics Officer.

### 5. Dealing with Officials & Third Parties

- Exercise special care in any dealing with government or public officials.
- Conduct reasonable due diligence on partners, vendors and consultants; do not engage anyone known to use corrupt practices.

# ICE&SDGs

Global Institute for Circular Economy and Sustainable Development Goals  
Enabling Environmental Security for NextGen

---

- Contracts include the expectation of compliance with this policy.

## 6. Donations, Sponsorships & Political Activity

- Charitable donations and sponsorships must be genuine, transparent and properly recorded — never a disguised bribe.
- ICE&SDGs does not make political contributions to obtain advantage.

## 7. Record-Keeping

All payments, expenses, gifts and hospitality must be accurately recorded with supporting documents, in line with the Finance & Account Policy. No off-book or false records are permitted.

## 8. Reporting & Consequences

Anyone who suspects corruption or bribery must report it promptly to [connect@ce-sdg.org](mailto:connect@ce-sdg.org) or through the Whistle Blower Policy; good-faith reporters are protected from retaliation. Breach of this policy is serious misconduct and may lead to disciplinary action, termination, and referral to law-enforcement authorities.

## 9. Review

This policy is reviewed at least annually.

---

*Approved by the Governing Council / Management of ICE&SDGs. For questions or to raise a concern under this policy, contact [connect@ce-sdg.org](mailto:connect@ce-sdg.org).*