

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Name of Document	Anti-Bribery and Anti-Corruption Policy
Version	2.0
Policy/Code/ Manual/ Guideline	Policy
Organization	KONERU LAKSHMAIAH EDUCATION FOUNDATION (Deemed to be University)
Issuing Authority	REGISTRAR KONERU LAKSHMAIAH EDUCATION FOUNDATION (Deemed to be University) Green Fields, Vaddeswaram – 522302 Guntur District, Andhra Pradesh, INDIA
Effective date of document	1 July 2020

Introduction

Koneru Lakshmaiah Education Foundation (KLEF) is committed to serving society with the highest level of integrity and in full compliance with all applicable anti-bribery and anti-corruption laws and regulations. This policy outlines KLEF's zero-tolerance approach to bribery and corruption and establishes clear guidelines for all employees and stakeholders.

Policy Statement

KLEF strictly prohibits all forms of bribery and corrupt practices involving students, staff, or any stakeholder. The institution will not tolerate any actions that compromise the integrity of its academic and research activities or undermine the trust of students, partners, regulatory bodies, and the public.

Purpose

The purpose of this policy is to:

1. Define the responsibilities of employees and all individuals working for or on behalf of KLEF in observing and upholding the institution's stance against bribery and corruption.
2. Provide information and guidance to employees, suppliers, partners, and other third parties associated with KLEF on how to identify, prevent, and address bribery and corruption.

Scope

This policy applies to all employees, directors, contractors, suppliers, consultants, agents, and any other individuals or entities representing KLEF (hereinafter referred to as "Representatives").

Definition of Bribery and Corruption

Bribery refers to the offering, promising, giving, accepting, or soliciting of any undue advantage—directly or indirectly—to influence a decision or secure an improper benefit.

Corruption encompasses a broader range of dishonest and unethical conduct, including extortion, embezzlement, fraud, money laundering, and other unlawful activities.

Forms of Bribery that Pose the Greatest Risk

Bribery and corrupt practices may occur in various forms. However, the following areas present the greatest risk:

Gifts and Hospitality

Employees should carefully assess the intent behind any gift or hospitality offered or received. Gifts or hospitality intended to improperly influence decision-making or create a sense of obligation must not be offered or accepted. KLEF prohibits the offering or acceptance of gifts or hospitality that are excessive, inappropriate, or not bona fide.

Prohibited Activities

The following activities are strictly prohibited:

- Offering, giving, promising, or accepting bribes or facilitation payments from any individual or organization, whether public or private.
- Providing or receiving inappropriate gifts, hospitality, or entertainment intended to obtain or retain business or preferential treatment.
- Entering into transactions or relationships with third parties is known to be involved in corrupt practices.
- Misusing or diverting institutional funds or assets for unlawful or unethical purposes.
- Providing false or misleading information or engaging in corrupt practices during audits, inspections, or regulatory interactions.
- Threatening or retaliating against employees who refuse to participate in bribery or who report concerns under this policy.
- Engaging in any activity that could lead to a breach of this policy.

Reporting Mechanism

KLEF encourages all stakeholders to promptly report any suspected or actual incidents of bribery or corruption. A confidential reporting mechanism, such as the **KLEF**

Whistleblower Hotline or an anonymous reporting system will be made available to protect the identity of whistleblowers.

Whistleblower Protection

KLEF is committed to protecting individuals who report concerns or violations of this policy in good faith. Retaliation against whistleblowers will not be tolerated, and appropriate measures will be taken to safeguard their rights and confidentiality.

Training and Awareness

KLEF will regularly create awareness among stakeholders regarding this policy and relevant anti-bribery and anti-corruption laws. The institution follows the guidelines and processes prescribed by the Central Vigilance Commission (CVC) and participates in **Vigilance Awareness Week (VAW)** annually. Training and awareness initiatives will be tailored to the specific roles and responsibilities of individuals within the institution.

Due Diligence

KLEF will conduct appropriate due diligence on third parties, including suppliers, agents, consultants, and business partners—to assess their integrity and ensure compliance with applicable anti-bribery and anti-corruption laws.

Record Keeping

KLEF will maintain accurate, transparent, and complete records of all business transactions. Documentation related to gifts, hospitality, and entertainment will be retained for the required period in accordance with institutional policies and applicable regulations.

Responsibility for Compliance

The **Board of Management of KLEF** has overall responsibility for ensuring that this policy complies with legal and ethical standards and that all individuals under its control adhere to it.

The **University Administration** is responsible for implementing this policy, monitoring its effectiveness, and addressing queries related to its interpretation. Every individual to whom this policy applies is responsible for supporting its successful implementation and for reporting any suspected misconduct or violation.

All employees are required to provide an **annual certification of compliance** with this policy in the prescribed format, including the pledge and declaration as stipulated by the Central Vigilance Commission (CVC).

Review and Amendments

This policy will be reviewed periodically to ensure its continued effectiveness and alignment with evolving laws, regulations, and institutional practices. Any amendments will be communicated to all stakeholders in a timely manner.

Consequences of Non-Compliance

Failure to comply with this policy may result in disciplinary action, including termination of employment or contractual engagement. Violations may also lead to civil or criminal proceedings in accordance with applicable laws.

@




(Dr.R.R.L. Kantam)
Registrar
REGISTRAR
Koneru Lakshmaiah Education Foundation
(Deemed to be University)
Green Fields, VADDESWARAM-522 502.
Guntur District, Andhra Pradesh.