



Fusion CX Limited
Anti-Bribery, Anti-Corruption, Anti-Trust, And Fair
Competition Policy

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1 Purpose

1.1 Objective

This policy articulates FUSION CX Limited's unwavering commitment to conducting business with the highest standards of ethics, transparency, and integrity. It serves as a guiding framework to prevent, detect, and address any form of bribery, corruption, anti-trust violations, and unfair competition in all operations globally. By establishing this policy, FUSION CX seeks to safeguard its reputation and maintain compliance with international laws, including the Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and local anti-corruption legislation.

1.2 Alignment with Core Principles

The policy aligns with FUSION CX's core principles of corporate governance and ethical conduct, ensuring that the company operates in full compliance with applicable laws and regulations. It reflects the company's zero-tolerance approach to bribery and corruption, fostering a culture of accountability and ethical decision-making.

1.3 Key Commitments

FUSION CX asserts its dedication to:

- Prohibiting bribery, facilitation payments, and kickbacks in all forms.
- Ensuring fair competition practices and adherence to anti-trust laws.
- Upholding accurate and transparent financial records to detect and deter unethical conduct.
- Providing guidance to employees and stakeholders on recognizing, reporting, and mitigating risks related to bribery and corruption.

2 Scope and Applicability

2.1 Applicability

This policy applies to all individuals associated with FUSION CX Limited, including but not limited to:



- Directors, officers, and employees at all levels.
- Consultants, contractors, and trainees.
- Agents, representatives, and intermediaries.
- Subsidiaries, associates, joint ventures, and other entities acting on behalf of FUSION CX.

The policy governs all activities, including interactions with government officials, private entities, and any other external stakeholders, regardless of the nature, scale, or geographic location of the transaction.

2.2 Geographical Scope

The provisions of this policy are binding across all jurisdictions where FUSION CX operates. In instances where local anti-bribery and anti-corruption laws are stricter than this policy, such local laws will take precedence. However, where local laws are less stringent, the standards set forth in this policy shall apply as a minimum requirement.

2.3 Business Practices

This policy encompasses all business dealings, including but not limited to:

- Procurement, contracts, and supply chain activities.
- Sales and marketing initiatives.
- Financial transactions and record-keeping.
- Partnerships, joint ventures, and third-party collaborations.

2.4 Responsibility of Stakeholders

All individuals covered under this policy are required to:

- Familiarize themselves with its contents.
- Ensure compliance with the principles and procedures outlined herein.
- Report any suspected violations to the appropriate authority within FUSION CX.



3 Policy Statement

3.1 Zero-Tolerance Stance

FUSION CX Limited adopts a zero-tolerance approach to bribery, corruption, anti-trust violations, and unfair competition in any form. The company prohibits any individual or entity associated with its operations from engaging in activities that could compromise ethical standards or contravene applicable laws.

3.2 Prohibition of Bribery and Corruption

FUSION CX strictly forbids:

- Offering, promising, giving, or authorizing bribes or any other undue advantages to influence decisions or gain improper benefits.
- Soliciting or accepting bribes or other improper inducements in the course of performing duties for the company.
- Facilitation payments or “grease payments” intended to expedite routine governmental actions.

3.3 Commitment to Fair Competition

FUSION CX is committed to competing fairly and transparently in the marketplace. The company prohibits all anti-competitive practices, including but not limited to:

- Price fixing, bid rigging, or market allocation with competitors.
- Misuse of market power to restrict competition.
- Sharing sensitive business information with competitors inappropriately.

3.4 Accurate Record-Keeping

The company ensures:

- Maintenance of detailed and accurate records of all transactions and expenditures to identify and deter unethical practices.
- No falsification, misrepresentation, or omission of financial data in corporate records.



3.5 Applicability to All Stakeholders

This policy applies to all directors, employees, contractors, and third parties engaged with FUSION CX, irrespective of the geographic location or scale of operations.

3.6 Consequences of Non-Compliance

Violations of this policy will result in severe consequences, including disciplinary action, termination of contracts or employment, and reporting to relevant authorities for potential legal action.

3.7 Commitment to Ethical Conduct

FUSION CX will:

- Foster a culture of accountability and integrity.
- Provide regular training and guidance to employees and associates to ensure compliance with this policy.
- Continuously improve anti-bribery and anti-corruption measures based on global best practices.

4 Definitions

To ensure clarity and uniform understanding, the following key terms are defined for the purpose of this policy:

4.1 Bribery

The act of offering, giving, receiving, or soliciting something of value to influence the actions or decisions of an individual in a position of trust or authority. Bribery includes but is not limited to:

- Monetary payments.
- Offering gifts, hospitality, or entertainment.
- Providing favors or preferential treatment.
- Promises of employment or other personal benefits.



4.2 Corruption

Dishonest or fraudulent conduct by those in power or authority for personal gain, including acts such as embezzlement, misappropriation of resources, and abuse of authority.

4.3 Facilitation Payments

Small, unofficial payments made to expedite or secure routine governmental actions (e.g., processing permits, providing public services). These payments are strictly prohibited under this policy.

4.4 Kickbacks

Payments made in return for a business favor or advantage, typically in secret and as part of corrupt practices. These include commissions or incentives that are not legally or contractually justified.

4.5 Anti-Trust Practices

Actions that undermine fair competition in the marketplace, including:

- Price fixing.
- Market allocation.
- Bid rigging.
- Creation of monopolies or cartels.

4.6 Fair Competition

Business practices that promote healthy competition without engaging in deceptive, dishonest, or unethical behavior.

4.7 Conflict of Interest

A situation where personal interests or relationships of an individual could improperly influence their professional duties or decisions made on behalf of the company.



4.8 Public Official

Includes individuals holding legislative, executive, or administrative positions in government (domestic or foreign) or working for government-owned or controlled organizations. This term also encompasses individuals performing public duties for public agencies or enterprises.

4.9 Third-Party

Any individual or entity that interacts with FUSION CX on its behalf, including but not limited to:

- Agents, consultants, contractors, suppliers, distributors, and joint venture partners.

4.10 Undue Advantage

Any benefit, monetary or otherwise that is not legally or contractually due, offered, or received to influence a decision or secure an improper benefit.

5 General Principles

5.1 Commitment to Ethical Standards

FUSION CX Limited is dedicated to conducting all business operations with integrity, transparency, and compliance with global anti-bribery and anti-corruption laws. These principles guide every action and decision within the company to prevent, detect, and address unethical practices.

5.2 Risk Assessment

FUSION CX employs a risk-based approach to identify and mitigate potential bribery and corruption risks in its operations. The risk assessment process includes:

- Evaluating external factors such as industry norms, geographic regions, and regulatory landscapes.
- Reviewing internal factors such as business processes, policies, and training programs.
- Conducting periodic risk assessments, especially in response to significant changes in the business environment or applicable laws.



5.3 Gifts, Hospitality, and Entertainment

The company permits gifts, hospitality, and entertainment only when they:

- Are modest, reasonable, and customary in nature.
- Are given transparently and without intent to influence a decision.
- Comply with FUSION CX's internal policies and the applicable laws of the jurisdiction.

Prohibited practices include:

- Offering or accepting cash or cash equivalents.
- Providing lavish or excessive gifts, hospitality, or entertainment.
- Giving or accepting gifts or benefits in exchange for preferential treatment or business advantage.

5.4 Donations

The Company may make donations but only if they are ethical, permitted in applicable regulation(s) this policy. No donation should be made which can be perceived as the breach of this policy statement and/or not permitted under applicable regulation(s). All donations must be approved by the Company's Audit Committee and the Company shall keep accurate records of all donations made by the Company. Company may disclose such donations in its annual report

5.5 Facilitation Payments and Kickbacks

FUSION CX strictly prohibits:

- Making facilitation payments to expedite routine actions by public officials.
- Offering or accepting kickbacks in any form to secure business advantages.

5.6 Interactions with Public Officials

Employees and representatives of FUSION CX must exercise caution when dealing with public officials to ensure:

- Full compliance with local laws and international anti-bribery regulations.



- Transparency and proper documentation of all interactions.

5.7 Third-Party Engagements

FUSION CX holds third parties, including agents, consultants, contractors, and vendors, to the same ethical standards outlined in this policy. Third-party engagements must adhere to the following:

- Conducting due diligence before onboarding to assess their integrity and compliance with anti-corruption laws.
- Including anti-bribery and anti-corruption clauses in contracts.
- Monitoring third-party activities and relationships periodically.

5.8 Record Keeping and Internal Controls

FUSION CX ensures accurate and transparent record-keeping to:

- Maintain a clear audit trail of all financial transactions.
- Prevent fraudulent activities or misrepresentation in company accounts.
- Support compliance with legal and regulatory requirements.

5.9 Continuous Improvement

Fusion CX regularly evaluates its anti-bribery and anti-corruption measures to enhance their effectiveness. This includes updating policies, training programs, and monitoring mechanisms to align with evolving legal and industry standards.

6 Responsibilities

6.1 Board of Directors and Audit Committee

The Board of Directors and the Audit Committee are entrusted with overseeing the implementation, governance, and compliance of this policy. Their key responsibilities include:

- Ensuring the suitability, adequacy, and effectiveness of this policy.
- Reviewing reports on compliance, risk assessments, and investigations of potential breaches.



- Providing strategic guidance for improvements to the company's anti-bribery and anti-corruption framework.

6.2 Compliance Officer

FUSION CX shall designate a Compliance Officer responsible for monitoring adherence to this policy. The Compliance Officer's responsibilities include:

- Acting as the point of contact for all concerns and queries regarding bribery and corruption.
- Ensuring appropriate and ongoing training programs for all employees and stakeholders.
- Investigating reported concerns and recommending corrective actions, including disciplinary measures where necessary.
- Reporting significant breaches or concerns to the Board or Audit Committee.

6.3 Managers and Supervisors

Managers and supervisors are responsible for promoting a culture of compliance and integrity within their teams. Their duties include:

- Familiarizing their teams with the policy and ensuring adherence.
- Identifying and mitigating bribery and corruption risks in their respective areas of responsibility.
- Reporting any suspected violations or red flag indicators to the Compliance Officer.

6.4 Employees and Representatives

Every employee and representative of FUSION CX is expected to:

- Read, understand, and comply with this policy and related procedures.
- Avoid any actions or omissions that could lead to a breach of this policy.
- Report any suspected or actual breaches promptly through designated channels.
- Cooperate fully with investigations and audits related to potential violations of this policy.



6.5 Third Parties

Third parties engaged by FUSION CX, including agents, vendors, contractors, and consultants, are expected to:

- Adhere to the anti-bribery and anti-corruption principles outlined in this policy.
- Sign agreements that include anti-bribery clauses and commit to compliance with relevant laws.
- Undergo due diligence and periodic monitoring by FUSION CX to ensure continued compliance.

6.6 Accountability and Consequences

All stakeholders covered under this policy are accountable for their actions. Non-compliance with this policy will result in:

- Disciplinary actions for employees, including termination of employment.
- Contractual and legal actions against third parties, including termination of engagements.
- Notification to relevant authorities for potential criminal or civil proceedings.

7 Communication and Training

7.1 Regular Training Programs

FUSION CX is committed to ensuring that all employees and representatives understand their responsibilities under this policy. To achieve this:

- **Mandatory Training:** All employees, including senior management, will be educated on anti-bribery and anti-corruption laws, risks, and reporting mechanisms through regular, mandatory training sessions.
- **Specialized Training:** To address unique challenges they may encounter, additional, role-specific training will be provided for employees in high-risk roles or regions.



7.2 Induction for New Employees

All new employees will undergo comprehensive orientation programs that include detailed training on this policy. This ensures they understand FUSION CX's ethical standards and compliance requirements from the outset of their employment.

7.3 Third-Party Awareness

Third parties, including contractors, agents, and consultants, will be informed of FUSION CX's anti-bribery and anti-corruption standards. Where deemed necessary, training may be extended to third parties whose roles involve significant compliance risks.

7.4 Accessibility of Policy and Reporting Mechanisms

- The policy and associated guidelines will be made easily accessible through internal platforms, such as the company intranet or shared resources.
- Reporting channels, including whistleblower mechanisms, will be prominently communicated to all employees and third parties to encourage timely reporting of concerns.

7.5 Awareness Materials

The company will disseminate awareness materials, such as:

- Posters and brochures detailing prohibited behaviors and reporting channels.
- FAQs to address common questions about compliance with this policy.
- Case studies and examples illustrating appropriate and inappropriate actions.

7.6 Measuring Effectiveness

The Compliance Officer will periodically assess the effectiveness of training programs by:

- Gathering feedback from participants to identify areas for improvement.
- Monitoring compliance metrics, including the number of reported concerns and resolved cases.
- Updating training content to reflect changes in laws or emerging risks.



7.7 Continuous Reinforcement

To maintain awareness and reinforce compliance, the company will:

- Issue regular updates and reminders about the policy through emails, newsletters, and team meetings.
- Incorporate ethical discussions into routine managerial and team interactions.

8 When Compelled for Bribe or Facilitation Payment

8.1 Policy Stance

FUSION CX Limited maintains a strict prohibition against bribery and facilitation payments. However, the company recognizes that exceptional circumstances may arise where the health, safety, or security of an employee or third party is at risk due to a demand for a bribe or facilitation payment.

8.2 Exceptional Circumstances

In situations where an employee or representative faces immediate threats to personal safety or well-being, the following principles shall apply:

- A bribe or facilitation payment may be made only if it is absolutely necessary to mitigate the risk of harm.
- Such payments must be minimal and strictly limited to addressing the immediate threat.

8.3 Reporting Requirements

Any payment made under these exceptional circumstances must be reported to the Compliance Officer within 24 hours, or as soon as reasonably possible.

The report must include:

- Details of the incident, including date, time, and location.
- The amount and purpose of the payment.
- Parties involved, including the identity of the official or individual demanding the payment.



8.4 Documentation and Review

All reported incidents will be documented in detail and subject to review by the Compliance Officer.

A formal report will be prepared, outlining the circumstances, the action taken, and any corrective measures needed to prevent recurrence.

8.5 Legal Reporting

If required by law, the Compliance Officer, in consultation with the Legal Department, will report the matter to the appropriate authorities within 7 days of the payment.

The company will cooperate fully with law enforcement or regulatory agencies in investigating the incident.

8.6 Proactive Measures

To minimize the risk of employees being compelled to make such payments:

- Employees will receive training on recognizing and handling high-risk situations.
- Guidance will be provided on de-escalation tactics and alternative methods to address demands for bribes.
- The company will establish contingency plans for employees operating in high-risk regions.

9 Reporting of Concerns and Investigations

9.1 Encouragement of Reporting

FUSION CX Limited encourages all employees, contractors, and third parties to promptly report any suspected or actual breaches of this policy. The company is committed to providing a safe and confidential environment for reporting such concerns.

9.2 Reporting Channels

Reports can be made through the following channels:

- Direct Reporting: Concerns can be reported to immediate supervisors, managers, or the Compliance Officer.



- **Whistleblower Hotline:** An anonymous and confidential hotline is available for reporting concerns without fear of reprisal.
- **Email Communication:** Employees can submit reports directly to the Compliance Department via a designated email address.
- **Online Reporting:** A secure online platform is available for submitting reports discreetly.

9.2 Investigative Process Upon receiving a report, the following steps will be undertaken:

1. **Preliminary Assessment:** The Compliance Officer will review the report to determine its validity and assess the need for further investigation.
2. **Formal Investigation:** If necessary, a formal investigation will be conducted by an impartial team that may include internal auditors, legal advisors, or external experts.
3. **Evidence Collection:** All relevant evidence, including documents, communications, and witness statements, will be gathered and securely stored.
4. **Confidentiality:** The identity of the whistleblower and all investigation details will be kept confidential, disclosed only on a need-to-know basis.

9.4 Protection of Whistleblowers

- **Non-Retaliation:** FUSION CX strictly prohibits retaliation against individuals who report concerns in good faith. Any acts of retaliation will be treated as a serious violation of company policy.
- **Support Mechanisms:** Whistleblowers will have access to support services, including counseling and, if necessary, legal assistance.

9.5 Outcome and Corrective Actions

- Upon completion of the investigation, a formal report will be prepared, detailing findings and recommended actions.
- Corrective measures may include:
 - Disciplinary action against offenders.
 - Process improvements to prevent recurrence.
 - Notification to law enforcement or regulatory authorities, if warranted.



9.6 Feedback to Reporter

Where possible, the Compliance Officer will provide feedback to the reporting individual, informing them of the investigation's outcome while maintaining confidentiality.

9.7 Record Keeping

All reports, investigations, and outcomes will be documented and securely stored for a minimum period as prescribed by the company's record retention policy.

10 Penalties

10.1 Seriousness of Violations

FUSION CX Limited considers any breach of this Anti-Bribery, Anti-Corruption, Anti-Trust, and Fair Competition Policy to be a grave matter. Violations undermine the company's ethical standards and expose the organization and its personnel to significant legal and reputational risks.

10.2 Disciplinary Actions

Employees or representatives found to have violated this policy may face disciplinary measures, including but not limited to:

- Verbal or written warnings.
- Suspension from duties.
- Termination of employment or contract.

The specific penalty will depend on the nature and severity of the violation, as well as any mitigating or aggravating circumstances.

10.3 Third-Party Penalties

Third parties, including contractors, agents, and vendors, who breach this policy may face:

- Termination of their contract or business relationship with FUSION CX.
- Legal proceedings for damages or other remedies available under the terms of the agreement.



10.5 Legal Consequences

Violations of anti-bribery and anti-corruption laws may result in:

- Civil or criminal liabilities for both individuals and the company.
- Monetary fines, imprisonment, or other penalties as prescribed under applicable laws such as the Foreign Corrupt Practices Act (FCPA) and UK Bribery Act.
- Regulatory sanctions, including disqualification from public tenders or blacklisting.

10.6 Escalation to Authorities

FUSION CX reserves the right to report serious violations to the appropriate law enforcement or regulatory authorities, particularly when the breach involves criminal activities such as bribery or fraud.

10.7 Reputational Impact

Violations can have far-reaching consequences on the company's reputation. Therefore, FUSION CX will take all necessary steps to mitigate reputational damage, including:

- Public disclosures, where required, to demonstrate accountability.
- Implementation of enhanced controls and processes to prevent recurrence.

10.8 Prevention of Future Violations

In cases of policy breaches, FUSION CX will review the root causes and implement corrective actions, such as:

- Strengthening internal controls.
- Revising the policy to address emerging risks.
- Conducting additional training and awareness sessions.

11 Amendment Of Policy

11.1 Right to Amend

FUSION CX Limited reserves the right to amend, modify, or update this Anti-Bribery, Anti-Corruption, Anti-Trust, and Fair Competition Policy at its sole discretion to reflect changes in:



- Applicable laws and regulations.
- Industry best practices and global standards.
- Organizational structure, operations, or strategic priorities.

11.2 Approval Process

All amendments to this policy will be reviewed and approved by the Compliance Officer and the Board of Directors to ensure alignment with the company's ethical principles and compliance framework.

11.3 Communication of Amendments

Revised versions of this policy will be:

- Communicated to all employees, contractors, and third parties through official company channels, including emails, training sessions, and the corporate intranet.
- Made accessible to all stakeholders to ensure awareness and understanding of the changes.

11.4 Effective Date of Amendments

Amendments to this policy will take effect on the date specified in the revised document or as communicated by the Compliance Officer. Stakeholders are required to familiarize themselves with the updated policy and adhere to the revised provisions.

11.5 Periodic Review

This policy will be reviewed periodically, at least once every two years, or earlier if necessitated by:

- Significant changes in legal or regulatory requirements.
- Identification of gaps or risks during audits or investigations.
- Evolving industry practices or company operations.

12 Relevant Regulations

Overview of Key Anti-Bribery and Anti-Corruption Laws



This annexure highlights the key laws and regulations that govern FUSION CX Limited's operations and form the foundation for this policy. Compliance with these laws is mandatory across all jurisdictions where FUSION CX operates.

Regulation	Jurisdiction	Purpose	Key Provisions	Penalties
Foreign Corrupt Practices Act (FCPA)	United States	Prohibits bribery of foreign officials to obtain or retain business.	<ul style="list-style-type: none"> Prohibits bribery (direct/indirect). Requires accurate record-keeping. Mandates internal accounting controls. 	Civil and criminal penalties, including fines and imprisonment for individuals and entities.
UK Bribery Act (UKBA)	United Kingdom	Addresses active and passive bribery in commercial organizations.	<ul style="list-style-type: none"> Prohibits offering, giving, or accepting bribes. Introduces corporate liability for failure to prevent bribery. Covers bribery of foreign public officials. 	Fines for entities and imprisonment for individuals; extraterritorial application.
Prevention of Corruption Act (Amended)	India	Prevents corruption in government and public sectors.	<ul style="list-style-type: none"> Criminalizes acceptance of undue advantages by public officials. Criminalizes offering bribes to public officials. Includes penalties for commercial organizations involved in bribery. 	Imprisonment (3–7 years) and fines for individuals and entities.
Local Anti-Bribery Laws	All Jurisdictions	Ensures compliance with stricter local anti-corruption laws.	<ul style="list-style-type: none"> Stricter requirements in some jurisdictions take precedence over global policies. 	Varies by jurisdiction; typically includes fines, imprisonment, and business restrictions.
United Nations Convention against Corruption (UNCAC)	Global	Promotes international cooperation in combating corruption.	<ul style="list-style-type: none"> Sets international anti-corruption standards. Encourages enforcement across borders. 	No direct penalties; serves as a guideline for member nations.
OECD Anti-Bribery Convention	Global	Addresses bribery of foreign public officials in international business.	<ul style="list-style-type: none"> Criminalizes bribery of foreign officials by companies operating in member states. 	No direct penalties: enforcement is at the national level by member states.

			<ul style="list-style-type: none"> Encourages enforcement mechanisms. 	
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13 Red Flag Indicators

Red Flag	Description
Unusual Payment Patterns	<ul style="list-style-type: none"> Requests for payments in offshore accounts or in multiple installments that deviate from normal practices.
High Commissions or Fees	<ul style="list-style-type: none"> Demands for unusually high commissions, fees, or discounts compared to market standards.
Lack of Transparency	<ul style="list-style-type: none"> Third parties refusing to provide details about ownership, financial records, or previous business dealings.
Close Connections with Government Officials	<ul style="list-style-type: none"> A third party's principal or owner is a government official or has close ties to officials in jurisdictions of operation.
Guarantees of Success	<ul style="list-style-type: none"> Promises by a third party of guaranteed outcomes, such as obtaining licenses or contracts, without explaining legitimate means to achieve them.
Reluctance to Accept Compliance Clauses	<ul style="list-style-type: none"> Resistance from a third party to include anti-bribery clauses, audit rights, or termination rights in contracts.
Reputation for Questionable Practices	<ul style="list-style-type: none"> Reports or due diligence revealing prior involvement in unethical practices, bribery, or corruption.
Unusual Payment Structures	<ul style="list-style-type: none"> Requests for payments in cash, through third parties, or via untraceable financial arrangements.
Pressure to Work Without Written Agreements	<ul style="list-style-type: none"> Requests to proceed with transactions without formal contracts or agreements.
Involvement of Public Officials in Transactions	<ul style="list-style-type: none"> A public official insists on the engagement of a specific third party or individual.
Evasive Behavior	<ul style="list-style-type: none"> Third parties avoiding due diligence processes or withholding critical information about their operations.
High-Risk Geographies	<ul style="list-style-type: none"> Business dealings in regions or countries with a known high incidence of corruption and bribery.
Inflated Invoices	<ul style="list-style-type: none"> Submission of invoices that appear excessive or disproportionate to the services rendered.
Exclusive Dealings Without Justification	<ul style="list-style-type: none"> Third parties requesting exclusivity in dealings without providing a clear and legitimate business rationale.



Refusal to Allow Access to Books and Records	<ul style="list-style-type: none">• Denial of access to financial records or operational data during audits or due diligence processes.
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Date: 11th April, 2025

Place: Kolkata