BUSINESS ETHICS & ANTI-BRIBERY POLICY

Shatabdi NetBiz (SNBiz)

Policy Reference: SNBiz-POL-BEAB-001
Version: 1.0
Effective Date: Upon Management Approval
Policy Owner: Chief Executive Officer
Review Frequency: Annually
Applicability: All Employees, Management, Trainers, Assessors, Contractors, Suppliers, Consultants, and Business Representatives

1. Policy Statement

Shatabdi NetBiz (SNBiz) is committed to conducting all business activities with honesty, integrity, transparency, fairness, and accountability.

We believe that ethical business conduct is fundamental to building trust, maintaining professional credibility, protecting stakeholder interests, and achieving sustainable organizational growth.

SNBiz adopts a **zero-tolerance approach to bribery, corruption, fraud, dishonest practices, and unethical influence** in its business operations and professional relationships.

No employee, trainer, assessor, representative, or business partner acting on behalf of SNBiz shall offer, promise, give, request, accept, or authorize any improper payment, benefit, favor, or advantage intended to influence a business decision or obtain an unfair advantage.

Our Ethical Commitment:

Integrity in Every Decision. Transparency in Every Transaction. Accountability in Every Action.

2. Policy Objectives

This policy aims to:

1. Promote ethical, lawful, and responsible business conduct.
2. Prevent bribery, corruption, fraud, and improper influence.
3. Ensure transparency and fairness in procurement, contracting, and financial transactions.
4. Protect the integrity and impartiality of training, assessment, and certification activities.
5. Identify, disclose, and appropriately manage conflicts of interest.
6. Establish clear standards for gifts, hospitality, sponsorships, and business relationships.
7. Encourage confidential reporting of suspected misconduct without retaliation.
8. Promote accountability, appropriate investigation, and corrective action.
9. Strengthen stakeholder confidence and organizational reputation.
10. Support continual improvement in ethical governance and anti-bribery controls.

3. Scope & Applicability

This policy applies to all activities conducted by or on behalf of SNBiz, including:

- Corporate management and administrative operations.
- Training and professional development services.
- Competency assessment and certification processes.
- Procurement, sourcing, and general supply activities.
- Outsourcing and third-party service arrangements.
- Client engagement, business development, and contract negotiations.
- Recruitment, employment, and personnel management.
- Financial transactions and business partnerships.
- Interactions with public officials, regulatory bodies, and other stakeholders.

All individuals representing SNBiz are expected to uphold the principles of this policy.

4. Ethical Business Conduct

SNBiz expects all personnel and representatives to:

- Act honestly, professionally, and in good faith.
- Comply with applicable laws, contractual requirements, and organizational policies.
- Maintain accurate and truthful business records.
- Treat clients, participants, employees, suppliers, and other stakeholders fairly.
- Avoid misleading statements, misrepresentation, and deceptive practices.
- Protect confidential information and organizational assets.
- Make business decisions based on legitimate professional and commercial considerations.
- Respect human dignity, diversity, and equal opportunity.
- Report suspected unethical conduct through appropriate channels.

Business objectives shall never justify unlawful or unethical conduct.

5. Anti-Bribery & Anti-Corruption Commitment

SNBiz strictly prohibits bribery and corruption in any form, whether direct or indirect.

Prohibited activities include:

- Offering money, gifts, commissions, or other benefits to improperly influence decisions.
- Accepting personal benefits in exchange for awarding contracts or providing preferential treatment.
- Making unauthorized or improper payments to public officials.
- Offering or accepting kickbacks or undisclosed commissions.
- Using intermediaries to facilitate prohibited payments.
- Requesting payments or favors in exchange for favorable training or assessment outcomes.
- Providing benefits intended to improperly influence procurement, recruitment, or certification decisions.

This prohibition applies regardless of the monetary value of the benefit or whether the intended improper advantage is ultimately obtained.

6. Facilitation Payments

SNBiz prohibits facilitation payments intended to improperly accelerate or secure routine administrative or governmental actions.

Employees and representatives shall not make such payments, even where they are described as customary business practices.

Where a payment is demanded under an immediate and credible threat to personal safety, the individual should prioritize safety and report the circumstances to management as soon as reasonably possible.

Any such incident must be accurately documented and reviewed.

7. Gifts, Hospitality & Entertainment

SNBiz recognizes that modest and legitimate business hospitality may be appropriate in certain professional relationships.

However, gifts, hospitality, meals, travel, or entertainment must never be used to improperly influence business decisions.

Any permitted gift or hospitality must:

- Have a legitimate business purpose.
- Be reasonable, proportionate, and appropriate.
- Comply with applicable laws and client requirements.
- Not create an actual or perceived obligation.
- Not be offered during sensitive procurement, tender, assessment, or contract approval decisions where it could compromise impartiality.
- Be disclosed and approved where required by organizational procedures.

Cash gifts, cash equivalents, undisclosed personal commissions, and benefits intended to secure improper advantages are prohibited.

Management shall establish appropriate approval thresholds and recordkeeping requirements.

8. Conflict of Interest

A conflict of interest may arise when personal, financial, family, or other relationships could influence, or appear to influence, an individual's professional judgment.

Examples include:

- Participating in procurement decisions involving a family member's business.
- Assessing a trainee where a personal relationship could compromise impartiality.
- Receiving personal financial benefits from a supplier or client.
- Using organizational information for private commercial gain.
- Participating in recruitment decisions involving undisclosed personal interests.

All actual, potential, or perceived conflicts of interest must be promptly disclosed to management.

SNBiz shall assess reported conflicts and implement appropriate measures, which may include independent review, reassignment, or exclusion from the relevant decision.

9. Integrity in Training, Assessment & Certification

As a professional training and competency assessment organization, SNBiz places particular importance on the credibility of its learning outcomes, assessment decisions, and certification processes.

We are committed to ensuring that:

- Training records accurately reflect actual participation and delivery.
- Competency assessments are conducted fairly and objectively.
- Assessment results are based on demonstrated performance and established criteria.
- Certificates are issued only when the applicable requirements have been fulfilled.
- No trainer, assessor, or representative accepts payments or favors to alter results.
- Attendance records, assessment documents, and certification information are not falsified.
- Assessment conflicts of interest are disclosed and managed.
- Certification records are appropriately maintained and verifiable.

No commercial pressure, personal relationship, or financial incentive shall compromise the integrity of an assessment or certification decision.

10. Fair Procurement & Supplier Relationships

SNBiz is committed to transparent, competitive, and ethical procurement practices.

Procurement and supplier selection decisions shall be based on relevant factors such as:

- Quality and technical suitability.
- Safety and regulatory compliance.
- Cost and overall value.
- Reliability and delivery capability.
- Professional competence.
- Ethical conduct and business reputation.

Employees and representatives must not solicit or accept undisclosed benefits from suppliers or contractors.

Where appropriate, suppliers and business partners shall be informed of SNBiz's ethical expectations.

11. Third-Party Due Diligence

SNBiz recognizes that bribery and unethical conduct may occur through agents, consultants, intermediaries, contractors, or other third parties.

Risk-based checks shall be undertaken where appropriate before establishing significant business relationships.

Such checks may consider:

- Business registration and legitimacy.
- Relevant qualifications and capabilities.
- Reputation and past conduct.
- Potential conflicts of interest.

- Unusual payment requests or commission arrangements.
- Relationships with public officials or decision-makers.
- Compliance with applicable legal and contractual requirements.

Third-party arrangements shall not be used to bypass the requirements of this policy.

12. Financial Integrity & Recordkeeping

SNBiz shall maintain accurate and sufficiently detailed records of business transactions.

All payments, expenses, reimbursements, commissions, and other financial activities must have a legitimate business purpose and appropriate supporting documentation.

The following practices are prohibited:

- False or misleading invoices.
- Fictitious expenses or unsupported reimbursements.
- Undisclosed or unauthorized payments.
- Deliberate misclassification of transactions.
- Falsification of accounting records.
- Use of organizational funds for improper personal benefits.

Financial records shall be maintained in accordance with applicable legal and organizational requirements.

13. Political Contributions, Donations & Sponsorships

SNBiz shall not make political contributions or provide financial or non-financial support for the purpose of obtaining improper business advantages.

Charitable donations, community contributions, and sponsorships must have legitimate purposes and shall not be used to disguise bribery or influence business decisions.

Such activities shall be subject to appropriate management approval, documentation, and review.

14. Confidentiality, Data Protection & Fair Competition

SNBiz shall protect confidential business, client, employee, trainee, and assessment information.

Personnel must not improperly disclose, misuse, or exploit confidential information for personal or commercial benefit.

SNBiz shall also seek to compete fairly by avoiding collusion, bid-rigging, deceptive marketing, and other improper commercial practices.

Public statements about SNBiz's qualifications, certifications, memberships, and professional capabilities must be accurate and verifiable.

15. Reporting Concerns & Whistleblower Protection

SNBiz encourages employees, trainers, assessors, suppliers, clients, and other stakeholders to report suspected bribery, corruption, fraud, conflicts of interest, or unethical conduct.

Reports may be submitted to the Chief Executive Officer or another designated responsible person through established organizational communication channels.

SNBiz shall seek to:

- Treat reports seriously and objectively.
- Protect confidentiality to the extent reasonably possible and permitted by law.
- Prevent retaliation against individuals reporting concerns in good faith.
- Review allegations fairly and without unnecessary delay.
- Maintain appropriate records of investigations and outcomes.

Knowingly false or malicious allegations may themselves constitute misconduct; however, a good-faith report shall not be penalized merely because it is not substantiated.

16. Investigation & Corrective Action

Suspected violations of this policy shall be reviewed by authorized personnel.

Investigations shall be conducted fairly, proportionately, and with appropriate confidentiality.

Where misconduct is substantiated, SNBiz may take action including:

- Corrective or preventive measures.
- Additional training or supervision.
- Reassignment or removal of decision-making authority.
- Disciplinary action, up to termination of employment or contractual engagement.
- Termination of business relationships.
- Referral to appropriate authorities where legally required or warranted.

Actions shall be consistent with applicable laws, contractual obligations, and fair procedures.

17. Legal & Regulatory Compliance

SNBiz is committed to complying with applicable anti-corruption, commercial, employment, and other relevant laws of Bangladesh, including applicable provisions of the Prevention of Corruption Act, 1947, the Anti-Corruption Commission Act, 2004, and other relevant legislation.

Where SNBiz operates under international client contracts or engages in cross-border business activities, applicable contractual anti-bribery requirements and relevant foreign laws shall also be considered.

The principles of this policy are informed by internationally recognized ethical business practices and the anti-bribery management framework described in ISO 37001.

18. Training, Communication & Awareness

SNBiz shall promote awareness of ethical conduct and anti-bribery responsibilities among relevant personnel.

Activities may include:

- Communicating this policy during employee and trainer orientation.
- Providing relevant ethics and anti-bribery guidance.
- Discussing conflicts of interest and procurement integrity.
- Reinforcing assessment and certification impartiality.

- Sharing lessons learned from identified ethical risks.
- Informing relevant suppliers and partners of expected standards.

19. Responsibilities & Accountability

Chief Executive Officer / Management

Responsible for approving this policy, providing leadership, establishing appropriate controls, reviewing significant concerns, and ensuring that reported matters are addressed.

Employees, Trainers & Assessors

Responsible for following this policy, maintaining professional integrity, avoiding improper influence, and reporting suspected misconduct.

Procurement & Administrative Personnel

Responsible for maintaining transparent purchasing processes, appropriate approvals, and accurate transaction records.

Contractors, Suppliers & Business Representatives

Expected to conduct activities on behalf of SNBiz ethically and comply with applicable contractual anti-bribery obligations.

20. Monitoring, Review & Continual Improvement

SNBiz shall periodically review ethical and bribery-related risks, particularly in procurement, contract management, training assessments, certification, and third-party relationships.

Management shall consider relevant reports, control weaknesses, investigation findings, and improvement opportunities.

This policy shall be reviewed at least annually, or earlier following significant legal, organizational, or operational changes.

21. Management Declaration

Shatabdi NetBiz recognizes that professional credibility cannot be separated from ethical responsibility.

We are committed to building long-term relationships through fair competition, transparent transactions, objective competency assessment, and responsible business decisions.

We will not compromise our integrity for commercial advantage.

Our commitment is to operate with honesty, prevent bribery and corruption, protect stakeholder trust, and promote a culture of ethical excellence.

Integrity in Every Decision. Transparency in Every Transaction. Accountability in Every Action.

For and on behalf of Shatabdi NetBiz (SNBiz)

Approved By: Chief Operations Officer

Signature: _____

Approval Date: _____

Next Review Date: _____

This policy becomes effective following formal management approval and communication to relevant personnel.