

# MaGC Policy 14: Financial Integrity Policy

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1.0

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## 1. Our Core Commitment: Zero Tolerance

MaGC maintains **zero-tolerance** toward all forms of bribery, corruption, and financial fraud. Our reputation is built on management by values - Professional values, Ethical values, Human values, & Spiritual values (our code of ethics). Every MaGCian is responsible for upholding this policy.

## 2. What is Prohibited

This policy applies globally to all employees, sub-consultants, contractors, associates, and partners acting on MaGC's behalf (MaGCian).

### i. Anti-Bribery and Anti-Corruption

Bribery is the offering, promising, giving, requesting, or accepting of anything of value (directly or indirectly) to improperly influence any business or government decision.

- **Bribes are Illegal:** MaGCians must never offer or accept a bribe. This includes Facilitation Payments (small sums paid to secure or speed up routine government actions).
- **Third Parties:** MaGCians must never ask a third party (agent, partner, or client) to do something on MaGC's behalf that they cannot legally or ethically do themselves.
- **Public Officials:** Strict limits apply when dealing with Government Officials. MaGCians must never offer gifts, payments, or excessive hospitality to influence official decisions. Consult leadership *before* engaging with any government official.

### ii. Financial Misconduct and Fraud

Financial Misconduct is any intentional deception to secure an unfair or unlawful financial gain for oneself or for MaGC.

- **Accurate Reporting:** All records, including employee KYC, timesheets (Clockify), training records, expense reports, invoices, and financial data, must be accurate and truthful. Falsifying any record is a violation.
- **Misuse of Assets:** Company assets (funds, equipment, IP) must not be diverted, misused, or stolen for personal benefit.
- **Money Laundering:** Employees must never be involved in activities designed to conceal or disguise the origins of illegally obtained money.

### 3. Rules on Gifts, Hospitality, and Expenses

Gifts and entertainment are common in consulting but must be reasonable, infrequent, and transparent to prevent the appearance of undue influence.

- i. **Acceptable Gifts & Hospitality:** Gifts and hospitality may only be offered or accepted if they meet *all* of the following criteria:
  - They are infrequent and of nominal value (e.g., promotional items, small celebratory gifts). The maximum threshold limit per recipient per occurrence is ₹2,500.
  - They are transparent and recorded.
  - They are given or received openly, not secretly.
  - They are legal and compliant with both MaGC policy and the recipient/giver's company policy.
- ii. **Forbidden Items:** Never offer or accept cash, cash equivalents (gift cards, loans), or extravagant gifts.
- iii. **Business Expenses:** All business expenses must be necessary, directly related to MaGC business, and accompanied by proper receipts.

### 4. Reporting and Consequences

- i. **Reporting:** If a violation of this policy is suspected, report it immediately, using the guidelines and channels defined in the **Whistleblower Protection Policy**.
- ii. **Non-Retaliation:** MaGC guarantees protection against retaliation for any good-faith report.
- iii. **Consequences:** Any employee found to be in violation of this policy will face strict disciplinary action, up to and including termination of employment and referral to legal authorities.