



(A Government of India Undertaking)

**Anti Bribery Management System Manual
[As per IS 37001:2016 Standard]**



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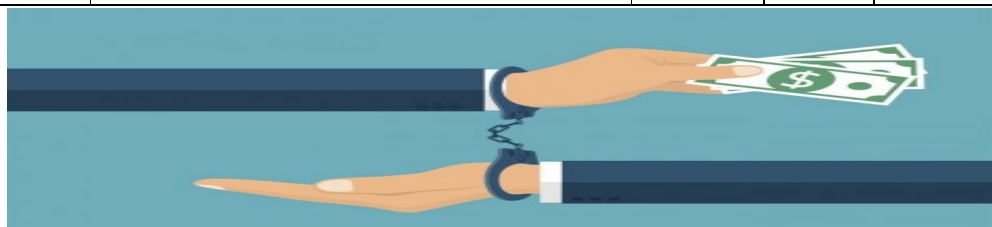
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Document Approval

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The signatures below certify that this Anti Bribery Management system manual has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	DIVYENDU RAWAT		MANAGER (VIG.)	24/08/2023
Reviewed by	ALOK KUMAR SINGH		DEPUTY GENERAL MANAGER (VIG.)	24/08/2023
Approved by	AMIT KUMAR SINGH		MANAGING DIRECTOR	24/08/2023

Amendment Record

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This manual is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

S #	IS 37001:2016 Clause No.	Changes Incorporated	Reasons for change	New Revision No.	Date
1	3, 4, 6, 7, 8, 9 and 10 (and sub-clauses under these main clauses)	Procedure and cross reference are updated	Stage 1 Audit observations	01	08/09/2020
2	5.1.2,6.2 and 9.3.4	Procedure and cross reference are updated	Stage 2 Audit observations	02	14/10/2020
3	5 , 7 (sub-clauses under these main clauses) and D/ABMS/OB	Procedure and cross reference are updated	2nd Surveillance Audit observations	03	24/08/2023

Note: This amendment record is filled up whenever changes are made in this document.



Company Proprietary Information

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Abbreviations, Acronyms, Terms & Definitions

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Abbreviations:

AMC	Annual Maintenance Contract
ANNEX	Annexure
AGM	Assistant General Manager
BOD	Board of Directors
BIS	Bureau of Indian Standard
CPCB	Central Pollution Control Board
CC	Construction Cell
CE	Chief Engineer
CFS	Container Freight Station
CHA	Custom House Agent
CO	Corporate Office
CVO	Chief Vigilance Officer
CW	Central Warehouse
CWC	Central Warehousing Corporation
CRWC	Central Rail Side Warehouse Company Limited
DMR	Deputy Management Representative
DOC	Document
DPCC	Delhi pollution control committee
D (F)	Director (Finance)
DP	Director (Personnel)
D(MCP)	Director (Marketing and Corporate Planning)
DGM	Deputy General Manager
EA	Environmental Audit
EE	Executive Engineer
FMEA	Failure mode effect analysis
EMS	Environmental Management System
MD	Managing Director
HO	Head office
HoD	Head of the Division
HR	Human Resource
GGM	Group General Manager
GM	General Manager
SECY	Secretary
ICD	Inland Clearance Depot
IQA	Internal Quality Audit
IA	Internal Audit
IS	Indian Standard



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ISO	International Organization for Standardization
MRM	Management Review Meeting
MOU	Memorandum of Understanding
MR	Management Representative
MOE&F	Ministry of Environment and Forest
OCP	Operational control procedure
PO	Purchase Order
PUR	Purchase
QTY	Quantity
RC	Recycle
REC	Records
REV	Revision
NC	Non Conformance
NCR	Non Conformance Report
No	Number
OHSAS	Occupational Health and Safety Assessment Specifications
QM	Quality Manual
QMS	Quality Management System
RM	Regional Manager
RMR	Regional Management Representative
RO	Regional Office
CFS	Container Freight Station
SOP	System Operating Procedure
SL	Serial
SOW	Scope of work
Specs	Specifications
Sr	Senior
TMT	Top Management Team
Trng.	Training
RTMT	Regional Top Management Team
WM	Warehouse Manager
WI	Work Instruction

Terms and Definitions:

Some of the terms and definitions used in this manual are given here asunder.

General:

Audit: systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled

Auditee: Individual/ Group/ Organization being audited.

Auditor: Person with the competence to conduct an audit (includes trained internal auditors).

Audit Scope: Extent and range of a given audit

Continual improvement: Recurring activity to increase the ability to fulfil requirements

Correction: Action to eliminate a detected **nonconformity**

NOTE: Correction can be, for example, **rework** or **re-grade**.

Corrective action: Action to eliminate the cause of a detected nonconformity or other undesirable situation

Document: Information and its supporting medium

Information: Meaningful data

Infrastructure: System of facilities, equipment and services needed for the operation of an organization

Interested party: Person or group having an interest in the performance or success of an organization

Management: coordinated activities to direct and control an organization

Management system: system to establish policy and objectives and to achieve those objectives

Record: document stating results achieved or providing evidence of activities performed

System: set of interrelated or interacting elements

Top management: person or group of people who directs and controls an organization at the highest level

Work environment: set of conditions under which work is performed

Terms specific to IS 37001:2016 ABMS:

Controlled Copy: A copy of a document whose revision is communicated to the holder whenever it is carried out

Correction: Action taken to eliminate a detected non-conformity

Corrective Action: Action taken to eliminate the causes of a detected non-conformity or other undesirable situation in order to ensure that the non-conformity does not occur again i.e. prevent recurrence

Client Satisfaction: Client's perception of the degree to which the client's requirements have been fulfilled. Client complaints are a common indicator of low client satisfaction but their absence does not necessarily imply high client satisfaction.

Context of the organization:-Combination of internal and external issues that can have an effect on an organization's approach to developing and achieving its objectives

Document: Information and the medium on which it is contained

Documented information -Information required to be controlled and maintained by an organization and the medium on which it is contained

Interested party:-Stakeholder person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity

Organization:-Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives.

Object: Entity, item, anything perceivable or conceivable

Management: Coordinated activities to direct and control an organization.

Mission: Organization's purpose for existing as expressed by top management

Non-Conformity: Non-fulfilment of a requirement.

Process: Set of interrelated or interacting activities that use inputs to deliver an intended result.

Procedure: Specified way to carry out an activity or a process.

Policy: Organization intentions and direction of an organization as formally expressed by its top management

Product: Output of an organization that can be produced without any transaction taking place between CWC and the customer.

Quality: Degree to which a set of inherent characteristics of an object fulfils requirements





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Quality management: Management with regard to quality

Quality Policy: Policy related to quality need or expectation that is stated, generally implied or obligatory

Regulatory requirement: obligatory requirement specified by an authority mandated by a legislative body

Risk: effect of uncertainty

Record: Document stating results achieved or providing evidence of activities performed

Strategy: plan to achieve a long-term or overall objective

Statutory requirement: obligatory requirement specified by a legislative body

Service: Output of an organization with at least one activity necessarily performed between CWC and the customer

Vision: Organization aspiration of what an organization would like to become as expressed by top management.



About Central Warehousing Corporation

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2.0 About the CENTRAL WAREHOUSING CORPORATION

जन जन के लिए भण्डारण
WAREHOUSING FOR EVERYONE

CWC - A PIONEER PUBLIC WAREHOUSING ORGANIZATION:

Central Warehousing Corporation was established during 2nd March 1957 to provide logistics support to the agricultural sector. Initially, the administration of the Act was assigned to Ministry of Agriculture but since the creation of Department of Co-operation in January, 1959, the overall administration of CWC has been vesting with Department of Food. In pursuance of the above decision, the Agricultural Produce (Development & Warehousing) Corporation Act, 1956 was repealed and replaced by the Warehousing Corporation Act, 1962. It is a public Warehouse operator offering logistics services to diverse group of clients. CWC operates 422 Warehouses across the country with a storage capacity of 99.80 lakh MT providing warehousing services. These services include food-grain warehouses, industrial warehousing, custom bonded warehouses, container freight stations, inland clearance depots and air-cargo complexes.

Apart from storage and handling, CWC also offers services in the area of clearing & forwarding, handling & transportation, procurement & distribution, dis-infestation services, fumigation services and other ancillary activities.

CWC also offers consultancy services/ training for the construction of warehousing infrastructure to different agencies.

Function of CWC:

The Warehousing Corporation act, 1962: Subject to the provisions of this Act, the Central Warehousing Corporation may-

- Subscribe to the share capital of a State Warehousing Corporation;
- Act as agent of the Government for the purposes of the purchase, sale, storage and distribution of agricultural produce, seeds, manures, fertilizers, agricultural implements and notified commodities; and
- Carry out such other functions as may be prescribed.

The Warehousing Corporation (Amendment) Bill, 2011 has been proposed in the Lok Sabha by the Ministry of consumer affairs, Food and Public Distribution seeking to make Mini-

Ratna company Central Warehousing Corporation (CWC) an independent body without government being a guarantor.

Operations of CWC:

CWC operations include scientific storage and handling services for more than 400 commodities include Agricultural produce, Industrial raw-materials, finished goods and variety of hygroscopic and perishable items.

- Scientific Storage Facilities for commodities including hygroscopic and perishable items through network of 422 warehouses in India with its 3,042 trained personnel.
- Import and Export Warehousing facilities at its 24 Container Freight Stations in ports and inland stations.
- Bonded Warehousing facilities.
- Dis-infestation services.
- Handling, Transportation & Storage of ISO Containers.

CWC enables the movement of imported and exportable goods to and from the port towns and has developed infrastructure of Container Freight Stations & Inland Clearance Depots throughout the country. It operates 30 CFSs/ICDs where composite services for containerized movement of import/export cargo are provided. The Warehousing Corporation is empowered to acquire and build Warehouses for storage of Agricultural produce, seeds, fertilizers and other notified commodities and also to act as an agent of the Central Warehousing Corporation or of the Government, for the purpose of purchases, sales storage, distribution etc., of Agricultural Commodities in time of need. Though it has been criticized for lack of manpower and technologically equipped warehousing facility.

CWC: HANDLING EVERYTHING EVERYWHERE:

Besides the scientific storage and preservation of stocks, the most important function is the Handling and Transportation of stocks including the other logistics activities. At present, the Corporation is storing and handling more than 400 notified commodities at more than 422 Warehouses, situated at different locations all over the country.



CWC- ROLE MODEL FOR FARMERS:

CWC is pacing ahead having educated 2.38 lakh of farmers in Pest Control Techniques during last twelve months and minimized post-harvest losses at the farm level storage. The Farmers Extension Service Scheme was started in 1978-79 with an objective of educating farmers about advantages of scientific storage and use of Public warehouses and is being operated at 422 Warehouses throughout the country. CWC is pacing ahead having educated 62.41 lakh farmers on Modern Scientific Storage Techniques to minimize post-harvest losses at the farm level storage.

CWC-EXPANSION THROUGH DIVERSIFICATION:

The Corporation realizes that decision of today, will make the business of tomorrow. The outworn thoughts/working has always been upgraded with the innovation in service, Warehousing, skills and activities. The Corporation has carved a niche by developing a common core of unity in diversity from Conventional Business of Storage of Agricultural Commodities/inputs. The journey started with seven general Warehouses and today the Corporation has been operating Warehouses including ICDs, Custom Bonded Warehouses, Truck / Freight Terminals, Air Cargo Complexes etc. Of late, the CWC has also commenced the operation of handling and movement of Container trains for the designated locations. This is a step forward from the aggregation of domestic cargo and transportation other thereof through railway wagons between the two warehousing complexes. The corporation also has plans to augment and expand its Cold Storage business across the country.

**CWC - THE TASK FORCE:**

Work has been central to man's consciousness for untold ages. The Corporation has groomed its human resources so as to develop perfect harmony in work, working and workers. The motto of CWC is "RIGHT PERSON FOR THE RIGHT JOB" and vice-versa, which requires continuous upbringing of employees through various programmes.

The Warehousing Industry is Labour Intensive which involves engagement of unskilled, semi-skilled and skilled workers at the Warehouses. At most of the Warehouses, the Labour is arranged through outsourcing by engaging experienced contractors.

CWC - A COMMITMENT OF PEST FREE ENVIRONMENT:

Blessed with the domain expertise of Pest Management at the designated Warehouses in the country, CWC was entrusted the additional function of disinfestations and pest control of food grain premises and other notified areas outside its Warehouses to ensure prevention of undue food losses and to keep the environmental pest free. Having been duty recognized by the Directorate of Plant Protection Quarantine & Storage, Govt. of India as well as by Export Inspection Council of India, CWC provides its State-of-the-art Pest Control services to farmers, traders, Hospitals, Hotels & Restaurants, Railway Coaches & Pantry Cars, Airports & Aircrafts, Ports & Ships, Factories & Containers Fumigations, Oil Refineries & Petro Chemical Complexes, in the area of Grain Pest & Household pest management, Rodent control, Termite control & Quarantine Pest Management.

CWC - GOING GLOBAL:

While operating more than 24 Container Freight Stations and Inland Clearance Depots across India, apart from three Air Cargo Complexes and 3 Integrated Check posts (ICP), in addition

to the big chain of Custom Bonded Warehouses to facilitate the trade, CWC's support services to Foreign Trade is valuable contribution to Nation. In the spirit of globalization, the Corporation also plans to undertake warehousing overseas.

CWC - A LOT MORE TO PROVIDE:

1. Consultancy Service are conferred by conducting Techno-feasibility studies in respect of designing, construction and management of warehouses besides ISO Certification etc.
2. Scientific Preservation of Stocks extending the required infrastructural facilities.
3. 30 percent rebate on Storage Charges for farmers.
4. Special thrust for imparting education to the farmers through FESS Programmes.
5. Dis-infestation of Agricultural Produce, Factory Premises, Containers and Pre-shipment Fumigation of Export Cargo / Aircraft and Ships.
6. Aggregating Export Cargo & de-vanning of imported stocks at our Container Freight Stations and Inland Clearance Depots.
7. Handling, Transportation, Storage, Vanning / De-vanning of International / Domestic Containers.

CWC MISSION:

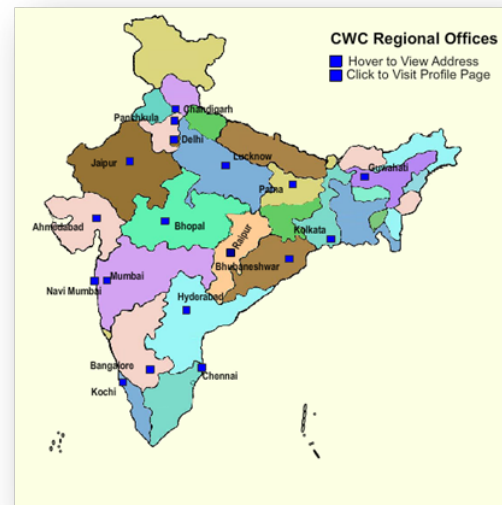
To provide reliable, cost-effective, value-added and integrated warehousing and logistics solutions in a socially responsible and environment friendly manner.

CWC VISION:

To emerge as a leading market facilitator by providing integrated warehousing infrastructure and other logistics services, supporting India's growing economy with emphasis on stakeholder satisfaction.

CWC OBJECTIVES:

- To be a major player in providing pest control services using environment friendly methods.
- To assist in implementation of Warehousing(Development & Regulation) Act, 2007 with a view to expand credit potential of Warehoused goods through banking institutions and NBFCs.
- To plan and diversify across the logistics value chain, through forward and backward integration in areas such as port handling, procurement and distribution, cold chain, warehousing financing, 3PL, consultancy services, multi – modal transport etc.
- To achieve global presence in the warehousing and logistics field.



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- To plan and implement Human Resource Development programmes to improve commitment, motivation and productivity of employees for achieving customer satisfaction.
- To reduce losses during warehousing, handling and distribution.
- To meet changing needs of agriculture, trade, industry and other sectors by providing scientific warehousing and related infrastructural facilities.

CWC Regional offices across India:**14 Regional office locations**

Ahmedabad	Delhi	Kolkata
Bangalore	Guwahati	Lucknow
Bhopal	Hyderabad	Mumbai
Chandigarh	Jaipur	Patna
Chennai	Kochi	

3.0 Scope & Boundary for ABMS

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SCOPE :

Application of Anti Bribery Management System:

“The warehousing and other Associated logistics for food grains, Agricultural inputs & produce, Notified commodities, Imported/Exportable Goods in CWC owned General /Customer Bonded Warehouses, Inland Clearance Depots, Container Freight Stations and Air Cargo Complexes including Pest Control Services”.

LOCATION COVERED UNDER CERTIFICATION

The scope of establishing, implementing and maintaining CWC activities in accordance with IS 37001:2016 standard requirements are limited to following location only. Business operations of CWC are handled from one operational location.

Standard Scope of IS 37001:2016		
Boundary: Corporate Office at New Delhi, along-with 14 Regional Offices.		
Location	Product/Service	Process covered
Corporate Office at: 4/1, Siri Institutional Area, August Kranti Marg, Hauz Khas, New Delhi 110016 India.	<ul style="list-style-type: none"> • Warehousing and other associated logistics for food grains, Agricultural inputs & produce, Notified commodities, Imported/Exportable Goods in CWC owned General/Customer Bonded Warehouses, Inland Clearance Depots, Container Freight Stations and Air Cargo Complexes and • Pest Control Services at customer sites and in-house. 	<ul style="list-style-type: none"> - Sales and Marketing - Warehouse Management <ul style="list-style-type: none"> ○ Commercial ○ Technical ○ Engineering ○ Planning ○ Research & Development ○ PCS ○ Corporate Planning ○ B&C ○ Inspection - Purchase - Internal audit - MIS - Projects - QS & MR - Personnel - Finance

4.0 Context of the Organization

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4.Context of the organization:

4.1 Understanding CWC and its context:

CWC has established a system to determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the objectives of its anti-bribery management system through **SWOT Assessment**. These issues include, without limitation, the following factors:

- a) the size, structure and delegated decision-making authority of the organization;
- b) the locations and sectors in which CWC operates or anticipates operating;
- c) the nature, scale and complexity of the organization's activities and operations;
- d) the organization's business model;
- e) the entities over which CWC has control and entities which exercise control over
- f) the organization's business associates;
- g) the nature and extent of interactions with public officials;
- h) applicable statutory, regulatory, contractual and professional obligations and duties.



Cross Reference :

- **Context Mapping**
[D/ABMS/CM-02 dated 08.09.2020]

4.2 Understanding the needs and expectations of stakeholders

CWC has established a system to determine the internal & external interested parties and address the same along with the responsibilities of CWC officials.

Cross Reference :

- **Needs & Expectation of Stakeholders** **[D/ABMS/N&E-02 dated 08.09.2020]**



4.3 Determining the scope of the anti-bribery management system:

Scope for ABMS Implementation :

“The warehousing and other Associated logistics for food grains, Agricultural inputs & produce, Notified commodities, Imported/Exportable Goods in CWC owned General /Customer Bonded Warehouses, Inland Clearance Deports, Container Freight Stations and Air Cargo Complexes including Pest Control Services”.

Boundary for ABMS Implementation :

Corporate Office, New Delhi and following 14 Regional Offices :

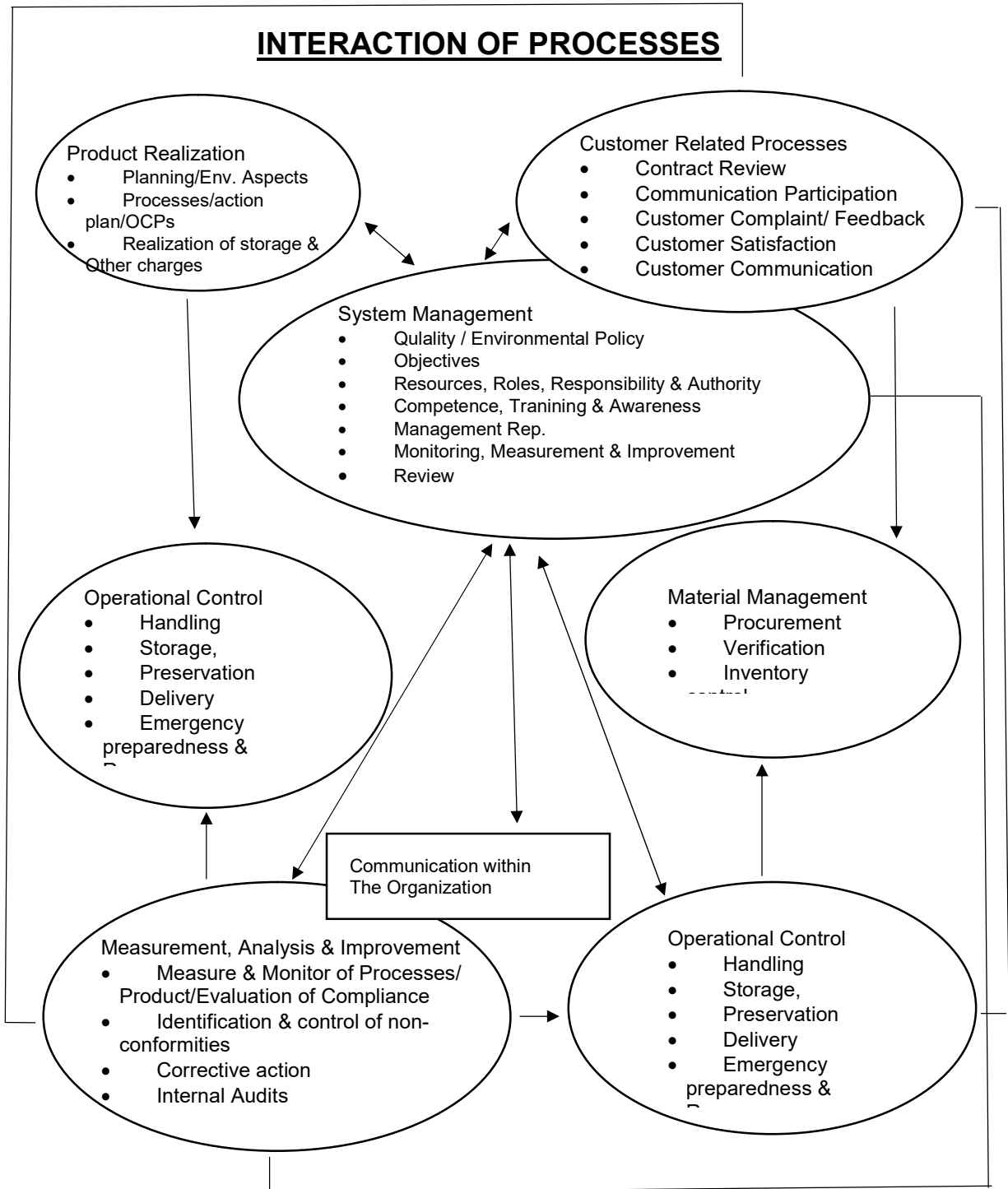
Sr. No.	Regional offices
1	Ahmedabad
2	Bangalore
3	Bhopal
4	Chandigarh
5	Chennai
6	Delhi
7	Guwahati
8	Hyderabad
9	Jaipur
10	Kochi
11	Kolkata
12	Lucknow
13	Mumbai
14	Patna

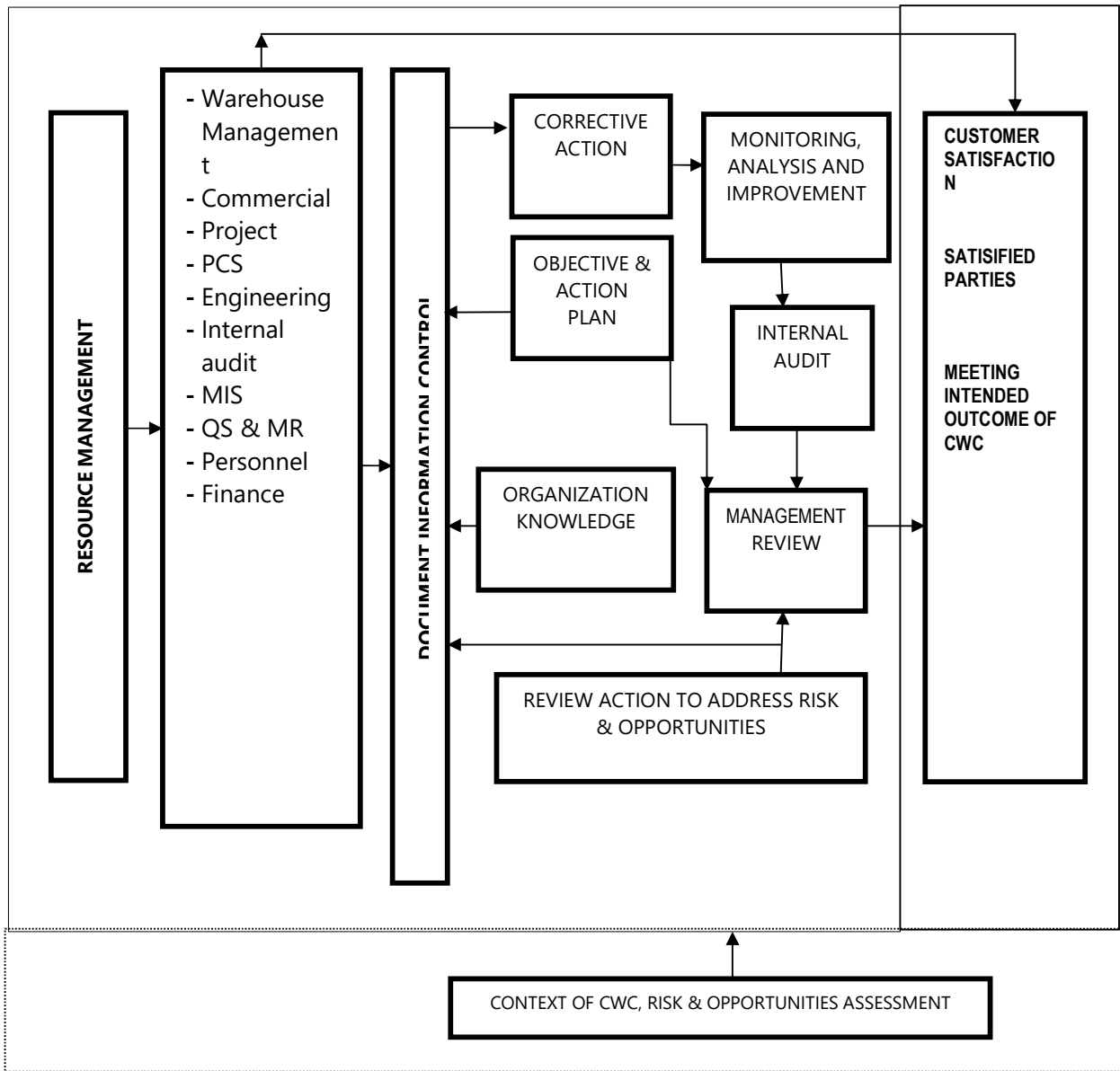
4.4 Anti-bribery management system:

CWC has established interaction process within Organisation.

Cross Reference :

- **Interaction of Processes**





4.5 Bribery risk assessment:

CWC has established a system to prepare a risk assessment Methodology in respect of ABMS. CWC shall undertake regular bribery risk assessment(s) and accordingly risk shall be assessed.

Risk & Opportunity Assessment Review is done;

- (a) at least once in a year**
- (b) During Management Review Meeting**
- (c) during Management of Change and**
- (d) as and when required as per advice of the Governing Body and Top Management, Customers and Stakeholders.**



Cross Reference :

- **Risk Methodology [D/ABMS/RM 02 dated 08.09.2020]**
- **Risk & Opportunity Assessment [F/ABMS/Risk 02 dated 08.09.2020]**



5.0 Leadership

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5. Leadership:

5.1 Leadership and Commitment:

5.1.1 Governing Body:

Board of Directors of CWC act as Governing Body, which demonstrate leadership and commitment with respect to the anti- bribery management system:

- a) ensuring that the organization's strategy and anti-bribery policy are aligned;
- b) at planned intervals, receiving and reviewing information about the content and operation of the organization's anti-bribery management system;
- c) requiring that adequate and appropriate resources needed for effective operation of the anti-bribery management system are allocated and assigned;
- d) exercising reasonable oversight over the implementation of the organization's anti-bribery management system by top management and its effectiveness.

Cross Reference :

- List of Governing Body Members [Warehousing Corporations Act, 1962]
- Minutes of Governing Body Meeting

5.1.2 Top Management:

Besides the Governing Body, the Managing Director identified the Top management Team who shall demonstrate leadership and commitment with respect to the anti-bribery management system by:

- a) Approving the organization's anti bribery policy.
- b) ensuring that the anti-bribery management system, including policy and objectives, is established, implemented, maintained and reviewed to adequately address the organization's bribery risks;
- c) ensuring the integration of the anti-bribery management system requirements into the organization's processes;



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- d) deploying adequate and appropriate resources for the effective operation of the anti-bribery management system;
- e) communicating internally and externally regarding the anti-bribery policy;
- f) communicating internally the importance of effective anti-bribery management and of conforming to the anti-bribery management system requirements;
- g) ensuring that the anti-bribery management system is appropriately designed to achieve its objectives;
- h) directing and supporting personnel to contribute to the effectiveness of the anti-bribery management system;
- i) promoting an appropriate anti- bribery culture within the organization;
- j) promoting continual improvement;
- k) supporting other relevant management roles to demonstrate their leadership in preventing and detecting bribery as it applies to their areas of responsibility;
- l) encouraging the use of reporting procedures for suspected and actual bribery;
- m) ensuring that no personnel will suffer retaliation, discrimination or disciplinary action for reports made in good faith, or on the basis of a reasonable belief of violation or suspected violation of the organization’s anti-bribery policy, or for refusing to engage in bribery, even if such refusal can result in CWC losing business (except where the individual participated in the violation);
- n) at planned intervals, reporting to the governing body (if any) on the content and the operation of the anti-bribery management system and the allegations of serious or systematic bribery.

TOP MANGEMENT:

MANAGING DIRECTOR:

The Managing Director is the Chief Executive, who has the overall responsibility to ensure that the activities of the CWC as described in the Quality and Environmental manual are properly planned, organized, managed and implemented in tandem with the laid down procedure. He is responsible for approving the organization’s anti bribery policy.

The Managing Director has the full authority to exercise such powers and perform such duties as the Board of Directors of the CWC may entrust or delegate to him. He has full authority to implement all policy matters as per the guidelines and to plan, organize, control and direct the activities of the Corporation on business principals having regard to public interest.

**DIRECTOR (FINANCE):**

Director (Finance) is responsible for managing all the activities pertaining to Finance, Accounts, Recovery and Internal Audit Divisions of the Organization. He is also looking after the MIS Division and B&C Division. He is responsible for quality services for coordination and control of such activities within the organization. He reports to the Managing Director.

DIRECTOR (PERSONNEL) :

Director (Personnel) is responsible for managing all activities pertaining to Administration, Personnel Affairs, Industrial Relations as well as the human resources development within the Corporation. He is also looking after the Purchase Division. He is responsible for quality services for coordination and control of such activities within the organization. He reports to the Managing Director.

DIRECTOR (M&CP):

Director (M&CP) is responsible for managing all activities pertaining to commercial, Corporate planning, Marketing, Commercial Projects and Engineering Division. He is also looking after Technical Division, R&D Division, Planning Division, QS Division and Corporation Division. He reports to the Managing Director.

CHIEF VIGILANCE OFFICER:

Chief Vigilance Officer acts as the Head of Vigilance work and is responsible for undertaking the activities pertaining to preventive checks and having a sound vigilance network. He is also responsible for quality services in the Vigilance set up of the Organization. He is responsible for approving the ABMS Objectives & reports to the Managing Director.

MIDDLE MANAGEMENT:**SECRETARY:**

The Secretary is acting in this capacity to the Board of Directors of the Corporation. He is responsible for controlling all the activities related to Corporation and Board & Coordination Divisions which are in his direct administrative control, in addition to any further duty allocation. He reports to the Director (Personnel)/M&CP/Finance as per direction of Managing Director.

HOD at Corporate Office

HOD means the officer designated to work as HODs of various following divisions of the Corporate Office. Individual HOD is responsible for the quality of work falling under their respective domain and to deal with the issues related thereto for the development and implementation of process/procedures/solutions.

DIVISIONS:

- B&C Division
- Commercial Division
- New Business Project & Planning Division
- Business Data Analytics & Marketing Division
- Engineering Division
- Finance Division [Sub-Division : Internal Audit]
- MIS Division
- Personnel Division (Sub Division: Publicity and Purchase)
- Technical Division (Sub Division: Pest control, Research & Development)
- QS Division
- Inspection Division
- Vigilance Division

REGIONAL MANAGER:

He is responsible and authorized for planning, directing, controlling actions pertaining to growth and expansion of the Region, to implement policy matters, identify locally applicable statutory and regulatory requirements as per guidelines of Corporate Office, customer's needs, repairs and maintenance of the infrastructure, complaints / suggestions and customer satisfaction through the Sectional Heads, Warehouse Managers to establish, implement and maintain the systems, upgrade the information on environmental aspects & legislations and deal with emergent situations. Vigilance Co-ordinators of each Region shall act as Regional Management Representative (RMR) to discharge the duties of Management Representative at Regional level. He is responsible for conducting Management Review at Regional level, and to send a report of the performance of the System to the MR at Corporate Office.

**MANAGEMENT REPRESENTATIVE (ABMS):**

Managing Director has appointed the HOD(QS) as Management Representative (MR). MR is responsible and authorized for ensuring that Anti Bribery Management Systems are established, implemented and maintained in accordance with the IS 37001:2016. He is responsible for reporting on the performance of Systems to the Management for review as a basis for improvement of Systems with the support of Regional Management Representatives (RMRs). He is also responsible for liaisoning with external certification body on behalf of the management.

ALL EMPLOYEES OF CWC

All Employees of CWC shall understand the importance and requirements of ABMS of CWC. All Employees of CWC shall abide by all the requirements, report to the Competent Authority / CVO / Vigilance Department if any ABMS related Non Compliance is identified.



5.2 Anti-Bribery Policy:

CENTRAL WAREHOUSING CORPORATION is committed to provide warehousing and logistics services of global standards through customer friendly, efficient, 'Transparent system' and carry out all its activities in a manner that ensures effective 'Anti Bribery Management System'.

We shall strive to achieve continual improvement of our 'Anti Bribery Management System (ABMS)' through :

- ❁ Identification of Risks on Anti-Bribery
- ❁ Prohibition of Bribery in our Organization
- ❁ Compliance to all applicable legal requirements
- ❁ Establishing a Management System encouraging raising concerns in good faith, or on the basis of a reasonable belief in confidence, without fear of reprisal;
- ❁ Establishing a Management System explaining the authority and independence of the anti-bribery compliance function
- ❁ Establishing a Management System explaining the consequences of not complying with the anti-bribery policy.
- ❁ involvement of & contribution from all employees

The anti-bribery policy is made available on CWC website, HRMS and prominent locations of CWC premises. It shall be available in Hindi and English. This document shall be issued under the signature of Managing Director.

Cross Reference :

- **ABMS Policy: [ABMS Revision 3.0 dated 24/08/2023]**

5.3 Organizational Roles, Responsibilities and Authorities:

5.3.1 Roles and Responsibilities:

CWC has established a system to define Roles and Responsibility of the Governing Body/Top Management/all the HoDs and employees in respect of ABMS.

Cross Reference :

- **ABMS Roles & Responsibility [D/ABMS/RR 02 dated 08.09.2020]**

5.3.2 Anti-Bribery Compliance Function:

Top management has established a system to assign to an anti-bribery management system;

- a) overseeing the design and implementation by CWC of the anti-bribery management system;
- b) providing advice and guidance to personnel on the anti-bribery management system and issues relating to bribery;



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- c) ensuring that the anti-bribery management system conforms to the requirements of this document;
- d) reporting on the performance of the anti-bribery management system to the governing body (if any) and top management and other compliance functions as appropriate.

Vigilance Division of CWC shall implement ABMS in CWC. Managing Director on time to time appoint Anti-bribery Compliance function/Core Committee to monitor/review the implementation of ABMS.

5.3.3 Delegated Decision- making:

Where top management delegates to personnel the authority for the making of decisions in relation to which there is more than a low risk of bribery, CWC has established a system to establish and maintain a decision-making process or set of controls which requires that the decision process and the level of authority of the decision makers are appropriate and free of actual or potential conflicts of interest. Top management ensure that these processes are reviewed periodically as part of its role and responsibility for implementation.

Cross Reference :

- Central Warehousing Corporation (Staff) Regulations, 1986.
- Delegation of Power



6.0 Planning

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6.Planning:

6.1 Actions to address risks and opportunities:

CWC has established a system to plan to address bribery risks and opportunities for improvement. This shall be identified by Compliance Team and reviewed by Top Management.

Cross Reference :

- Risk & Opportunity Assessment [F/ABMS/Risk 02 dated 08.09.2020]

6.2 Anti-bribery objectives and planning to achieve them:

CWC has established a system to establish anti-bribery management system objectives at relevant functions and levels. Core Compliance Team set an objective in each financial year with the approval of CVO and these objectives are communicated to all the employees through HRMS. CWC has established a system to retain documented information on the anti-bribery management system objectives:

Cross Reference :

- ABMS Objectives [D/ABMS /OB 02 dated 08.09.2020]



7.0 Support

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7 Support:

7.1 Resources:

CWC has established a system to determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the anti-bribery management system.

Cross Reference :

- CWC Budget Estimate
- Vigilance Department, Corporate Office, New Delhi
- Vigilance Coordinators of CWC

7.2 Competence:

7.2.1 General:

CWC has established a system to prepare a ABMS Skill Matrix and regular training will be given to all the employees to enhance their competence.

Cross Reference :

- ABMS Skill Matrix [[D/ABMS/SM/02 dated 08.09.2020](#)]
- Induction for the new employees
- Central Warehousing Corporation (Staff) Regulation, 1986

7.2.2 Employment process:

7.2.2.1 In relation to all of its personnel, CWC shall implement procedures such that:

- a) conditions of employment require personnel to comply with the anti-bribery policy and anti-bribery management system, and give CWC the right to discipline personnel in the event of non-compliance ;



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- b) within a reasonable period of their employment commencing personnel receive a copy of, or are provided with access to, the anti-bribery policy and training in relation to that policy;
- c) CWC has procedures which enable it to take appropriate disciplinary action against personnel who violate the anti-bribery policy or anti-bribery management system;
- d) personnel will not suffer retaliation, discrimination or disciplinary action (e.g. by threats, isolation, demotion, preventing advancement, transfer, dismissal, bullying, victimization, or other forms of harassment) for:
 - 1) refusing to participate in, or turning down, any activity in respect of which they have reasonably judged there to be a more than low risk of bribery that has not been mitigated by the organization; or
 - 2) concerns raised or reports made in good faith, or on the basis of a reasonable belief, of attempted, actual or suspected bribery or violation of the anti-bribery policy or the anti-bribery management system (except where individual participated in the violation).

7.2.2.2 In relation to all positions which are exposed to more than a low bribery risk, as determined in the bribery risk assessment and to the anti-bribery compliance function, CWC shall implement procedures which provide that:

- a) due diligence is conducted on persons before they are employed, and on personnel before they are transferred or promoted by CWC, to ascertain as far as is reasonable that it is appropriate to employ or redeploy them and that is reasonable to believe that they will comply with the anti-bribery policy and anti-bribery management system requirements;
- b) performance bonuses, performance targets and other incentivizing elements of remuneration are reviewed periodically to verify that there are reasonable safeguards in place to [prevent them from encouraging bribery;
- c) such personnel, top management and the governing body (if any), file a declaration at the reasonable intervals proportionate with the identified bribery risk, confirming their compliance with the anti-bribery policy.

Cross Reference :

- Central Warehousing Corporation (Staff) Regulations, 1986

7.3 Awareness and training:

CWC has established a system to provide adequate and appropriate anti-bribery awareness and training to personnel. Such trainings shall address the following issues, as appropriate, taking into account the results of the bribery risk assessment:

- a) the organization’s anti-bribery policy, procedures and anti-bribery management system and their duty to comply;

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- b) the bribery risk and the damage to them and CWC which can result from bribery;
- c) the circumstances in which bribery can occur in relation to their duties and how to recognize these circumstances;
- d) how to recognize and respond to solicitations or offers of bribes;
- e) how they can help prevent and avoid bribery and recognize key bribery risk indicators;
- f) their contribution to the effectiveness of the anti-bribery management system, including the benefits of improved anti-bribery performance and of reporting suspected bribery;
- g) the implications and potential consequences of not conforming with the anti-bribery management system requirements;
- h) how and to whom they are able to report any concerns ;
- i) Information on available training and resources.

Personnel are provided with anti-bribery awareness and training on a regular basis (at planned intervals determined by the organization), as appropriate to their roles the risks of bribery to which they are exposed and any changing circumstances. The awareness and training programmes shall be periodically updated as necessary to reflect relevant new information.

Taking into account the bribery risks identified, CWC shall also implement procedures addressing anti-bribery awareness and training for business associates acting on its behalf or for its benefit, and which could pose more than a low bribery risk to the organization. These procedures shall identify the business associates for which such awareness and training is necessary, its content, and the means by which the training shall be provided.



CWC retains documented information on the training procedures, the content of the training, and when and to whom it was provided.

CWC controls these activities through the **Procedure on ABMS Management**.

Cross Reference :

- Training Calendar
- Training Record
- Procedure on ABMS Management [P/ABMS/PR01 dated 08.09.2020]

7.4 Communication:

7.4.1 CWC has established a system to determine the internal and external communications relevant to the anti-bribery management system.



INTERNAL COMMUNICATION:

What	When	With whom	How	Who
ABMS Policy	Once gets approved	All Employees / Interested Parties	Display/ Training/HRMS/CWC website	ABMS Core team and Vigilance Coordinator
Importance of Effective ABMS	As per Training Plan	All Employee	Training	ABMS Core team and Vigilance Coordinator
Responsibilities and Authority	As and when required	Employee	Induction / Training	Personnel Division
ABMS Objectives	Every year, once gets approved	All employees	Training/HRMS	ABMS Core Committee
Internal Customer complaint / Feedback (ABMS related)	On receipt of the Feedback / Complaint (ABMS related)	All employees	Grievance Redressal Portal/Training	Vigilance Dept.



EXTERNAL COMMUNICATION:

What	When	With whom	How	Who
Information to external providers on ABMS	Placing purchase / Work order / Quotation collection / Agreement	Supplier (External provider)	Tender documents/Purchase order/ Work Order/ Letter/ Email / Agreement	Concerned Process Owner
External Customer complaint / Feedback (ABMS related)	On receipt of the Feedback / Complaint (ABMS related)	All employees	Grievance Redressal Portal /Meeting	Vigilance Deptt.
Action taken against ABMS related customer complaints	Once action taken	Customer	Grievance Redressal Portal/Email/Letter	Vigilance Deptt.

CORPORATE OFFICE, NEW DELHI

S#	AUTHORITY	DIVISION / OFFICE	REPORTING TO
1	MD	Head Office	BOD
2	Director (Finance)	Finance, MIS, Internal Audit,	MD
3	Director (Personnel)	Personnel, Purchase, Publicity, Inspection, Technical	MD
4	Director (M&CP)	Commercial, Technical, ROs	MD
5	Chief Vigilance Officer	Vigilance	MD
6	Secretary	B&C, Corporation	Director (Finance)
7	Group General Manager (Finance)/HoD	Finance	Director (Finance)
8	Group General Manager (Personnel)/ HoD	Personnel, Purchase, Publicity	Director(Personnel)
9	Group General Manager (Commercial)/ HoD	Commercial	Director (M&CP)
10	Group General Manager (System)/ HoD	MIS	Director(Finance)
11	General Manager (Technical)/ HoD	Technical, Inspection, Quality System, PCS, R&D	Director(M&CP)
12	General Manager (NBP&P)/ HoD	New Business Projects & Planning Division	Director (M&CP)
13	General Manager (BDA & Marketing)/ HoD	Business Data Analytics & Marketing	Director (M&CP)
14	General Manager (Insp.)/ HoD	Inspection Division	Director (Personnel)
15	Chief Engineer (Engg.)/ HoD	Engineering, Planning	Director (M&CP)
16	Regional Manager	Head of Region	Top Management

NOTE: Communication matrix for Divisions, Regional offices, and Warehouses are available at respective places.



7.5 Documented Information:

For the control of documented information, CWC has established a system to address the following activities, as applicable:

- distribution, access, retrieval and use;
- storage and preservation, including preservation of legibility;
- control of changes (e.g. version control);
- retention and disposition.

Activity	System to control activities
Types of Documented Information	<p>The organization has established following documented information</p> <ul style="list-style-type: none"> ➤ ABMS Manual (ABMSM) ➤ ABMS Document (e.g. Risk Assessment, Context of the Organization, Vigilance Manual for Surprise Check, Staff Regulations) ➤ Formats (F) ➤ Procedure (P) ➤ Document (D)
Document Identification	<p>Identification of the ABMS documents are done through (a) Document Title (b) Document Number. Each document is having document title and unique identification number. Following method is applied for Document Numbering –</p> <p>1.Manual – ABMSM / CWC (type of Document / Organization)</p> <p>2.Other Documents –</p> <p>abbreviation of nature of documented information (X) / abbreviation of Management System (Y) / abbreviation of the document title (Z) / number (A)</p> <p>Example – Title: Context Mapping; Number: D/ABMS/CM 02 X = D stands for Document Y = ABMS stands for Anti Bribery Management System Z = CM Stands for Context Mapping A = serial number of the document</p> <p>3. Formats –</p> <p>abbreviation of nature of documented information (X) / abbreviation of Management System (Y) / abbreviation of the document title (Z) / number (A)</p> <p>Example – Title: Gift Record; Number: F/ABMS/GR 02 X = F stands for Format Y = ABMS stands for Anti Bribery Management System Z = GR Stands for Gift Record A = serial number of the document</p>



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Document Preparation	The preparation of documented information, against various requirements to demonstrate the management system compliance is done by the HODs
Document Review and Approval	MD reviews and approves Policy and ABMS Manual and Core Committee will review the ABMS documents/procedures/formats and CVO approves the same.
Document change control	While there is a need to change any documented information, the process owner proposes for such changes. Core Committee will propose amendment, if any. The proposed amendment related to ABMS documents is reviewed and approved by CVO. The Document Amendment History is updated, after making the change.
System to change any Documented Information	If there is a need to change any Documented Information related to IMS, the same is reviewed and approved by the HoD and change in documents related to ABMS is reviewed and approved by CVO. On receipt of the approval, necessary change is done. The amendment sheet along with modified Sheet [s] is to be circulated to all controlled copy holders. The old sheet [s] is to be declared OBSOLETE and the controlled copy holder is to destroy old sheet [s] and replace them with modified Sheet (s).
Document Identification and Traceability	(a) By assigning unique title to each document, the document identification is controlled; (b) Through filing system (hard copy and or soft copy), document traceability is controlled.
Control of Document Revision status	When any documented information is prepared and issued first time, the version number is allotted as 1.0. As soon as any change is made, the version status gets changed serially 2.0, 3.0 --- so on.
Control of Hard copy Documented information	Hard copy documented information are kept in the Filing Cabinet with proper identification and traceability.
Control of Soft copy documents	Soft copy documented information are maintained in the Computer (Desktop / Laptop). Back up is taken in the external hard disk (at least once in a week or as per requirement / importance). Soft copy documented information are maintained in respective Folders with proper Identification and Traceability.
Distribution of Documented Information	(a) The approved and updated Hard Copy Documented Information is distributed to the required Users, updating Document Distribution Record. (b) The approved, updated and 'Read Only PDF version' Soft Copy Documented Information is distributed to the Users through HRMS
Type of Documents	The original approved and updated set of documents is marked as "Master Copy" . The documented information which are used by various departments, are marked as "Controlled Copy" . The old documents are marked as "Obsolete Copy" (which may be retained for future reference purpose with clear identification as 'For Reference Only' or disposed of through shredding process).
Retention and Disposition	The documents are normally retained for 3 years or more depending on the management decision, to keep longer for reference purpose. They are disposed by crushing or breaking or deleting or by rewriting, after the retention period.



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Documented information of external origin determined by CWC to be necessary for the planning and operation of the anti-bribery management system shall be identified as appropriate, and controlled.

Cross Reference :

- Document/Procedure/Format related to ABMS [Annex-02]
- IMS Documents [Annex-03]



8.0 Operation

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8.Operation:

8.1 Operational planning and control:

The Vigilance Department of CWC is implementing Vigilance and ABMS processes through following Documented Information -

- Central Vigilance Commission (CVC) Manual
- Vigilance Manual for Surprise Check & Inspection
- CWC (Staff) Regulations, 1986
- CWC IMS Vigilance Documents

8.2 Due diligence:

CWC has established a system to assess the nature and extent of the bribery risk in relation to specific transactions, projects, activities, business associates and personnel falling within those categories. The assessment shall include any due diligence necessary to obtain sufficient information to assess the bribery risk. The due diligence shall be updated at a defined frequency, so that changes and new information can be properly taken into account

Cross Reference :

- Vigilance Manual for Surprise Check & Inspection
- Minutes of Review Meeting
[D/ABMS/MRM/02 dated 08.09.2020]
[D/ABMS/RMM/02 dated 08.09.2020]

8.3 Financial Controls:

CWC shall implement financial controls that manage bribery risk.

Cross Reference :

- Budget Estimate
- Vigilance Manual for Surprise Check & Inspection
- Delegation of Power

8.4 Non-financial controls:

CWC has established a system to implement non- financial controls that manage bribery risk with respect to such areas as procurement, operational, sales, commercial, human resources, legal and regulatory activities.

**Cross Reference :**

- Central Vigilance Commission (CVC) Manual
- Vigilance Manual for Surprise Check & Inspection
- Staff Regulation
- Minutes of Review Meeting

8.5 Implementation of anti-bribery controls by controlled organizations and by the business associates:

CWC has established a system (through the **Procedure on ABMS Management**) to upload the ABMS policy on the CWC website and also intimate all State Warehousing Corporations and CRWC about the ABMS policy. CWC shall provide awareness of ABMS and implementation of ABMS in CWC to all the business associates.

Cross Reference :

- IMS documents
- ABMS Policy
- Procedure on ABMS[P/ABMS/PR01 dated 08.09.2020]
- Model Tender Documents

8.6 Anti-bribery commitments:

For business associates which pose more than a low bribery risk, CWC shall implement procedures which require that, as far as practicable:

- a) business associates commit to preventing bribery by, on behalf of or for the benefit of the business associate in connection with the relevant transaction, project, activity, or relationship;
- b) CWC is able to terminate the relationship with the business associate in the event of bribery by, on behalf of, or for the benefit of the business associate in connection with the relevant transaction, project, activity, or relationship.

CWC controls these activities through the **Procedure on ABMS Management**.

Cross Reference :

- ABMS Policy
- Tender documents

8.7 Gifts, Hospitality, Donations and similar benefits:

CWC has established a system to follow the CWC (Staff) Regulations, 1986 for Gifts, hospitality etc. CWC also controls these activities through the **Procedure on ABMS Management**.

Cross Reference :

- Gift Register [F/ABMS/GR 02 dated 08.09.2020]



8.8 Managing inadequacy of Anti-Bribery Controls:

CWC has established a system to act on inadequacy found during due diligence, as per CWC (Staff) Regulations, 1986 and appropriate advisory shall be issued for compliance and continual improvement in system.

Cross Reference :

- CWC (Staff) Regulations, 1986

8.9 Raising Concerns:

CWC has established a system to address Grievance Redressal Portal for raising the concerns which are examined in Vigilance Division. Based on the fact and records, action as per CWC (Staff) Regulations, 1986/CVC Manual shall be taken. CWC also controls these activities through the **Procedure on ABMS Management**.

Cross Reference :

- Central Vigilance Commission (CVC) Manual
- CWC (Staff) Regulations 1986
- Grievance Redressal Portal

8.10 Investigating and dealing with Bribery:

CWC Top Management has established a system to appoint Investigation Officer to investigate the bribery related issues raised by anyone and after submission of written report by Investigation Officer, concerned Disciplinary Authority will take action against delinquent official, if any. CWC also controls these activities through the **Procedure on ABMS Management**.

Cross Reference :

- Central Vigilance Commission (CVC) Manual
- CWC (Staff) Regulations, 1986
- IMS Documents
- Delegation of Power



9.0 Performance Evaluation

Issue Number : 03

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9. Performance evaluation:

9.1 Monitoring measurement, analysis and evaluation:

CVO shall conduct a meeting with Top Management and discuss the issues related to systemic improvement. CVO is also conducting a bimonthly meeting to expedite the matter pertaining to Vigilance as well as bribe.

Cross Reference :

- Minutes of Monthly Vigilance Review Meeting (conducted among CVO & all Officers of Vigilance Deptt.)
- Minutes of Bi-Monthly Vigilance Review Meeting (conducted by Top Management and CVO)

9.2 Internal audit:

CWC has established following procedure to conduct Internal Audit :

Objective of the Activity	System to control activities
Frequency of ABMS Internal Audit	Once in a year
Internal Audit Plan	Internal audit Plan is made for the whole year. Considering the frequency of the Internal Audit. The ABMS – Audit plan is developed based on: <ul style="list-style-type: none"> ➤ Status of previous audits ➤ Significant areas ➤ The criteria for ABMS audit program includes the results of risk assessments of the organization's activities, and the results of previous audits ➤ Frequent customer complaints ➤ Serious internal non-conformances ➤ External audit findings
Internal Audit Schedule	For each internal audit, specific Internal Audit Schedule is prepared (covering date and time of the audit, Auditor's and Auditee's names and departments) to ensure un-biased audit approach, internal audit is conducted cross-functionally.
How the Internal Audit is conducted	Internal Audit is conducted by the trained and competent Internal Auditors, as per the Internal Audit Schedule, with the help of Audit Checklist. CWC shall ensure that no auditor is auditing his or her own area of work.
Audit Checklist	The Internal Auditor prepares the Internal audit Checklist, based on the audit scope and the audit criteria so that internal audit can be conducted effectively.

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<p>Audit Observation</p>	<p>(a) During the internal audit if any Non-Conformance (NC) is identified, the details of such NC is raised through Internal Audit NC Report.</p> <p>(b) During the internal audit if any potential NC / Opportunity for Improvement (OFI) is identified, the same is reported for taking necessary Corrective and / or Risk Management Actions.</p>
<p>Actions against the Audit Observation</p>	<p>Necessary actions (correction, root cause analysis and corrective action) are taken by the Auditee. Wherever possible, post corrective action, Risk Management Actions are also taken and recorded.</p>
<p>Review of Actions</p>	<p>(a) The details of NC and / or OFI are reviewed during the Management Review Meeting.</p> <p>(b) During the next internal audit, effectiveness of the actions taken against the NC/OFI raised during the last audit is reviewed.</p>



Cross Reference :

- Internal Audit check list [D/ABMS/CL/02 dated 08.09.2020]
- NC Report [F/ABMS/IA/02 dated 08.09.2020]

9.3 Management review:

9.3.1 Top management review:

CWC has established a system to review the organization's anti-bribery management system at least once in a year [MRM Meeting between Top Management consisting of MD, Director (M&CP), Director (Pers.), Director (Fin.) and CVO] to ensure its continuing suitability, adequacy and effectiveness. There shall be a quorum of at least three members. CVO shall be the representative of ABMS. The outputs of the top management review include decisions related to continual improvement opportunities and any need for changes to the anti-bribery management system. A summary of the results of the top management review shall be reported to the governing body. CWC has established a system to retain documented information as evidence of the results of top management reviews.

Cross Reference :

- Management Review Meeting



9.3.2 Governing body review:

The governing body has established a system to undertake periodic reviews (at least once in a year) of the anti-bribery management system based on information provided by top management and the anti-bribery compliance function and any other information that the governing body requests or obtains. There shall be a quorum of at least 05 members. Secretary, CWC shall be the representative of ABMS. The organization shall retain summary documented information as evidence of the results of governing body reviews.

Cross Reference :

- Minutes of Board of Directors Meeting



9.3.3 Review by anti-bribery compliance function:

The anti-bribery compliance function shall report at least once in a year to top management, or to a suitable committee of the governing body or top management, on the adequacy and implementation of the anti-bribery management system, including the results of investigations and audits. All the Division Heads of CWC shall be member of Anti-Bribery Compliance function headed by CVO. Quorum of meeting shall be at least 05 members.

Cross Reference :

- Minutes of compliance function

9.3.4 Regional Office review:

CWC has established a system to review the Anti bribery Management system at Regional office level at least once in a year. Regional Manager will chair the meeting. All the HoDs of each Division i.e. Admin & Establishment, Business, Finance & Accounts, Technical, Inspection, NBP&P, BDA&M and Engineering Division will attend the meeting. There shall be a quorum of at least four members. Vigilance Coordinator should be the representative of ABMS. A Summary of the results of the Regional Office review should be reported to the Management representative at Corporate Office.

Cross Reference :

- Regional office Management Review Meeting



10.0 Improvement

Issue Number : 03

Revision Number : 03

Date : 24/08/2023

10 Improvement:

10.1 Nonconformity and corrective action:

Activity	System to control activities
Sources of ABMS related NC	<p>A Non-Conformance (NC), which is considered as non-fulfilment of any requirement, can be identified through following sources</p> <ol style="list-style-type: none"> Internal or external audits. Customer or interested parties complaints. Inspections. Employees suggestions/ Participation Accidents or emergencies. Consultation with employees Legal notices. Evaluation of compliance to legal & other requirements <p>Once the Non-Conformance (NC) is reported, the same is recorded in the NC & CA Form.</p>
How Correction is taken	<p>If the NC is found justified, immediate action is taken to resolve the problem. If the NC is found non-justified, proper justification is given to the interested party who has reported the NC/Complaint. NC & CA Form is updated.</p> <p>In case of Non-conforming Products - To take up with suppliers and ask for replacement or compensation.</p> <p>In case of Non-conforming Services – To ask service providers to redo or rectify the nonconformities and recheck and OK or reject the work.</p>
How Root Cause is analyzed	<p>Further to the immediate action to resolve the NC, thorough root cause identification is done. NC & CA Form is updated.</p>
How Corrective Action is taken	<p>Based on the root cause identification, corrective action is taken to eliminate the cause of the Non Conformance. NC & CA Form is updated.</p>
How review of effectiveness of the actions (Correction, Root Cause analysis and Corrective action & Preventive action) is done	<p>The effectiveness of the actions (Correction, Root Cause analysis, Corrective & Risk Management Action) is reviewed within the defined timeframe to understand to what extent the identified NC has been mitigated and/or eliminated. NC & CA Form is updated.</p> <p>The impact of the (a) Correction (b) Root Cause Analysis and (c) Corrective Action (d) Effectiveness of the Corrective Action (e) Risk Management Action are reviewed during the Management Review meeting and Risk Assessment (which are conducted at least 6-monthly interval). Minutes of Meeting is updated.</p>
Communication	<p>The status of actions (Correction, Root Cause analysis, Corrective and Risk Management action) are communicated to the interested party, ensuring their satisfaction.</p>

Cross Reference :

- Non Conformance & Corrective Action Report[F/ABMS/NC&CA-02 dated 08.09.2020]



10.2 Continual improvement:

CWC shall continually improve the suitability, inadequacy and effectiveness of the anti-bribery management system.

Cross Reference :

- Advisories of Vigilance Division



CENTRAL WAREHOUSING CORPORATION
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Index of ABMS Documents

S#	Doc.No.	Title	Issue No.	Revision No. & Date	No.of Pages
1	P/ABMS/PR 01	Procedure for ABMS Management	01	01&08.09.2020	6
2	D/ABMS/CM 02	Context Mapping	01	02 &08.09.2020	3
3	D/ABMS/N&E 02	Need and Expectations	01	02 &08.09.2020	3
4	F/ABMS/GR 02	Gift Format	01	02 &08.09.2020	2
5	D/ABMS/OB 04	Objectives	02	04&24.08.2023	2
6	D/ABMS/RM 02	Risk Methodology	01	02 &08.09.2020	2
7	F/ABMS/Risk 02	Risk assessment	01	02 &08.09.2020	2
8	D/ABMS/SM 02	Skill Matrix	01	02 &08.09.2020	2
9	D/ABMS/RR 02	Job roles and responsibilities	01	02 &08.09.2020	16
10	D/ABMS/CL 02	Internal Audit Checklist	01	02 &08.09.2020	4
11	F/ABMS/IA 02	Non Conformities Report	01	02 &08.09.2020	2
12	F/ABMS/NC&CA 02	Non conformity Corrective action report	01	02 &08.09.2020	2
13	F/ABMS/MRM 02	Management Review meeting	01	02 &08.09.2020	4
14	F/ABMS/RMRM 02	Regional Management Review meeting	01	02 &08.09.2020	4

Prepared By Sh. Divyendu Rawat, Manager (Vig.)	Reviewed by Sh. Alok Kumar Singh, DGM(Vig.)	Approved by Sh. Amit Kumar Singh, Managing Director	Revision No:04 Date:24.08.2023
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Document Title: ABMS Objectives
Document Number: D/ABMS/OB 04

Prepared By

Name	Designation	Signature
Sh. Divyendu Rawat	Manager(Vig)	

Reviewed by

Name	Designation	Signature
Sh. Alok Kumar Singh	DGM(Vig)	

Approved by

Name	Designation	Signature
Sh. Amit Kumar Singh	Managing Director	

Distribution

All CWC Employees Through HRMS

Prepared By: Sh. Divyendu Rawat, Manager (Vig.)	Reviewed by: Sh. Alok Kumar Singh, DGM(Vig.)	Approved by: Sh. Amit Kumar Singh, MD, CWC	Revision No: 04 Date: 24.08.2023
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OBJECTIVES FOR THE YEAR 2023-24

D/ABMS/OB 04

S#	Objective	Target	Action Plan	Responsibility	Target Time
1					
2					
3					
4					

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Prepared By: Sh. Divyendu Rawat, Manager (Vig.)	Reviewed by: Sh. Alok Kumar Singh, DGM(Vig.)	Approved by: Sh. Amit Kumar Singh, MD	Revision No: 04 Date: 24.08.2023
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