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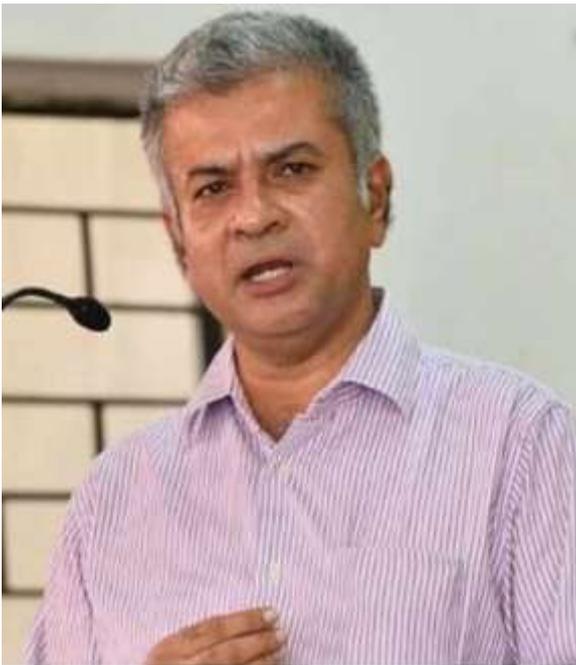
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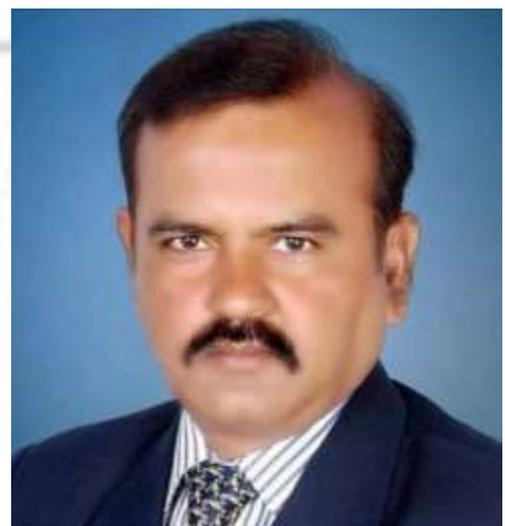


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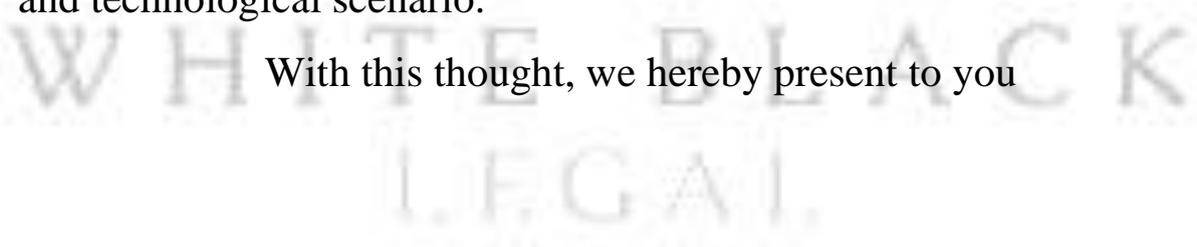
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WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal provided dedicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you



JEOPARDISE OF SUSTAINABLE DEVELOPMENT WITH SPECIAL REFERENCE TO CORRUPTION – A CRITICAL ANALYSIS

AUTHORED BY - TAMILSELVI G* & NAGARJUN G T**

ABSTRACT

Corruption is one of the biggest threats to the economic growth of the states in the world. The bureaucrats, politicians, and industrialists are involved in corruption for their gain, creating irreparable losses for the states. Especially, the developing states struggle to eradicate poverty. Due to corruption, the government poses one of the greatest threats to economic growth worldwide. Bureaucrats, politicians, and industrialists often engage in corrupt practices for their gain, resulting in significant harm to their countries. This is especially problematic for developing nations, which struggle to eradicate poverty. Corruption makes it difficult for governments to rebuild and rehabilitate their societies effectively. It faces difficulties in reconstructing and rehabilitating their societies¹. In this circumstance, the United Nations organised the Monterrey International Conference on Financing for Development and the Johannesburg World Summit on Sustainable Development to curb corruption and raise awareness of the impact of corruption on the development of the states². After a long negotiation, the United Nations came up with a new instrument known as the "United Nations Convention Against Corruption" to address the issue of corruption at the global level³. This paper critically analyses how corruption jeopardises the sustainable development of the states and the implementation of the United Nations Convention Against Corruption in the member states.

Keywords: Corruption, Sustainable Development and Jeopardize

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¹ https://www.unodc.org/unodc/en/corruption/tools_and_publications/UN-convention-against_corruption.html.
(last visited Mar 10, 2020)

² Ibid.

³ Ibid.

INTRODUCTION

The World Bank defined corruption as “abuse of public or corporate office for private gains”⁴. The corruption can occur at various levels of the government.⁵ Corruption can be classified into different types viz., Grand Corruption⁶, Political Corruption⁷, Corporate Corruption⁸, Administrative Corruption⁹, Petty Corruption¹⁰ and Systematic Corruption¹¹. The Grand, Political and Administrative Corruptions play a vital role in the government system which affects the sustainable development of the state. So, the developing nations started to impose more taxes on common people to handle the losses due to corruption. Later, in the year 2000, the United Nations organised the Monterrey International Conference on Financing for Development and the Johannesburg World Summit on Sustainable Development to express the views of the member countries on corruption.¹²

Research Questions

The following research questions have been framed to analyse this research topic:

What specific measures have been implemented by countries that are party to the United Nations Convention Against Corruption to combat corruption effectively?

How can developing nations balance the need for tax revenue with the economic burdens placed on their citizens due to corruption?

What role does public awareness and education play in mitigating the impact of corruption on sustainable development?

Methodology

The doctrinal and secondary materials are used for this research paper, and also analysed various reports filed by the CAG.

⁴ Corruption.pdf, <http://siteresources.worldbank.org/EXTABOUTUS/Resources/Corruption.pdf> (last visited Mar 11, 2020).

⁵ Ibid.

⁶ The corruption committed by heads of state, ministers or senior government officials for the personal gain of business people, politicians and Criminal elements, *ibid.*, at page no. 1

⁷ The corruption committed by lawmakers, monarchs, dictators and legislators for their own political or personal benefits, *ibid.*

⁸ The corruption occurs between Private business corporations and their suppliers for their private gains, *ibid.*

⁹ The use of bribery and favouritism to allow individuals or businesses to evade taxes, and regulations or win the tenders or contracts, *ibid.*, at page no. 2.

¹⁰ The payment of small amounts of money to facilitate routine official transactions, *ibid.*

¹¹ Corruption is prevalent throughout all levels of society, *ibid.*

¹² *Supra*, footnote 1.

INTERNATIONAL INSTRUMENT ON CORRUPTION

The UN adopted the United Nations Convention against Corruption in 2003. The main purpose of this convention is to combat corruption, international cooperation in the prevention of corruption and the proper management of public affairs and Public Property¹³. The Convention applies to the offences that damage or harm the State Property.¹⁴ It also protects the sovereignty of the parties¹⁵. The state parties should create an effective legal system for the effective implementation of the anti-corruption policy.¹⁶ The Code of Conduct is to be created for public officials to curb corruption activities.¹⁷ The independence of the judiciary should be ensured and at the same time, corruption should be controlled in the judiciary without affecting the independence of the judiciary.¹⁸ The auditing standards are to be maintained in the private sector to prevent corruption.¹⁹ Civil society, Non-Governmental organisations, and community-based organisations are involved in the creation of awareness of corruption in society.²⁰ The supervisory regime for the banks and non-financial institutions for the transmission of money is to be regulated as a measure to prevent money laundering.²¹ These are the wide range of acts of corruption and preventive policies. India is a signatory to the United Nations Convention Against Corruption since 2005.

Corruption in India

Corruption affects the sustainable growth of the state. On 11th February 2025, Transparency International released a report on Corruption Perception Index for 2024, As per the said report, India ranked 96 out of 180 countries as its overall score dropped a point to 38.²² Another survey released by FICCI stated the findings mention that around 83% of the respondents felt that cases of bribery and corruption can impact the FDI inflows.²³ Corruption in the country continues to loom large and tears into the fabric of governance. There is corruption in all spheres and common people are adversely affected in their day-to-day

¹³ Article 1 of the United Nations Convention Against Corruption

¹⁴ Article 3 of the United Nations Convention Against Corruption

¹⁵ Article 4 of the United Nations Convention Against Corruption

¹⁶ Article 5 of the United Nations Convention Against Corruption

¹⁷ Article 8 of the United Nations Convention Against Corruption

¹⁸ Article 11 of the United Nations Convention Against Corruption

¹⁹ Article 12 of the United Nations Convention Against Corruption

²⁰ Article 13 of the United Nations Convention Against Corruption

²¹ Article 14 of the United Nations Convention Against Corruption

²² <https://www.thehindu.com/news/national/india-ranks-96-out-of-180-countries-in-corruption-perceptions-index-2024/article69213911.ece>

²³ <https://ficci.in/public/storage/SEDocument/20254/FICCI-EY-Report-Bribery-corruption.pdf>

existence.²⁴

A member of the provisional parliament, in the first of the events immediately after Independence, H.C. Mudgal, on behalf of the Bombay Bullion Association in Parliament on a payment of Rs. 20,000, was accused of agreeing to canvas support and rendering propaganda. The accusation was refuted by Mudgal. A Parliament Committee under the chairmanship of T.T. Krishnamachari was named to investigate the allegations²⁵. In Independent India, this was the first financial scandal involving an amount of around Rs. 216 crores (about \$ 500 million at the exchange rate at the time), as the country was the first High Commissioner to the UK. Krishna Menon, on behalf of the government, signed an unfulfilled but entirely paid-up deal. Mr. Menon has purportedly placed an order for these jeeps from a foreign company without following the due procedure. These jeeps were to be utilised in Hyderabad and Kashmir in turbulent areas. The first incident included the procurement of 200 jeeps for which a complete payment of 80 lakh was made, but only 155 jeeps were produced. Of 45 jeeps, for which about 20 lakh had been paying, the government was robbed. The reluctance of Menon to face an investigation triggered a public outcry. However, despite this, no action was taken against Menon, who subsequently became Minister of Defence of India in the Cabinet of Nehru. The Mundhra Agreement introduced crucial issues relating to the extent of the powers of independent credit agencies, the position of civil servants and, above all, Parliament's ministerial duty. In 1977, the acquisition of the weakening shares of the Mundhra Companies by the nationalised Life Insurance Company drew substantial critical public interest. A Commission of Inquiry, led by Chief Justice M.C. Chagla of the Bombay High Court, was asked to investigate the question posed by Feroze Gandhi, a member of parliament. Chagla maintained the theory of Ministerial accountability and indicted H.M. for the lapses on the part of the then Minister of Finance, T.T. Krishnamachari. Patel, the Chief Secretary, and the President of the LIC. All three had to withdraw from their respective jobs as a result of the enquiry. In 1963, after Justice S.R. was assigned to investigate the charges of corruption and nepotism etc. against a politician, an Investigation Committee was first appointed. Das was ordered to probe the allegations against Sardar Partap Singh Kairon, then the Chief Minister of Punjab. As a result of the Commission's conclusions, Kairon had to quit his position as Head of Ministership. On 4 May 1971, Ved Prakash Malhotra, Chief Cashier of the State Bank of

²⁴ *ibid*

²⁵

<https://timesofindia.indiatimes.com/india/how-an-mp-was-expelled-for-similar-scandal/articleshow/1331144.cms>

India, received a phone call allegedly from the office of the Prime Minister, asking him to make available from the bank an amount of Rs. 60 lakhs (six million) needed for a top-secret mission in Bangladesh. After a delay, Mrs Indira Gandhi's voice came on the line to direct Malhotra to hand over the number to someone with a code word who would address him. Rustom Sohrab Nagarwala was the person who asked Malhotra to drive straight to the house of the Prime Minister and receive a voucher for the number. India signed a Rs 1,437-crore deal on 18 March 1986 with Swedish arms manufacturer AB Bofors to supply the army with 400 155 mm Howitzer guns. A year later, a Swedish radio station reported on 16 April 1987 that the company had bribed top Indian officials and security personnel to win the contract. The conflict rattled the Rajiv Gandhi-led government in the late 1980s. A Commission composed of two justices of the Supreme Court, Justice MP. Thakkar with Justice S. Natarajan. In April 1987, they began investigating the Fairfax affair. It investigated the agreements entered into with Fairfax Group Inc., an American detective firm, to investigate violations of FERA (Foreign Trade Control Act) and in their report implicated the former finance minister, V.P. Singh. Mr. V.P. Singh later became India's Prime Minister in 1989. A former Lok Sabha (Lower House of the Indian Parliament) speaker, Balram Jakhar, was accused of supporting the interests of Mr Brady*, a foreign acquaintance, by waiving import duties in exchange for 50 machines processing fodder. The outfit of Mr. Jakhar, the Bharat Krishak Samaj (Indian Agriculturist Society), reportedly played a questionable role in a transaction that relieved the Indian people of taxes of Rs. 36 million and foreign exchange of over Rs. 35 million. While the case is still ongoing, no action will probably take place. Jakhar was the Minister of Agriculture in Narasimha Rao's Cabinet. Under a contract signed in 1981, the Government of India purchased two submarines from a West German firm. Under the terms of an open-ended deal, a seven per cent fee, which turned out to be Rs. 3,000 million, was paid to HDW's Indian agents. Nobody interested in the book has been brought in. The Federal Bureau of Investigation in April 1990 - A lawsuit was lodged against the senior officials of the Ministry of Civil Aviation and Indian Airlines for the hasty procurement of aircraft A-32.0. Bribery and incompetence in negotiating the purchase amounting to Rs. 25,000 million were paid to the officers. Nothing came out of this programme, however.

This is the latest scandal that rocked the nation and the government. It was during the early 1990's, that P.V. Narasimha Rao took over as the prime minister after the assassination of Rajiv Gandhi. The amount involved is Rs. 55000 million; 80 times more than in Bofors. The year 1992 maintains a curious position in India's history of scams. The planet saw the ingenious

machining of stock markets for the first time that year. The 'Securities Scam,' as it has been known, involving fraud of Rs. 4,000 crore, is now one of the biggest frauds to date on the Indian stock market. It was a systemic scam involving bank receipts and stamp records that eventually resulted in the stock market collapsing. The scam rocked the country and finally modified the rules of the Dalal Lane game (Das, October 20, 2020). Huge crowds stilled the 2G scam court hearings earlier today, a deception that rocked the nation and was ranked by Time magazine as the second-largest misuse of executive authority in the country. After a short delay, however, the court declared that both defendants had been acquitted in the 2G scam case. According to the CAG report, all the demand proposals were already backdated, suggesting that telecommunications companies had advance knowledge of the licences to be given. Coalgate snowballed into a huge political scandal that pulled top leaders and bureaucrats from the previous UPA regime into the probe, as it was popularly known.

The Coal Allocation or Coalgate fraud is a controversy that happened during the tenure of the UPA government. Since the then Comptroller and Auditor General (CAG) levied charges against the government for allocating coal blocks to public and private companies, it came into a reckoning in 2012. Out of the estimated 216 coal blocks allotted from 1993-2010, 194 were sold for captive use by these public and private undertakings. These are the various scams and corruption activities that affected the economy of the country as mentioned in the CAG Report.

Safeguards through Legislation Related to Anti-Corruption in India

Corruption can be penalised in various laws like the Indian Penal Code, 1860/Bhartiya Nyaya Sanhita, 2023 and the Prevention of Corruption Act, 1988. The Benami Transactions (Prohibition) Act, of 1988 prohibits Benami transactions. The Prevention of Money Laundering Act, of 2002 penalises public servants for the offence of money laundering.

Indian Penal Code, 1860/Bharatiya Nyaya Sanhita, 2023:

The IPC defines "public servant" as a government employee, officer in the military, navy or air force; police, judges, officers of the Court of Justice, and any local authority established by a central or state Act. A public servant unlawfully buying or bidding for property. The public servant shall be punished with imprisonment of up to two years or with a fine or both. If the property is purchased, it shall be confiscated²⁶.

²⁶ Section 169 of IPC/203 of BNS Act, 2023

The criminal breach of trust by a public servant. The public servant shall be punished with life imprisonment or with imprisonment of up to 10 years and a fine²⁷.

The Prevention of Corruption Act, 1988:

In addition to the categories included in the IPC, the definition of “public servant” includes office bearers of cooperative societies receiving financial aid from the government, employees of universities, Public Service Commission and banks.

If a public servant takes gratification other than his legal remuneration in respect of an official act or to influence public servants is liable to a minimum punishment of six months and a maximum punishment of five years and a fine. The Act also penalizes a public servant for taking gratification to influence the public by illegal means and for exercising his influence with a public servant.

If a public servant accepts a valuable thing without paying for it or paying inadequately from a person with whom he is involved in a business transaction in his official capacity, he shall be penalized with minimum punishment of six months and a maximum punishment of five years and fine. It is necessary to obtain prior sanction from the central or state government in order to prosecute a public servant. The Prevention of Corruption Act 1988 is the law governing bribery and corruption in India. It extends to the whole of the country, except in Jammu and Kashmir. And it is only applicable to public servants.

Every State has a Criminal Investigation Department (CID) for either investigating or taking over control of sensitive/special report cases registered at a police station, anywhere within the jurisdiction of the State. The Economic Offences Wing (EOW) may be a part of the State CID or a separate wing altogether. Besides this, every State has a separate Vigilance department for investigation of bribery and corruption cases against public servants. The apex/premier investigation agency at the centre is the Central Bureau of Investigation (CBI). The CBI is a nodal agency for coordinating with other central vigilance departments on vigilance matters. CBI has an Anti Corruption Division to deal with cases of corruption and fraud committed by public servants of all Central Government Departments, Central Public Sector Undertakings and Central Financial Institutions.

²⁷ Section 409 of IPC/316 (5) of BNS Act, 2023

Central Vigilance Commission (CVC): It's an autonomous body and is free of control from any executive authority. They are charged with the power of monitoring all vigilance activity under the Central Government of India and advising various authorities in central Government organizations in planning, executing, reviewing and reforming their vigilance work. They coordinate with the various vigilance departments involved in the public sector and also supervise CBI's work.

The Benami Transactions (Prohibition) Act, 1988

The Act prohibits any benami transaction (purchase of property in the false name of another person who does not pay for the property) except when a person purchases property in his wife's or unmarried daughter's name. Any person who enters into a benami transaction shall be punished with imprisonment of up to three years and/or a fine. All properties that are held to be benami can be acquired by a prescribed authority and no money shall be paid for such acquisition.

The Prevention of Money Laundering Act, 2002

The Act states that an offence of money laundering has been committed if a person is a party to any process connected with the proceeds of crime and projects such proceeds as untainted property. "Proceeds of crime" means any property obtained by a person as a result of criminal activity related to certain offences listed in the schedule of the Act. A person can be charged with the offence of money laundering only if he has been charged with committing a scheduled offence. The penalty for committing the offence of money laundering is rigorous imprisonment for three to seven years and a fine of up to Rs 5 lakh. If a person is convicted of an offence under the Narcotic Drugs and Psychotropic Substances Act, 1985, the term of imprisonment can extend up to 10 years.

The Adjudicating Authority, appointed by the central government, shall decide whether any of the property attached or seized is involved in money laundering. An Appellate Tribunal shall hear appeals against the orders of the Adjudicating Authority and any other authority under the Act. Every banking company, financial institution and intermediary shall maintain a record of all transactions of a specified nature and value, verify and maintain records of all its customers, and furnish such information to the specified authorities.

Process followed to investigate and prosecute corrupt public servants.

The three main authorities involved in inquiring, investigating and prosecuting corruption cases are the Central Vigilance Commission (CVC), the Central Bureau of Investigation (CBI) and the state Anti-Corruption Bureau (ACB). Cases related to money laundering by public servants are investigated and prosecuted by the Directorate of Enforcement and the Financial Intelligence Unit, which are under the Ministry of Finance. The CBI and state ACBs investigate cases related to corruption under the Prevention of Corruption Act, 1988 and the Indian Penal Code, 1860. The CBI's jurisdiction is the central government and Union Territories while the state ACBs investigate cases within the states. States can refer cases to the CBI. The CVC is a statutory body that supervises corruption cases in government departments. The CBI is under its supervision. The CVC can refer cases either to the Central Vigilance Officer (CVO) in each department or to the CBI. The CVC or the CVO recommends the action to be taken against a public servant, but the decision to take any disciplinary action against a civil servant rests on the department authority. Prosecution can be initiated by an investigating agency only after it has the prior sanction of the central or state government. Government-appointed prosecutors undertake the prosecution proceedings in the courts. All cases under the Prevention of Corruption Act, of 1988, are tried by Special Judges who are appointed by the central or state government.

Strengthening Anti-Graft Laws

At present, there are no legal provisions to check graft in the private sector in India. The government has proposed amendments to existing acts and certain new bills for checking corruption in the private sector. Big-ticket corruption is mainly witnessed in the operations of large commercial or corporate entities. To prevent bribery on the supply side, it is proposed that key managerial personnel of companies and also the company shall be held liable for offering bribes to gain undue benefits & The Prevention of Money Laundering Act, 2002 provides that the properties of corrupt public servants shall be confiscated. However, the Government is considering incorporating provisions for confiscation or forfeiture of the property of corrupt public servants in the Prevention of Corruption Act, 1988 to make it more self-contained and comprehensive. A committee headed by the Chairman of the Central Board of Direct Taxes (CBDT), has been constituted to examine ways to strengthen laws to curb the generation of black money in India, its illegal transfer abroad and its recovery.

Conclusion

In the CAG report, concerns were raised about unreasonable managerial decisions when allocating the coal blocks and not observing the relevant competitive bidding protocol. A report by the Comptroller and Auditor General of India revealed that the allocation of coal blocks between 2004 and 2009 was inefficient and possibly illegal. It assumed the loss to the exchequer at the rate of Rs 10.7 lakh crore, but in the final report it later toned this amount down to Rs 1.86 lakh crore. These kinds of corruption jeopardised the growth of the country. It is the responsibility of the state to strengthen the laws related to corruption and effectively implement them to curb corruption in the nation.

