



CORPORATE CRIMINAL LIABILITY: ANALYSIS WITH RESPECT TO INDIAN PENAL LAWS

Erathi Anudeep, LLM (Corporate and Commercial Law), Christ University, Bengaluru, India

Abstract: Corporate criminal liability has become a significant area of concern in India, where the rapid growth of the corporate sector has been accompanied by an increasing number of corporate malfeasance cases. This research paper offers a comprehensive analysis of corporate criminal liability in India, examining its legal framework, practical implications, and the challenges associated with its implementation. It goes into the historical context and evolution of corporate criminal liability in India, highlighting key legislative developments and landmark judicial decisions that have shaped its current landscape. It explores the underlying principles of corporate criminal liability, discussing the theories and justifications that underpin this legal concept. The research delves into the statutory provisions that govern corporate criminal liability in India, with a particular focus on the Companies Act, 2013, and other relevant laws. It investigates the types of corporate offenses that trigger criminal liability, emphasizing their impact on the corporate sector and society as a whole.

KEYWORDS

Corporate Criminal Liability, Companies Act, Corporate Fraud, Corporate Governance

INTRODUCTION

Within the contemporary corporate world, businesses possess significant power and influence that affects not just the state of the economy but also the welfare of society. But this authority also carries a greater responsibility, therefore it's critical to hold corporations accountable for their wrongdoings. A legal concept known as corporate criminal liability (CCL) deals with a company's criminal responsibility for actions taken by its officers, employees, or agents while performing their corporate tasks. In the modern Indian legal system, knowing the subtleties of CCL is essential since it promotes moral business practices, protects the interests of the public, and upholds the rule of law.

In recent decades, India, one of the largest and fastest-growing economies in the world, has seen a substantial growth and alteration of the business landscape. Opportunities and concerns, particularly with regard to corporate wrongdoing, have come with this rise. Corporate companies are capable of committing a variety of crimes, such as fraud, environmental infractions, violations of product safety regulations, and more. Consequently, it is extremely important to look at corporate criminal responsibility in the framework of Indian law. It is crucial for companies, solicitors, and legislators to understand the complex interactions between business entities and the law in this day of increased scrutiny. The legal framework in place to hold businesses

accountable for their deeds will be clarified by this analysis of corporate criminal responsibility under Indian law, assuring that justice is done and public confidence in the corporate sector is upheld. Recent years have seen major changes to the Indian legal system regarding corporate criminal liability, or CCL, in terms of both legislative and judicial interpretation. The legal system in India has acknowledged the necessity of making sure companies are held responsible for their deeds, particularly when those deeds lead to criminal misbehavior. This acknowledgment is based on the knowledge that companies are artificial entities that act through their agents and that their activities may have significant effects on the environment, the economy, and society.

The Companies Act, 2013, which establishes the legal foundation for the formation, management, and dissolution of businesses, is the main law controlling CCL in India. Additionally, this legislation has provisions that hold businesses accountable for a range of crimes, including fraud, making false claims, and failing to comply with financial reporting regulations. These clauses are essential for keeping businesses accountable for their deeds and making sure they behave in a way that serves the interests of the general public as well as their shareholders.

Moreover, Indian court rulings have been crucial in determining the structure of CCL. Famous examples like the Volkswagen emission crisis and the Satyam scam have compelled judges to consider whether it is appropriate to hold companies criminally accountable for the deeds of its leaders and workers. The attribution, mens rea, and corporate purpose concepts—all crucial in assessing corporate criminal liability—have come under closer scrutiny as a result of these instances. Finding the right harmony among punishment and reform is one of the major issues facing CCL. Encouraging compliance and moral behavior is just as crucial as holding companies accountable for their wrongdoings. A large number of Indian businesses have put strong codes of conduct and compliance programmes in place to stop illegal activity within their enterprises.

LITERATURE REVIEW

¹Aishwarya Pandey, *Corporate Crime and Penal Policy in India: An Analytical Study*,

The article provides a comprehensive analysis of corporate crime and penal policy in India. The author highlights the need for a more proactive approach to address corporate crime, which includes preventive measures, effective enforcement, and a more proactive judiciary. The article also provides an overview of the primary legislations governing corporate crime in India, including the Companies Act 2013, the Prevention of Money Laundering Act, 2002, and the Securities and Exchange Board of India Act, 1992. The author points up a number of issues with India's penal code and corporate crime. The author mentions the absence of preventive actions as one of the main issues. The author recommends that instead of waiting for a crime to occur and then responding to it, businesses should take a proactive approach to avoid corporate crime. The author emphasizes the value of internal controls, good company governance, and ethical business practices in preventing corporate crime.

²Pradeep Kumar Singh, *Corporate Criminal Liability in India*

The topic of corporate crime, which is a particular type of socioeconomic crime committed by corporate entities, is covered in this article. The author points out that because corporate organizations are more organized and employ qualified and experienced people, it is more challenging to recognize and deter criminal activity. Since only natural individuals possess the body and intellect required for crime commission, committal for trial, and imposition of punishment, only they are subject to criminal culpability. The 21st century's social wellbeing is, however, seriously threatened by this idea of criminal culpability. The article also emphasizes how difficult it is to establish the criminal intent of companies because they lack a mind or body. The author

¹ Aishwarya Pandey, *Corporate Crime and Penal Policy in India: An Analytical Study*, *International Journal of Law Management & Humanities*. 605-619 (2021).

² Pradeep Kumar Singh, *Corporate Criminal Liability in India*, Volume 8, Issue 1, *Athens Journal of Law*, – Pages 31-48, January 2022

advises concentrating on the actions of certain actors within the corporation to establish criminal intent. The article also stresses the need to foster a culture of compliance within businesses and make sure that staff members are conscious of the moral and legal ramifications of their decisions.

³Kunal Kaushik Kally, *A Critical Study on Corporate Criminal Liability with Special Reference to US and Indian Laws*

The main issues regarding corporate criminal liability are examined in this article, with an emphasis on Indian and American laws and regulations. An introduction to the idea of corporate criminal culpability and the legal framework governing it is given in the opening paragraphs of the article. The difficulties in assigning criminal culpability to a corporation, the possible effects of corporate criminality on the economy, and the need for efficient enforcement tools will all be covered in the section that follows. The review will wrap up by highlighting the research's significance for policymakers and practitioners and summarizing its major results. This article uses a variety of primary and secondary sources, such as scholarly publications, official records, and court decisions. The Companies Act of 2013 in India and the Federal Sentencing Guidelines for Organisations in the United States are the key pieces of legislation cited in the article. These laws are crucial to comprehending the problems associated with this subject because they offer the basis for corporation criminal culpability in their various jurisdictions.

RESEARCH OBJECTIVE:

The principal aim of this study is to conduct a thorough examination of corporate criminal liability (CCL) in the framework of Indian legislation. The research will concentrate on comprehending the legal mechanisms, their pragmatic consequences, and the wider influence on corporate governance, business ethics, and public welfare. The purpose of this research is to further our understanding of how India deals with corporate wrongdoing, encourages responsibility, and strikes a balance between economic expansion and the protection of public interests.

RESEARCH QUESTIONS:

- What are the key statutory provisions and legal frameworks governing corporate criminal liability in India, and how have they evolved over time?
- How do Indian courts interpret and apply the principles of attribution, mens rea, and corporate intent in cases of corporate criminal liability?
- What are the notable landmark cases that have shaped the jurisprudence of corporate criminal liability in India, and what lessons can be drawn from them?
- What are the practical implications of corporate criminal liability on Indian businesses, including compliance programs, codes of conduct, and ethical practices?

METHODOLOGY

The methodology adopted in this research is doctrinal and descriptive in nature. The research is based upon sources of information like primary and secondary sources. The primary source of information and observations such as legislations, statutes, rules and regulations abstracts. Secondary sources are textbooks, commentaries on statutes, journals, websites and other internet resources that have been used for conducting this research.

³ Kunal Kaushik Kally, *A Critical Study on Corporate Criminal Liability with Special Reference to US and Indian Laws*, vol 6, SSRN, (January 23, 2020).

ANALYSIS

⁴It is accepted that a company is a different legal entity from its stockholders. It has no precise legal or technical meaning; rather, it can be understood to signify an association of people for a shared goal. It is acknowledged that when there is a breach of the criminal code, criminal culpability results. Any act's criminal culpability stems from the Latin maxim *Actus non facit reum mens sit rea*, which states that in order to hold someone or anything accountable, it must be proven that they committed an act or omission that is prohibited by law and that they have *mens rea*, which is defined as having a guilty mentality for legal purposes. It is included in the list of white-collar crimes.

Corporate criminal liability is defined as a crime committed by an individual or group of individuals who, in the course of their employment, commit acts or omissions that are illegal and with malicious intent when doing so benefits the business or any individual within the group of individuals, or who do so for the sake of a common goal or financial gain.⁵ Before the idea of holding a corporation accountable was introduced, there were many instances in which no corporation was held accountable for any criminal act because it was an artificial legal person and could not be jailed, and because it was not a natural person, there was no *mens rea*. When a business is found criminally culpable, it not only has an impact on the company's operations but also has the potential to negatively impact the criminal and financial well-being of the individuals involved in the illegal activity. However, it has been proposed that a fine be levied rather than incarceration in the event that a business is to be punished.

Development of concept of Corporate Criminal Liability-

Corporate crimes are defined as crimes perpetrated by companies or by members of corporations for which they are held legally liable for any actions or inactions that they take. The case of *Zed Telefilms Ltd. v. Sahara India Co. Corp. Ltd.* involved the release of a firm from defamation responsibility due to the absence of *mens rea*, which is seen as a legally required implicit prerequisite. The High Court ruled in *State of Maharashtra v. Syndicate* that a company could not be prosecuted for offences that involved corporal punishment or imprisonment. Although a company prosecuted for such offences would have been found guilty at trial, no order could have been put into effect. But in the case of *Iridium v. Motorola*, the Supreme Court took a different stance from the one mentioned above, ruling that a business might be held accountable for both common law and statute violations, including those requiring *mens rea*.

Modus operandi of Corporate Crimes : Corporate crimes can be committed using a variety of techniques. The crimes committed by companies in today's society include fraud, such as insurance scams, master card fraud, and cheque fraud. Money laundering occurs when stolen funds are transferred to financial institutions, asset management companies, etc. in order to hide their true source. corruption in which public servants abuse their positions by receiving gifts and dishonestly provide excessive assistance through unlawful ways, Insider Trade in the Financial Markets: when money market shares are traded in secret without the public knowing, Businesses may understate the company's transactions in order to evade paying taxes to the government.

Concept of corporate criminal liability in India-

⁹Prior to the establishment of the theory of corporate criminal liability, Indian courts did not punish corporations on the grounds that they lacked the necessary element, *mens rea*, because they were fictitious legal entities that could not be physically brought into court. .. Nevertheless, a number of legal issues arose as a result of this concept, which the Law Commission of India noted in its 41st report. An amendment to section

⁴ Aishwarya Pandey, Corporate Crime and Penal Policy in India: An Analytical Study, *International Journal of Law Management & Humanities*, 605-619 (2021)

⁵ Pradeep Kumar Singh, Corporate Criminal Liability in India, Volume 8, Issue 1, *Athens Journal of Law*, – Pages 31-48, January 2022

⁶ *Zed Telefilms Ltd. v. Sahara India*

⁷ *State Of Maharashtra vs Syndicate Transport Co. (P) Ltd*

⁸ *IRIDIUM INDIA TELECOM LTD. v/s MOTOROLA INCORPORATED & ORS.*

⁹ Kunal Kaushik Kally, A Critical Study on Corporate Criminal Liability with Special Reference to US and Indian Laws, vol 6, *SSRN*, (January 23, 2020).

62 of the IPC was suggested, but the bill that was made never passed. Nevertheless, the way courts viewed this concept was altered in the famous case of ¹⁰Standard Chartered Bank and Ors. v. Directorate of Enforcement, in which the bank was prosecuted for violating the Foreign Exchange Regulation Act, 1973. The Supreme Court held that a business can be held liable regardless of the mandatory punishment prescribed by the statute.

The companies in ¹¹Assistant Commissioner v. Velliappa Textiles Ltd. cannot be imprisoned since the Indian Penal Code does not permit punishment or prosecution of corporations for crimes that include incarceration. The Companies Act created the notion of corporate criminal culpability. The Companies Act of 2013, which superseded the Companies Act of 1956, raised the liability of directors. In accordance with the Indian concept of corporate criminal liability, the Companies Act of 2013 holds not only the directors but also the officer in default, which broadly includes full-time directors, key personnel, and other officers—in the absence of KMP—specified by the Board of Directors, as well as any other director who has knowledge of the act or has participated in it without objecting.

Role Of Judiciary in Making The Corporate Criminally Liable:

¹²In India, the idea of corporate criminal culpability has been evolving for the past several years. As corporate crimes and defaults take on more complex forms, authorities are realising that stronger and more definite rules and regulations are needed to prevent companies from committing these kinds of crimes. Additionally, courts are beginning to take a harsher stance on corporate criminal culpability and are expanding it beyond its original, constrained parameters. The idea of corporate criminal culpability has been dispersed throughout several legislation and legal rules in addition to the Indian Penal Code of 1860. The notion of corporate criminal culpability has undergone continuous development since its inception. Numerous common challenges in using it in real-world situations have been solved. Knowledge about the types of evidence that might be used to resolve corporate criminal culpability as well as the associated procedural requirements have developed and been approved by legal systems both in India and elsewhere. It has been quite simple to establish criminal culpability for individuals, but not so for corporations. The concept of corporate criminal culpability and its repercussions have also been increasingly revised by Indian courts.¹³

The court rulings have established the framework for addressing corporate misgovernance problems, which have devastated millions of naive investors and their respective households. The general public has to be shielded from many financing businesses, according to the courts. Accordingly, the Supreme Court declared that "the state has a constitutional obligation to protect economically and socially disadvantaged sections of society against exploitative practises by corporations." The judiciary is also aware of the influence big companies have and how best to use it for the greater welfare of society. Regarding this, Justice G.P. Mathur declared: "Businesses are getting bigger, and they have a lot of resources and finances at their disposal. Sometimes, they may break the law or put the lives of others in danger while conducting business. Various corporations are involved in large-scale financial wrongdoing. A stable community with a healthy economy depends on corporations adhering to criminal laws, since they already make up a significant portion of the commercial, industrial, and social domains.

One of the main issues that needed to be resolved was what type of penalties and fines may be placed on a company for breaking the law. Since a company is a virtual legal entity and cannot be imprisoned, it was necessary to investigate other possibilities. The question at hand was whether the courts could substitute penalties for the term stipulated by law. This problem also has further repercussions in India.¹⁴ The IPC has several provisions that provide penalties in addition to jail sentence, or occasionally both. The question of what punishment should be given to a business for crimes that call for both incarceration and fines—since a corporation is considered a "artificial person" and cannot be imprisoned—was irrelevant. This problem has

¹⁰ Standard Chartered Bank and Ors. v. Directorate of Enforcement

¹¹ Assistant Commissioner v. Velliappa Textiles Ltd

¹² Arshiya Thansum and . Kannappan A Critical Study on Corporate Criminal Liability with Reference to Indian Case Laws, International Journal of Pure and Applied Mathematics, Volume 119 No.172018,681-692

¹³ V. Vijaya Lakshmi, Corporate Criminal Liability - A Critical Legal Study, Volume 5 PenAcclaims, pg - 12, January 2019

¹⁴ Rohit Dhingra and Shruti Kakkad , Corporate Criminal Liability: An Emerging Issue, 4 (2) IJLMH Page 1003 - 1014 (2021)

been tackled in the innovative situations. Businesses cannot avoid legal action just because the crime for which they are charged requires a jail term.

In the two most recent instances, ¹⁵Sunil Bharti Mittal v. Central Bureau of Investigation ("CBI") and others and ¹⁶Iridium India Telecom Ltd v. Motorola Incorporated and others, the courts have made an effort to define the legal meaning and consequences of corporate criminal culpability. A corporation can be found guilty of common law offences as well as statute offences, including those needing mens rea, in much the same way as an individual. When an individual or group in charge of a corporation's affairs commits an offence related to the company's operations, the corporation becomes criminally liable. Under these conditions, it would be required to determine if the person or group of people has such a strong degree of control over the corporation that it can be argued that the person or group of people thinks and acts on behalf of the corporation.

Theories of Corporate Criminal Liability

¹⁷Generally speaking, a corporate organisation can commit a crime in one of two ways: 1. When the crime does not need purpose, such as when it involves acts or omissions that result in tortious responsibility, such as pollution, food adulteration, and numerous other crimes. Crimes against property, in all its forms, are examples of crimes where purpose is required.

Theory of Identification This approach was expressly created to hold companies accountable for crimes that needed mens rea. According to this idea, a company's acts and mental state that are present in the action stage of its directors or workers should be regarded as the corporation's own actions and mental state. Generally speaking, there are two ways that a business entity might break the law: 1. When there is no need for a reason for the crime, such as when it involves tortious responsibility-causing acts or omissions like food adulteration, pollution, and many other offences. All types of crimes against property are instances of crimes that need to have a goal.

Identification Theory This strategy was specifically designed to make businesses responsible for crimes requiring mens rea. This theory holds that a company's directors' or employees' acts and mental states during the action stage should be viewed as the corporation's own conduct and mental states.

¹⁸ Determining the notion of corporate criminal culpability has become crucial due to the fast expansion of international businesses and the globalisation of commerce. The Andhra Pradesh High Court noted in *State of Maharashtra v. Syndicate Transport Co. Pvt. Ltd.*, as cited in ¹⁹*Rachana Flour Mills Pvt. Ltd. v. Lalchand Bhanadiya*, that: "A number of corporate entities have emerged. These corporate entities must always operate via the authorised agents, directors, and officers. They don't appear to have any justification for being released from responsibility for offences committed by their employees or agents while posing as the corporate organisations' representatives. The actions of those operating on behalf of business entities are more visible to the average citizen. The theory of Respondent Superior Vicarious Liability This theory was first introduced into corporate liability and was formulated in the area of tortious responsibility.

Aggregation Theory: The American federal court system made a significant contribution to the field of corporate criminality with the development of the aggregation theory. In certain cases, a combination of many individuals' culpable personalities may result in a corporate wrong.

¹⁵ Ibid

¹⁶ Ibid

¹⁷ Arti Aneja, *Multidimensional Aspects of Corporate Criminal Liability: An Indian Perspective*, pg 34-38, JIJ, 2016

¹⁸ ANANYA AGARWAL, *Redefining Corporate Criminal Liability with respect to Environmental Crimes*, INTERNATIONAL JOURNAL OF LEGAL SCIENCE AND INNOVATION, Volume 2 | Issue 3 Page 28 - 46, 2020

¹⁹ *Rachana Flour Mills Pvt. Ltd. v. Lalchand Bhanadiya*

LEGAL ANALYSIS

Criminal Liability and the Companies Act Businesses have a significant role in our society. The primary law that regulates companies in India is the Companies Act, 1956, as amended by the Companies Act, 2013. It controls a wide variety of operations, from a company's establishment to its liquidation and wound up.²⁰ The Act establishes the legislative framework for a variety of business issues, such as the financial, organisational, and other managerial facets. It gives the central government the authority to go into a business's books of accounts, conduct a special audit, initiate an inquiry into the firm's operations, and begin legal action against the corporation for violating the Companies Act of 2013.

Regarding criminal culpability,²¹ Section 34 of the Companies Act discusses it specifically and relates to the criminal penalties for making false claims in a prospectus. There are several more parts where the sole punishment specified is jail, or imprisonment combined with a fine. It is abundantly evident from an examination of the Companies Act's offences and penalties that the Act is regulatory in character and does not support criminal prosecution for infractions of its provisions. The Company Law Board considers situations of frequent defaults, especially those involving enterprises in which there is significant public engagement, before initiating charges. Minor technical errors are often not prosecuted; instead, the board prefers that the management corrects such errors based on recommendations from the directors in the region and the company registrar. As a result, the strategy is more rehabilitative than deterrent, the fines seem more like administrative consequences, and the actual criminal legislation is not enforced.

Normative Recognition of Corporate Criminal Liability in India

²²The 2013 Companies Act India's legal governance environment is changing in step with the country's comprehension of corporate criminal culpability. One excellent illustration of the same is the Companies Act of 2013. To better regulate and discourage corporate fraud and standardise the governance process, the legislation has undergone significant revisions. This Act has explicit rules addressing common business crimes such as fraud and dishonesty. By increasing accountability and responsibility for independent directors, auditors, and other key players—who act as watchdogs to ensure that companies comply with The Companies Act and other relevant legal provisions—the Act prevents frauds and discourages their recurrence. Personal obligations are also prescribed by the Act for key people, auditors, workers, etc. Industry experts and members of the legal community have praised the current Act for being both comprehensive and tough, with actual consequences that effectively limit fraud. All things considered, it may be said that India's legal system is developing and adjusting to the growing necessity of reducing and managing the complex nature of corporate offences.

Punishment for fraud under Companies Act, 2013

According to this section, "Any person found guilty of fraud shall be punished with imprisonment for a term which shall not be less than six months but which may extend to ten years and shall also be liable to fine which shall not be less than the amount involved in the fraud, but which may extend to three times the amount involved in the fraud, without prejudice to any liability including repayment of any debt under this Act or any other law for the time being in force."²³ Penalties for Corporate Deception According to Section 447 of the Companies Act, fraud is defined as an act of conduct or omission that has an adverse effect on the business's interests by virtue of the firm misusing or abusing its authority.

This Act states that fraud is a crime that carries a minimum six-month sentence and a maximum ten-year sentence in jail. The amount of the fine can be as much as three times the value of the fraud and can't be less than that amount. The Act has proven successful in reducing corporate fraud and criminality. There were concerns made in the CLC Report that the scope of Section 447 was excessively broad and would subject small

²⁰ Ram Mohan, M. Corporate criminal liability in India. In Sage Business Cases. SAGE Publications, Ltd, 2019

²¹ Ibid

²² Ibid

²³ Pradeep Kumar Singh, Corporate Criminal Liability in India, Volume 8, Issue 1, Athens Journal of Law, – Pages 31-48, January 2022

violations to harsh, non-compoundable fines. Nonetheless, it was also mentioned during the talks that it wouldn't be reasonable to set a cutoff point for Section 447 punishment of fraud after the crime had been proven.

The Committee recommended that only frauds involving a minimum of rupees 10,00,000 or one per cent of the company's turnover, whichever is lower, be subject to Section 447 punishment (and not compoundable) due to concerns that the provision could be abused and negatively affect the recruitment of professionals for director positions, among other positions. Because the cost of prosecuting may exceed the amount involved, frauds below the threshold that do not harm the public interest may be treated differently and compounded.

CONCLUSION

Intentionally, the idea of corporate criminal culpability is still in its infancy in India. The idea and meaning of corporate criminal culpability are still in their infancy, despite efforts to curb corporate crime being undertaken through laws like the Companies Act of 2013. The Indian government is working hard to combat corruption, which is an ever-evolving threat. These kinds of crimes entail a shared liability between individuals and businesses, both civil and criminal. The extent to which rules and regulations can successfully regulate business activity is still up for dispute. Since most courts cannot adopt a conventional methodology, they are instead attempting to determine the best practicable decision given the circumstances. Many corporate crimes are still not effectively controlled by the current legal requirements. Determining corporate criminal responsibility is becoming more and more important as crimes change. As of right now, it has been noted that most situations do not result in criminal liability for corporations. The Companies Act of 2013 is a commendable endeavour to enhance corporate governance methodologies and augment the accountability and responsibility of corporations. It is obvious that more work has to be done in this area, but the progress made thus far shouldn't be discounted.

It is necessary to provide provisions to prevent misunderstandings about corporate criminal responsibility and how it affects businesses. In India, the business scandals are having a negative impact. Nevertheless, considering India's growth and achievements, companies are not held criminally accountable and, in the event that they are, just penalties would be meted out as punishment. The current criteria used to determine a company's criminal responsibility have drawn a lot of criticism and have been described as irrational and at odds with the core principles of the criminal code. In the realm of business, the government should compel the companies to implement policing measures in order to discourage criminal activity. If a corporation needs a professional evaluation, the court ought to have the authority to choose an appropriate individual or individuals to write a report on the business. When a company is sentenced, it should issue a few orders in a way that it believes would accomplish the sentencing goals, either in addition to or instead of issuing a fine. More severe penalties must be applied, such as corporate dissolution, which would allow the courts to determine whether a penalised firm can reorganise itself.

REFERENCES

1. Aishwarya Pandey, Corporate Crime and Penal Policy in India: An Analytical Study, International Journal of Law Management & Humanities. 605-619 (2021).
2. Pradeep Kumar Singh, Corporate Criminal Liability in India, Volume 8, Issue 1, Athens Journal of Law, – Pages 31-48, January 2022
3. V. Vijaya Lakshmi, Corporate Criminal Liability - A Critical Legal Study, Volume 5 PenAcclaims, pg - 12, January 2019
4. Kunal Kaushik Kally, A Critical Study on Corporate Criminal Liability with Special Reference to US and Indian Laws, vol 6, SSRN, (January 23, 2020).
5. Ram Mohan, M. Corporate criminal liability in India. In Sage Business Cases. SAGE Publications, Ltd, 2019
6. Arshiya Thansum and . Kannappan A Critical Study on Corporate Criminal Liability with Reference to Indian Case Laws, International Journal of Pure and Applied Mathematics, Volume119No.172018,681-692
7. Rohit Dhingra and Shruti Kakkad , Corporate Criminal Liability: An Emerging Issue, 4 (2) IJLMH Page 1003 - 1014 (2021)
8. Arti Aneja, Multidimensional Aspectsof Corporate Criminal Liability: An Indian Perspective, pg 34-38, JLJ, 2016
9. ANANYA AGARWAL, Redefining Corporate Criminal Liability with respect to Environmental Crimes, INTERNATIONAL JOURNAL OF LEGAL SCIENCE AND INNOVATION ,Volume 2 | Issue 3 Page 28 - 46 ,2020
10. Motorola Inc. v. Union of India, (2004) Cri.L.J. 1576
11. Sunil Bharti Mittal v. Central Bureau of Investigation citation
12. State Of Maharashtra vs Syndicate Transport Co. (P) Ltd
13. IRIDIUM INDIA TELECOM LTD. v/s MOTOROLA INCORPORATED & ORS.
14. Rachana Flour Mills Pvt. Ltd. v. Lalchand Bhanadiya
15. Assistant Commissioner v. Velliappa Textiles Ltd
16. Standard Chartered Bank and Ors. v. Directorate of Enforcement
17. State Of Maharashtra vs Syndicate Transport Co. (P) Ltd