
CORPORATE MANSLAUGHTER AND INDUSTRIAL NEGLIGENCE IN INDIA: THE NEED FOR LEGISLATIVE RECOGNITION

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ABSTRACT

The purpose of this research is to examine the absence of a legislative framework for Corporate Manslaughter in India, despite the growing number of accidents due to industrial negligence, environmental disasters, and workplace fatalities due to corporate negligence¹. The existing literature on Corporate Manslaughter in India mainly focuses on the financial crimes and other environmental violations and not enough attention is given to the issue of corporate manslaughter as a separate offence. The main problem lies in the absence of a clear and enforceable statutory framework to prosecute corporations for the deaths caused due to the gross negligence or the disregard for safety. Even though individuals of a corporation may be prosecuted, many times the corporation itself escapes liability. The deficiency in the Indian Law raises concerns about justice for the families of the victims, Corporate Accountability and compliance with global standards of corporate governance². Therefore, the problem is how can India legally recognize and regulate corporate manslaughter to ensure accountability and preventable deaths arising out of corporate negligence? The research reveals that currently Indian Law relies on the provisions that fail to address corporate manslaughter comprehensively. Comparative analysis helps in understanding that jurisdictions like the UK and Australia have enacted special statutes³ that hold corporations accountable for the deaths caused by the negligence of the management of the corporations. Therefore, the study concludes that there is an immediate need in India to legally recognize corporate manslaughter as an offence to strengthen the concept of corporate accountability and protect the right to life under Article 21 of the Indian Constitution. The current legal mechanisms are inadequate to address systemic corporate negligence that results in the loss of life. Introducing a specific legislation for Corporate Manslaughter based on the international models but tailored to India's Socio-economic realities would serve as a deterrent mechanism of justice, would bridge the existing legal gap and

¹ Union Carbide Corporation v. Union of India, (1989) 3 SCC 38.

² OECD, Principles of Corporate Governance (2015)

³ Corporate Manslaughter and Corporate Homicide Act, 2007; Criminal Code Amendment (Workplace Deaths) Act, 2004 in Australia.

enhance corporate governance. This research adopts a Doctrinal method of research as it mainly focuses on the existing statutes, case laws, and other writings by scholars relevant to the study.

Keywords: Corporate Manslaughter, Industrial Negligence, UK's Corporate Manslaughter and Corporate Homicide Act, 2007, Industrial risk, Corporate Accountability.

INTRODUCTION

India has faced some of the world's most devastating industrial disasters, such as the Bhopal Gas tragedy (1984) and the Vizag Gas Leak (2020)⁴, which demonstrates severe gaps in corporate accountability. Although there were disastrous consequences of such incidents in India, there is a lack of specific statutory frameworks similar to that of the United Kingdom. As a result of this the victims and their families of such incidents do not receive adequate compensation and the systemic industrial risk remains unchecked. Due to the absence of a legislation in India raises major concerns about corporate accountability, justice and deterrence. The main challenge is balancing industrial growth and human safety simultaneously and ensuring that corporations cannot hide behind the veil of separate legal entities when their negligent conduct leads to fatalities. This very gap necessitates the need for a statutory framework specifically for Corporate Manslaughter.

This research aims to critically examine the absence of a specific legislation for Corporate Manslaughter in India and its implications for corporate liability, rights of victims and Industrial safety. It mainly questions what are the legal and political factors that have caused the absence of such a legislation with regard to Corporate Manslaughter similar to that of the UK's Corporate Manslaughter and Corporate Homicide Act, 2007, therefore highlights the constraints that act as obstacles to legislative reforms. It also questions how this absence of a specific legislation affects the basic fundamental rights such as right to life, health and dignity of the victims and also explores the role of a new legal framework and how it may strengthen corporate accountability with regard to the same. The study also examines the effectiveness of existing civil and criminal remedies in addressing industrial disasters such as Bhopal and Vizag incidents, It also studies how the Indian judiciary has aided in expansion and interpretation of the concept of corporate liability in cases of industrial disasters due to gross negligence and also questions whether judicial activism compensates for the legislative gaps with respect to

⁴ Vizag Gas Leak: At Least 11 Killed, Hundreds Hospitalised, THE HINDU (May 7, 2020)

this. This research adopts a Doctrinal method of research as it mainly focuses on the existing statutes, case laws, and other writings by scholars relevant to the study. It involves an analysis of the sources such as existing legislations, judicial precedents and other secondary sources such as other journal articles, commentaries and reports.

BARRIERS TO LEGISLATIVE RECOGNITION OF CORPORATE MANSLAUGHTER IN INDIA

In India there is no legislation with respect to Corporate Manslaughter like the one present in the United Kingdom known as the Corporate Manslaughter and Corporate Homicide Act,2007⁵. Even though India has provisions under the Bharatiya Nyaya Sanhita,2023 (BNS) for imposing liability on natural persons and not artificial entities. The significant legal factor is that Indian courts have been heavily reliant on the “identification doctrine” which has made it difficult to apply direct mind whose negligence is equal to that of the corporation⁶. In most of the large corporations, the responsibility is divided among various levels of management which makes it nearly impossible to hold accountable under the existing⁷. There are various political factors such as a major focus and priority of economic growth and investment over other things. India always focuses only on liberalization reforms and industrialization; these factors caused the absence of the legislation for Corporate Manslaughter in India. It is also due to the belief that if there are stringent laws for Corporate Manslaughter it will disrupt the objectives and raises concerns with respect to deterring domestic and foreign investors. The best instance of political factors affecting the existence of legislation for Corporate Manslaughter is the Bhopal Gas Tragedy of 1984 , even though it has been one of the worst industrial disasters in Indian history, the state's response was diluted charges, settlements and avoidance of measures that set a precedent to corporate accountability. This portrays how the political priorities of industrialization and foreign investments are given more importance than justice and deterrence⁸.

CORPORATE MANSLAUGHTER AND THE PROTECTION OF WORKER'S RIGHTS

The absence of legislation in India with respect to Corporate Manslaughter has left a critical deficiency in the protection of fundamental rights guaranteed under the Constitution of India,

⁵ Corporate Manslaughter and Corporate Homicide Act 2007, c. 19 (U.K.)

⁶ Iridium India Telecom Ltd. v. Motorola Inc., (2011) 1 SCC 74

⁷ Celia Wells, Corporate Criminal Liability: A Ten Year Review, 14 CRIM. L.F. 349 (2003)

⁸ Upendra Baxi, Inconvenient Forum and Convenient Catastrophe: The Bhopal Case

particularly the rights to life, health and dignity under Article 21. The provisions under various acts such as the Bharatiya Nyaya Sanhita, 2023 and The Factories Act, 1948 are designed in a manner that imposes liability only on natural persons and not on artificial entities⁹. The individual-centric liability approach only results in the prosecution of the lower level of employees, while the corporate entity itself is exempted from corporate accountability. As a consequence of this the corporation can externalize the risks and cost operations onto their employees with minimal legal liability, thereby carrying forward a culture where profit maximization overrides human welfare and safety. The impact of the absence of a legislation is most evident in the recurring industrial tragedies witnessed in India, that ranges from the Bhopal Gas Disaster to the more recent incidents of chemical plant explosions and factory fires. In each of these cases, affected workers and communities have faced not only deaths but also long-term health complexities, and environment degradation.¹⁰ The existing compensation mechanisms are inconsistent, criminal liability is diluted and deterrence against potential violations remains weak. As a consequence, the constitutional promise of a dignified life and safe working conditions is still largely illusory for most of the workers in hazardous industries. If a new legislative framework is introduced in India, it must impose corporate criminal liability, mandate rigorous safety protocols, and prescribe stringent penalties which include fines, mandatory compliance audits and in certain severe cases, restrictions on business operations. Such a framework would compel corporations to internalize the costs of negligence. Moreover, when the provisions introduced are victim-centric, it will include compensation schemes and rehabilitation measures that would ensure that affected communities receive timely and meaningful redress¹¹. Beyond deterrence and compensation, a statute for corporate manslaughter will also carry a controlling value by embedding principles of corporate accountability within the legal system. It would align Indian Law with international developments, particularly with the UK's Corporate Manslaughter and Corporate Homicide Act, 2007. It would also significantly reinforce the constitutional mandate that the right to life and dignity cannot be subordinated to economic interests.

BALANCING JUDICIAL INNOVATION WITH THE NEED FOR LEGISLATIVE REFORMS

The industrial growth of India has come at high human cost, epitomized by disasters such as

⁹ Bharatiya Nyaya Sanhita, No. 45 of 2023 (India); Factories Act, No. 63 of 1948, §§ 92–104A (India)

¹⁰ Id.8

¹¹ United Nations Environment Programme, Guidance on Corporate Accountability and Victim Compensation (2011)

the Bhopal Gas Tragedy in 1984 and the Vizag Gas Leak in 2020. These incidents raised major concerns with respect to India's legal framework in ensuring justice and compensation to victims of negligence by corporations. The two main issues that are hand are the effectiveness of existing civil and criminal remedies in addressing industrial disasters, and the evolving role of the judiciary in expanding corporate liability amid the existing legislative gaps. The absence of a legislation for corporate manslaughter complicates both compensation and further deterrence, while judicial interventions cannot completely substitute a comprehensive legislative action. The primary mechanisms in India for civil remedies lies in tort law and criminal remedies lies in provisions of the BNS. However, both these remedies have shown considerable weaknesses while being applied in large-scale incidents of industrial accidents. In the Bhopal Gas Disaster, the Supreme Court in *Union Carbide Corp. vs. Union of India* facilitated a settlement of 470 million dollars between Union Carbide and the Government of India. Even though the compensation was swiftly decided upon, it was highly inadequate for the deaths and injuries that occurred to victims and their families. In India, civil remedies are further weakened by the procedural delays and excessive dependence on negotiations led by the state that that often prioritize industrial interests over the rights of the victims. In terms of criminal remedies, companies and their offices can be prosecuted under provisions of the BNS but only for individual misconduct and not for systemic corporate failures. In the Bhopal Gas Tragedy, top executives of the Union Carbide India Ltd. were convicted only under section 304A¹² of the then called IPC and now section 106 of BNS which resulted in a light sentence. It underscores the inadequacy of the existing criminal remedies in imposing proportionate liability as it trivialized mass industrial deaths. Without a statute for corporate manslaughter corporations only evade accountability for systemic negligence and the disregard for safety.

The Indian Judiciary has often stepped in through various interpretations to broaden the aspect of corporate liability. In the case of the *Oleum Gas Leak*¹³, the Supreme Court expanded liability standards by introducing the principle of absolute liability for hazardous industries. Unlike the principle of strict liability under the common law which allows for exception, absolute liability imposes responsibility on corporations for dangerous and hazardous activities. The judiciary further recognized that corporations, as juristic persons can be held criminally liable¹⁴. In the case of *Standard Chartered Banks vs. Directorate of Enforcement*, the Supreme court affirmed that corporations also can face criminal prosecution for offences

¹² Causing death by a rash or negligent act

¹³ *M.C. Mehta vs Union of India*, (1987) 1 SCC 395(India)

¹⁴ *Standard Chartered Bank v. Directorate of Enforcement*, (2005) 4 SCC 530 (India)

that require mens rea, with penalties limited to fines where imprisonment is not applicable. The judiciary lacks the institutional capacity to design comprehensive regulatory frameworks or to enforce long-term corporate accountability. For instance, the principle of absolute liability that was established, though it is progressive, has not been consistently applied across cases. The role of the judiciary is reaction rather than preventive in nature as it addresses harm after it has occurred rather than establishing deterrence. Judicial activism can surely mitigate the shortcomings of the absence of a legislative but cannot replace a statutory framework for Corporate Manslaughter¹⁵.

In India, introducing a law for corporate manslaughter would complement the exiting remedies by clearly defining corporate criminal liability for deaths that are caused by negligence and will also provide for stringent fines and other mandatory compliance reforms and this will ensure that industrial disasters are treated with the gravity they deserve instead of being treated as any other accidents¹⁶.

LITERATURE REVIEWS

The literatures studied¹⁷ as a whole shows that there is a powerful and sustained scholarly interest in the inefficiency of the traditional legal frameworks in the context of corporate liability on workplace deaths and massive industrial catastrophes. In jurisdictions, especially in the United Kingdom, the United States, Canada, and Australia, academics point to the weaknesses of classical doctrines of criminal law, including vicarious liability, the identification doctrine, and individual mens rea in understanding the complex, systemic nature of corporate crime. It is to these works that the argument that corporate actors currently live in the layers of management, the decentralization of the decision-making process, and organizational cultures that mask personal responsibility is converged into that corporations can dodge any real criminal responsibility over the death resulting due to negligence. Literature heavily endorses the move to liability-based models of organizations, with the introduction of the Corporate Manslaughter and Corporate Homicide Act, 2007 in the United Kingdom, as one of the progressive legal frameworks addressing these issues. A number of authors concentrate on the development and relevance of the Corporate Manslaughter and Corporate Homicide Act, 2007 in particular by placing it in the context of a radical change in the way criminal

¹⁵ Vineet Narain v. Union of India, (1998) 1 SCC 226 (India)

¹⁶ Corporate Manslaughter and Corporate Homicide Act 2007, c. 19 (U.K.); Organisation for Economic Co-operation and Development (OECD), Corporate Governance and Risk Management (2014)

¹⁷ References 28-37

responsibility is perceived as a systemic organizational failure. These cases follow the historic hardships of the English courts in their effort to prosecute corporations under the doctrine of identification, that is to prove that a directing mind and will which personally had the necessary mens rea of the company was present. This practice was not effective with large companies whose decision-making powers are decentralized. The 2007 Act also substituted this hard model by a model that evaluates whether the way the activities undertaken by an organization were handled or structured constituted a gross failure of a duty of care leading to death. Theorists feel that the change in the legislation reflects a wider change in criminal jurisprudence which is that corporations are now seen as independent legal persons that have collective responsibility. The Act is not only described as a procedural reform but a normative statement that strengthens corporate responsibility, occupational safety and trust of criminal justice that people have. One of the common themes within the literature is the failure of the regulatory enforcement tools in considering fatal corporate negligence. The conventional occupational safety laws, civil fines and administrative penalties are widely denounced as having a low deterrent impact, low enforcement ability and fail to provide moral sanctions that would reflect the loss of life severity. Empirical research on the perceptions of the population demonstrates that people are not satisfied with regulatory settlements and civil compensation regimes, which are perceived as inefficient in punishing and unable to help to express the disapproval of the society towards corporate behavior that results in death. According to scholars, the communicative and symbolic role of criminal law is to articulate common moral outrage and increase social values about dignity, safety, and accountability. This communicative aspect is especially brought into the limelight of analysis of the societal response to occupational deaths in the UK, with the emergence of corporate manslaughter laws driven by long-term pressure by the populace on the government in the wake of high-profile tragedies, including rail crashes and industrial explosions. It is also in the literature that the socio-political aspects of corporate criminalization are addressed, whereby the law reform is often triggered by public anger, media attention, and political activism. Scholars also claim that workplace fatalities are not just personal tragedies but social incidents that undermine the confidence of people in the corporate governance and regulatory bodies. Criminalizing corporate negligence, therefore, acts as a form of legitimizing operation since it reaffirms the state in its role of safeguarding workers and ensuring that major economic actors are held to account. The fact that the results of the empirical studies show that the public is in favor of criminal penalties highlights the fact that the society would prefer tougher legal actions towards corporate wrongs. This aspect of social legitimacy enhances the normative argument of the

introduction of corporate manslaughter legislation in a country like India where industrial calamities are still being experienced in the context of lax enforcement and disjointed liability frameworks. The other significant literature line of thought is critical analysis of the conceptual limits of manslaughter and criminal negligence. Theoretical literature on criminal law reveals the confusion on the distinction between accident, civil negligence, and criminal culpability. Researchers consider that a lack of legal limits can be used to strategically position fatal accidents using corporations as accidental and violating the liability. This mental ambiguity compromises deterrence and deteriorates the provision of justice to victims. The literature suggests the need to have more explicit statutory provisions that should define when a negligent act becomes a criminal responsibility especially in corporate settings where there are systemic safety failures. Such theoretical understandings are particularly applicable to jurisdictions such as India, where some of the biggest industrial tragedies have in the past led to criminal liability watered down and a civil action, as was the case with the Bhopal Gas Tragedy. The literature includes a large contribution of comparative scholarship, analyzing the efforts, in various jurisdictions, to reduce the contribution of doctrines to the obstacles to corporate criminal liability. The comparative studies made on the legal framework of the UK, Australia, Canada, and the United States show that there are various models that are used to attribute criminal responsibility to corporations. The model of corporate culture in Australia pays more attention to the role of organizational norms and compliance failures whereas the Canadian reforms are related to the responsibility of senior officers and the negligence in the systems. The model of statutory failures in the UK focuses on failures by management as gross failures of duty. Such comparative observations reveal that the contemporary legal systems are gradually shifting the focus of individualistic fault paradigm toward organizational and structural responsibility. According to scholars, such reforms enhance the possibilities of prosecuting, increasing the deterrence and bringing the criminal law in line with the dynamics of the modern corporate governance. These models are constantly viewed in the comparative literature as useful precedents to those countries such as India which aim to develop their corporate criminal liability frameworks in order to become modern. Some of the authors examine particularly the restraints of Indian corporate criminal jurisprudence, the history of which has been to refuse to hold corporations culpable of criminal acts that demand *mens rea*. The continuity of the reasoning based on identification and procedural limitation has been the cause of inconsistent accountability outcomes, especially those related to industrial negligence and mass destruction. Despite the fact that judicial innovations have slowly come to accept corporations as prosecutable and punishable, there has been a lot of loopholes in the enforcement due to no

specific statutory body on corporate manslaughter. Researchers point out that the current systems and regulations in place under the Indian Penal Code, as well as the regulatory laws, are insufficient and unable to deal with the systemic failures of the companies, resulting in token prosecutions or insignificant fines. This is a weakness that weakens deterrence, a culture of lax regulation and the trust the people have on the justice system.

The conflict between corporate character and personal responsibility is also discussed in the literature. Although other academics recommend that the corporate veil should be lifted and the individual directors, managers, and executives should face significant personal criminal liability, others urge that to address a problem, it is essential not to ignore the role of an organization as a whole but rather scapegoat those who hold the most senior roles. It is advisable to have a middle ground whereby both companies and individuals involved to cause negligence systemically are liable to death. This model of dual liability is considered necessary in order to make sure that there is meaningful deterrence, internal compliance reform and ethical corporate governance. Another familiar element in the literature is that the corporate liability must not just be punitive in its form of sanctioning but must also serve to encourage active risk management, investment in safety, and culture shift in the organizational environment. The other valuable impact of the literature is the criticism of the complexity and evidentiary demands of prosecutor in the context of corporate manslaughter. According to the scholars, it takes a lot of documentation, expert testimony and institutional capacity to establish gross negligence, causation, and management failure. The division between the criminal justice institutions and the regulatory bodies tends to undermine investigation and postponing justice. Other authors suggest combining regulatory enforcement with criminal prosecution by making safety regulators be able to bring up criminal charges where a severe violation of a rule leads to death or injury. Such a combined enforcement approach can be considered more effective, skill-based, and receptive to working conditions. According to the literature, institutional reform and capacity building are necessary to ensure that legislative innovation can have its desired deterrent effect on its own. Theoretical principles of criminal liability of the corporation are also deeply discussed. As the historical comparisons show, corporate liability is not a new construct in common law and statutory practice but has deep roots in both. The change in the vicarious liability to collective responsibility is the wider changes in the legal theory that corporations are moral and legal entities that can be guilty. Researchers say the corporate criminal liability is used in various ways such as to punish, to prevent, to control and to condemn. Considering these theoretical justifications enhance the validity of applying criminal

restrictions to corporations in the case of severe damages such as murder and manslaughter. The literature therefore nullifies the fact that criminal punishment is incompatible with corporations. A number of works evaluate questioning the efficacy of current corporate manslaughter regimes, such as the UK one itself. Although it has a symbolic and normative value, scholars find certain difficulties in low prosecution rates, few penalties, and evidentiary barriers. It has been claimed that the arena of use of general terms like gross breach and failure of senior management leaves some interpretation ambiguity and enforcement unpredictability. Other suggestions support more explicit, statutory obligations based on safety regulations as opposed to ethical blame models. These criticisms can be useful to those jurisdictions considering a legislative adoption because it raises the dangers of copying the models used elsewhere without the need to adapt them in a local setting and institutional preparedness. Taken as a whole, the literature would come to a similar conclusion that the legislation on corporate manslaughter is not only legally but also socially justified in the contemporary industrial economy. The continued occurrence of workplace deaths, environmental catastrophes, and overall safety system failures points to the fact that civil liability and civil regulation measures will not be enough to provide accountability and prevention. The criminal law offers a special process to express moral reproach, prevent irresponsible corporate conduct, and recover popular trust. The comparative data shows that legal recognition of corporate homicide enhances clarity of law and effectiveness of prosecution and organizational obedience whereby there is a good institutional capacity and regulatory alignment. In the case of the Indian context, the literature is quite categorical that the legislative reform is necessary in order to close the accountability gap in the instances of industrial deaths. The lack of a dedicated corporate manslaughter law carries on with the use of old doctrine, piecemeal application of regulations, and uneven court practice. The same issues of disappointment of the population, poor deterrence and insufficient victim justice are repeated and reflect the situation experienced in the UK before the 2007 Act. The comparative lessons can guide India on developing a custom-made statutory framework to acknowledge the responsibility of organizations, the establishment of clear liability limits, the sharing of corporate and individual liability, and the incorporation of regulatory acumen in the criminal enforcement. To summarize, the analyzed studies altogether create an effective normative, doctrine, and empirical basis of identifying corporate manslaughter as a unique type of criminal offense. The scholarship proves the point that corporate criminal liability should be adjusted to the actualities of complicated organizational decision-making and systematic risk generation. The literature can be used to provide a multidimensional rationale of the legislative reform on the

basis of theoretical knowledge, comparative legal models, empirical views of people and issues of practical enforcement. In the case of jurisdictions such as India, the experience of the UK and other similar regimes serves to remind them of the importance of enacting up to date corporate homicide laws in order to protect victims, curb careless corporate conduct, enhance workplace safety regulation and reestablish the rule of law in an age of corporate imperialism.

CONCLUSION

The main issue of corporate manslaughter and industrial negligence in India reflects a need for legislative recognition, as the current legal provisions fails to properly address the magnitude of harm caused by negligence by large-scale. In India, there have been one of the world's most deadly industrial disasters, such as the Bhopal Gas Tragedy, 1984 and the Vizag gas leak, 2020, which exposed weaknesses corporate accountability and the insufficiency of civil and criminal remedies in providing justice to victims. Victims and their families struggle for decades to secure compensation and justice, while corporations escape with very less financial penalties that are not proportionate to the harm caused. The recognition of corporate manslaughter in Indian law as statute would mark a transformative step in bridging this accountability gap by assign responsibility directly to the corporate entity rather than just punishing individuals of the corporation. Such a framework would also ensure that corporations have compliance, safety at workplace and management of risk as a part of governance practices as their priority. Ultimately, the introduction of a legislation of corporate manslaughter is not only a matter of legal reform but a societal necessity as it highlights the principle that human life cannot be compromised over the sole motive of profit. For an industrializing nation like India, which aims to achieve global economic leadership, embedding such accountability in law is essential to ensure sustainable development, safeguard public trust, and uphold the virtue of life against corporate negligence.

REFERENCES

1. Victoria Roper, *The Corporate Manslaughter and Corporate Homicide Act 2007 — A Ten-Year Review*, 82 *J. Crim. L.* 48 (2018)
2. *Corporate Manslaughter and Corporate Homicide Act, 2007*, c. 19 (U.K.).
3. *M.C. Mehta v. Union of India*, AIR 1987 SC 965 (Oleum Gas Leak Case)
4. *Corporate Manslaughter in India: Bridging Legal Gaps with Governance Mechanisms*, *NLS Bus. L. Rev.* (article) (2025)
5. *Bhopal Gas Leak Disaster (Processing of Claims) Act, 1985* (India)
6. Bar & Bench, *Incorporating “Corporate Homicide” in the IPC: Why & How*, Bar & Bench (Sept. 2019).
7. Business & Human Rights Resource Centre, *Union Carbide / Dow — Bhopal Litigation Overview* (resource page)
8. S. Daniels, *The Corporate Manslaughter Act: Goals and Expectations*, *Int’l Inst. for Crim. Justice paper* (2009)
9. Stuart Allan, *The Corporate Manslaughter and Corporate Homicide Act — A Doctoral Thesis*, Univ. of Glasgow (201)
10. National Human Rights Commission (India), *Report on Industrial Disasters and Corporate Accountability*
11. P. Thomas, *Corporate Liability for Homicide: A Statutory Framework*, *Duke L.J.* (Note) (2011)
12. *The Fiction of the Criminalisation of Corporate Killing*, Birkbeck e-print (critical assessment) (2024)
13. *Corporate Crime and Sentencing in India: Required Amendments*, *Indian J. of Crim. & Just. Studies* (2020)
14. V. Nair & R. Gupta, *Comparative Analysis of Corporate Manslaughter Laws in India and the UK*, *Int’l J. of Res. in Eng. & Mgmt. Sci.* (2024)
15. Manupatra legal commentary, *Corporate Manslaughter and Corporate Homicide Act, 2007 — Analysis*
16. *Progress or Stagnation? The evolution and reform of corporate criminal liability*, ScienceDirect article (2025)
17. Corporate Justice Coalition, *Corporate Criminal Liability: Options Paper* (2022)
18. A. Roy, *Bhopal 40 Years On: Lessons for Corporate Accountability*, IHRB commentary (2024)

19. S. Bhat, Regulatory Gaps and the Case for Corporate Homicide Statute in India, 8 IJLR (2025)
20. ResearchGate article, Corporate Manslaughter in India: Bridging Legal Gaps with Governance Mechanisms
21. Adarsh Kurian, Comparative Analysis of Corporate Manslaughter Laws in India and United Kingdom, 7 I.J. Res. Eng'g Sci. & Mgmt. 97 (2024)
22. Shivanesh Ram R.R., Corporate Manslaughter: A Case for Criminal Liability of Corporate Entities in India, 5(1) Indian J. of Legal Review 1010 (2025)
23. Gaurav Mitra & Lavanya Pathak, Evolution of Corporate Criminal Liability in India, 6(6) Int'l J. L. Mgmt. & Humanities 3694 (2023)
24. Abhishek Chatterjee & Laxmi Kumari, Corporate Criminal Liability: Assessing Legal Accountability, 7(1) Int'l J. L. Mgmt. & Humanities 1127 (2024)
25. Aaftaab Dhabhar, An Analysis of Criminal Liability of Companies Under Indian Law, 9(2) J. Legal Stud. & Research 109 (2023)
26. Vikas Sharma, Sushmita Das & Nimisha Sinha, A Critical Study on Indian Law on Corporate Criminal Responsibility, 20(1) Elementary Education Online 6233 (2021)
27. Pratiksha Mohanty, Regulating Corporate Criminal Liability: Global Perspectives and Lessons for India, 3(4) Int'l J. L., Soc'y & Sci. Studies 512 (2025)
28. Bharadwaj, A. (2009). Corporate Manslaughter and Corporate Homicide Act, 2007. National Law School of India Review, 21(1), 201-212.
29. Almond, P., & Colover, S. (2012). COMMUNICATION AND SOCIAL REGULATION: The Criminalization of Work-related Death. The British Journal of Criminology, 52(5), 997-1016
30. Chris. W. Johnso, Ten contentions of corporate manslaughter legislation: Public policy and legal response to workplace accidents, Safety Science, Volume 46, Issue 3, 2008, Pages 349-370
31. Graham Virgo.(1994). Back to Basics. Reconstructing Manslaughter. The Cambridge Law Journal, 53(1), 44-53.
32. Bhaskar, T.K., & Umakanth, V.(1996). CORPORATE CRIMINALITY AND LAW. Journal of the Indian Law Institute, 38(2), 218-228.
33. Rusi Engineer. (1989). Punishing Corporate Negligence: Industrial Disasters and Criminal Law. Economic and Political Weekly, 24(14), 711-713.
34. Harlow, J.W. (2011). CORPORATE CRIMINAL LIABILITY FOR HOMICIDE: A STATUTORY FRAMEWORK. Duke Law Journal, 61(1), 123-166.

35. Glazebrook, P. R.(2002). A better Way of Convicting Businesses of Avoidable Deaths and Injuries? *The Cambridge Law Journal*, 61(2), 405-422
36. Lee, F.P. (1928). Corporate Criminal Liability. *Columbia Law Review*,28(2), 181-200
37. Nwafor, A.O. (2013). Corporate Criminal Responsibility : A Comparative Analysis. *Journal of African Law*, 57(1), 81-107.