



Pricol Limited

Anti-Bribery & Anti-Corruption Policy

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1.0 Introduction

Anti-Bribery & Anti-Corruption policy highlights the Pricol Limited's commitment to conduct the business in compliant environment with honesty, integrity and in conformity with the highest possible ethical standards

2.0 Objective

The main objectives of this policy includes:

- 2.1 To spread awareness about the possible misconducts related to bribery and corruption.
- 2.2 To outline the risks of directly or indirectly involving in bribery and corruption.
- 2.3 To ensure monitoring, prevention and detection of fraud, bribery and all other corrupt business practices.
- 2.4 To act professionally, fairly and with integrity in all our business dealings wherever we operate.
- 2.5 To vigilantly observe and uphold the position against bribery & corruption.
- 2.6 To ensure compliance with regulatory requirements with respect to Anti-Bribery and Anti-Corruption laws.

3.0 Scope

This policy is applicable to our Company and all activities undertaken for or by the Company directly or indirectly.

4.0 Definitions

- 4.1 **Pricol Limited** – Herein referred as “the Company”.
- 4.2 **Bribery** – Bribe is anything of value, including money, gifts and entertainment, other business courtesies, hospitality, or personal gratification given, offered, or received in an attempt to influence a person's behavior, in order to obtain or retain business, or to secure an unfair benefit or advantage.
- 4.3 **Corruption** – Corruption is dishonest behavior by any employee in any position in the company. Corruption can include giving or accepting bribes or inappropriate gifts, under-the-table payments or benefits, diverting funds, laundering money, and defrauding investors.

- 4.4 **Facilitation Payments** – Facilitation payments are unofficial payments made to secure or expedite a routine Government action to a Government Official. These include small payments made, directly or indirectly, to Government Officials for the purpose of expediting or securing routine, non-discretionary Government action, such as securing a business permit or license, customs invoice or visa, or providing services like police protection.
- 4.5 **Family Member** – A spouse, parent, sibling, grandparent, child, grandchild, mother or father-in-law, domestic partner, or other family member who lives with you or who is otherwise financially dependent on you, or on whom you are financially dependent.
- 4.6 **Stakeholders** – Shall mean to include employees working at all levels and grades (whether permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, interns, agents, business partners, vendors, service providers, suppliers, contractual staff, apprentices, direct selling agents, and any other person / entity acting for and on behalf of the company.
- 4.7 **Government Official** – Government Official refers to any 'public servant' as defined under the Indian Prevention of Corruption Act 1988, including inter alia the following:
- 4.7.1 An officer, employee, agent, or other individual, regardless of rank or title, working in an official body for or on behalf of Central Government, State Government, local authority or establishments under the control of such Government, its departments, agencies, or instrumentalities, including Government- or state-owned or controlled entities.
 - 4.7.2 Any other person holding an office by virtue of which he is authorized or required to perform any public duty.
 - 4.7.3 An officer, employee, agent or other individual, regardless of rank or title, acting in an official capacity for or on behalf of a public international organization.
 - 4.7.4 Any political party, officer, employee, or agent of a political party, or party official; or any candidate for political office.

5.0 Forms of Bribery that poses the greatest risk

5.1 Bribes

- 5.1.1 The company prohibits all forms of Bribery and corruption practices involving, but not limited to, Government Official or a private sector person or company.
- 5.1.2 The company conducts its business lawfully and ethically and expects every Stakeholder to conduct its business with integrity.

- 5.1.3 The company prohibits the making or accepting of Facilitation Payments of any kind for any favours to facilitate or expedite official business or work.

5.2 Gifts and Hospitality

- 5.2.1 Employees or members of their immediate families should not involve in activities of accept cash or its equivalent, entertainment, favor's, gifts or anything of substance to or from competitors, vendors, suppliers, customers or others that do business or are trying to do business with the company.
- 5.2.2 Loans from any persons or companies having or seeking business with the company should not be accepted.
- 5.2.3 All relationships with those who deals with the company should be cordial.
- 5.2.4 An inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage is prohibited.

- 5.3 **Government Bribery** – The company is restricted to bribe a Government official in any case.

- 5.4 **Commercial Bribery** – The company does not encourage the following:

- 5.4.1 Commercial gifts, reward or other advantage to induce or reward behavior which is dishonest, illegal or a breach of trust, loan, fee, duty, good faith, corporate hospitality.
- 5.4.2 Offering employment to a relative, payment or reimbursement of travel expenses.
- 5.4.3 Wrongdoing of authority or those in power through means that are illegitimate, immoral or incompatible with ethical standards.

5.5 Charitable Donations

- 5.5.1 The Company may make charitable donations that are legal and ethical under local laws and practices. It ensures that the charity or a support is for a legitimate cause, and that donations are not being used as a channel for Bribery.
- 5.5.2 Any Stakeholder may also, in their personal note, can make donations that are legal and ethical under local laws and practices. However, it must be ensured that charitable contributions are not used as a scheme to conceal Bribery.

5.6 Political Contributions

- 5.6.1 Company does not make contributions to any political party or politicians. Stakeholders must not use company's name or trademark for political activities of any kind or provide money or other forms of support to political parties on behalf of the company.

6.0 Adherence as an Employee

- 6.1 Every employee must ensure that he / she shall read, understand and comply with Anti-Bribery & Anti-Corruption Policy. If any employee has doubts or concerns, he / she should contact his / her Manager or Head of the Department.
- 6.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the company or under the name of the company.
- 6.3 Employees are required to avoid any activity that might lead to or suggest a breach of this Policy.
- 6.4 Any employee who breaches this Policy shall face disciplinary action, which could result in imposition of fines or termination may be.

7.0 Reporting Violations

- 7.1 All employees are encouraged to raise concerns about any issue or suspicion of non-compliance with this Policy on tellus@pricol.com. If they are unsure whether a particular act constitutes Bribery or corruption, they should immediately contact the concerned Functional Head or Head-Human Resources.
- 7.2 Company aims to encourage genuine reporting of non-compliance and will support anyone who raises concerns in good faith under this Policy.
- 7.3 Company endeavors that no one suffers any detrimental treatment as a result of refusing to take part in Bribery or corruption, or because of reporting in good faith their suspicion of an actual or potential Bribery or other corruption related offence.
- 7.4 Company will investigate all allegations relating to corruption and Bribery and take legal or disciplinary action as may be deemed appropriate. All reports under this Policy would receive confidential treatment and the company would protect the identity of any person who reports a suspected violation.
- 7.5 Any use of the reporting procedures in bad faith or in a false or frivolous manner will be considered a violation of the code of conduct, and the reporter may be subject to disciplinary action, up to and including termination.