



Prasad & Company

(Project Works) Private Limited



ANTI-CORRUPTION

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



1.0 PURPOSE AND COMMITMENT

- 1.1 This Anti-Bribery and Anti-Corruption Policy (the "Policy") embodies a strict prohibition against bribery and corrupt practices in all business dealings conducted by **PRASAD AND COMPANY (PROJECT WORKS) PRIVATE LIMITED** (the "Company").
- 1.2 The Company commits to uphold the highest standards of integrity and compliance with all applicable anti-bribery and anti-corruption legislation, including but not limited to the Prevention of Corruption Act, 1988, and any relevant amendments or successor statutes.
- 1.3 This Policy aims to prevent any form of bribery or corrupt conduct by establishing clear responsibilities and procedures for all personnel and associated persons.

2.0 SCOPE

- 2.1 This Policy applies to all employees, whether permanent, temporary, fixed-term, contract, consultants, trainees, agents, intermediaries, subsidiaries, joint ventures, and any other third parties acting on behalf of or in association with the Company (collectively "Associated Persons").
- 2.2 For purposes of this Policy, "third parties" include clients, suppliers, distributors, contractors, advisers, business contacts, public officials, and any external entities engaged with the Company.

3.0 DEFINITIONS

- 3.1 "Bribery" shall mean the offering, promising, giving, accepting, or soliciting of any undue advantage, whether monetary or non-monetary, to influence a person in the performance of their public or private duties.
- 3.2 A "bribe" includes any gift, loan, fee, reward or advantage that is given to induce or influence the recipient's behavior unlawfully or unethically.
- 3.3 "Facilitation payments" refer to payments made to expedite or secure the performance of routine governmental actions and are deemed illegal under this Policy.

4.0 PROHIBITED CONDUCT

- 4.1 No Associated Person shall, directly or indirectly, offer, give, solicit, or accept any bribe, kickback, or facilitation payment.
- 4.2 The solicitation, acceptance, or receipt of any bribe or undue advantage is strictly prohibited irrespective of the local customs or practices.
- 4.3 Any gift or hospitality provided or received must comply fully with this Policy and be reasonable, proportionate, transparently disclosed, and not intended to influence business decisions improperly.



5.0 GIFTS, HOSPITALITY AND CHARITABLE CONTRIBUTIONS

- 5.1 Modest gifts and hospitality may be permissible provided they are bona fide, clearly documented, lawful, and consistent with customary business practices and applicable laws.
- 5.2 Gifts or hospitality offered to public officials or politically exposed persons require prior written approval from the Compliance Officer.
- 5.3 Charitable donations must be legal, ethical, documented, and not utilized as a conduit for bribery or undue advantage.

6.0 REPORTING AND WHISTLEBLOWING

- 6.1 All Associated Persons have an affirmative duty to report any knowledge or suspicion of bribery or corruption immediately to the designated Compliance Officer or through established whistleblowing channels.
- 6.2 The Company expressly prohibits retaliation against any person who reports concerns in good faith or refuses to participate in corrupt activities.
- 6.3 Reports will be treated confidentially, investigated promptly, and appropriate remedial or disciplinary actions will be taken.

7.0 COMPLIANCE AND ENFORCEMENT

- 7.1 Breaches of this Policy will be regarded as serious misconduct and may result in disciplinary action up to and including termination of employment or contractual relationships.
- 7.2 The Company will cooperate with law enforcement authorities in the investigation and prosecution of bribery offenses.
- 7.3 The Compliance Officer shall monitor and review the effectiveness of this Policy and ensure regular training and communication to all Associated Persons.

8.0 RECORD-KEEPING

- 8.1 Detailed and accurate records of all financial transactions, gifts, hospitality, and charitable contributions must be maintained in accordance with legal and regulatory requirements.
- 8.2 Records must be sufficient to demonstrate compliance and disclose any irregularities or deviations from this Policy.



9.0 LEGAL OBLIGATIONS AND COMPLIANCE

- 9.1 The Company shall comply fully with all applicable anti-bribery and anti-corruption laws, statutes, regulations, and codes of practice relevant to its operations, including any amendments or newly enacted legislation.
- 9.2 All Associated Persons are legally bound to adhere to this Policy and any breach thereof may constitute a violation of criminal and civil law, exposing individuals and the Company to prosecution, fines, penalties, and other legal sanctions.
- 9.3 The Company reserves the right to immediately terminate any contractual or employment relationship where there is a breach of this Policy, without prejudice to any other legal remedies available.

10.0 INVESTIGATION AND COOPERATION

- 10.1 The Company shall investigate any suspected breach of this Policy promptly and thoroughly, utilizing appropriate internal or external resources as necessary.
- 10.2 Associated Persons are required to cooperate fully with any internal or external investigations, including providing truthful information and access to relevant documents.
- 10.3 Failure to cooperate with investigations may result in disciplinary actions, up to and including termination, as well as potential legal consequences.

11.0 GOVERNANCE AND ACCOUNTABILITY

- 11.1 The Board of Directors or equivalent governance body bears ultimate responsibility for overseeing the implementation and enforcement of this Policy.
- 11.2 The Compliance Officer is appointed as the designated authority tasked with managing anti-bribery compliance, conducting risk assessments, delivering training, and reporting breaches to senior management or relevant authorities.
- 11.3 Regular audits, reviews, and compliance checks shall be conducted to ensure ongoing adherence to this Policy and to identify and address any areas of risk or non-compliance.

12.0 LEGAL CONSEQUENCES OF NON-COMPLIANCE

- 12.1 Any person found to be engaging in bribery or corrupt practices may be subject to criminal prosecution under applicable law, which may result in imprisonment, fines, disqualification from holding company office, and confiscation of assets.
- 12.2 The Company may also face significant reputational damage, financial penalties, and exclusion from public or private contracts as a result of non-compliance.
- 12.3 The Company reserves the right to seek indemnification or legal redress from Associated Persons who cause damage to the Company through violations of this Policy.