

Anti-Bribery and Anti-Corruption Policy (ABAC)

1. Purpose

Prakash Transport Corporation (“the firm”) is committed to conducting all its business activities with the highest standards of integrity, transparency, and ethical conduct. This Anti-Bribery and Anti-Corruption Policy (“the Policy”) is adopted to ensure full compliance with all applicable laws and to reinforce the Company’s **zero-tolerance stance** towards bribery and corruption in any form.

2. Scope

This Policy applies to:

- All employees of Prakash Transport Corporation, including permanent, temporary, contractual, and part-time staff.
- Directors, managers, and senior leadership.
- All third-party representatives including agents, intermediaries, vendors, contractors, consultants, transport partners, and any individual or entity acting on behalf of the Company.

Compliance with this Policy is mandatory and non-negotiable.

3. Definitions

3.1 Bribery

Bribery involves offering, giving, receiving, or soliciting anything of value with the intention of influencing a decision, securing an improper advantage, or inducing improper performance of duties.

This includes but is not limited to:

- Cash or cash equivalents
- Gifts, hospitality, entertainment, or travel benefits
- Favors, services, or personal advantages
- Unofficial payments made to expedite routine processes (“facilitation payments”)

3.2 Corruption

Corruption refers to the abuse of entrusted power for private, personal, or commercial gain. It includes fraud, extortion, embezzlement, conflict of interest, misuse of authority, and unethical conduct.

4. Prohibited Conduct

The following practices are strictly prohibited at our firm Prakash Transport Corporation:

1. Offering, promising, giving, requesting, or accepting bribes.
2. Making facilitation payments, regardless of local norms or practices.
3. Providing gifts, hospitality, or donations with the intent to influence business outcomes.



4. Manipulating tender, procurement, transport allocation, or billing processes for personal gain.
5. Engaging intermediaries or agents to indirectly carry out bribery or unlawful arrangements.
6. Concealing or disguising improper transactions in financial records.

Any violation will result in strict disciplinary action, including termination and possible legal prosecution.

5. Gifts, Hospitality, and Entertainment

Prakash Transport Corporation recognizes that modest gifts or hospitality may occasionally occur to meet the legitimate needs of the business functions. However:

- All such exchanges must be reasonable, infrequent, and not intended to influence business judgment.
- Any gift or hospitality exceeding the Company's approved value limits must be declared and approved in advance.
- Cash or cash-equivalent gifts are **strictly prohibited**.
- Employees must avoid situations where acceptance could create a real or perceived conflict of interest.

6. Charitable Contributions and Sponsorships

All donations or sponsorships made in the firm's name shall:

- Be legal, transparent, and properly recorded.
- Not to be used as a substitute for bribery.
- Require prior approval of management.

7. Political Contributions

Prakash Transport Corporation does **not** permit political contributions in the firm's name unless expressly approved by majority of the Partners and fully compliant with the governing laws.

8. Record-Keeping and Financial Controls

The Company shall maintain accurate and complete financial records. Employees and representatives must ensure that:

- No transaction is recorded inaccurately or misleadingly.
- No undisclosed or unrecorded funds, assets, or accounts are maintained.
- All expenses related to agents, transport partners, or government interactions are documented transparently.

9. Third-Party Due Diligence

Before engaging any third-party representative, the firm shall:

- Conduct risk-based due diligence.
- Verify business reputation, compliance history, and ownership structure.
- Include anti-bribery clauses in all contracts where appropriate.

Third parties acting on behalf of Prakash Transport Corporation are required to comply fully with this Policy.

10. Reporting Violations

Employees and partners are encouraged and obligated to report any suspected or actual violation of this Policy through:

- The Compliance Officer
- The internal grievance or whistleblower mechanism
- A designated ethics reporting channel

Reports may be made anonymously and in good faith **without fear of retaliation**.

11. Training and Awareness

The Company will provide regular training and communication to ensure all employees understand their responsibilities under this Policy and the legal consequences of non-compliance.

12. Consequences of Non-Compliance

Violations of this Policy may result in:

- Disciplinary action, including termination of employment
 - Termination of business relationships with third parties
 - Civil or criminal prosecution under applicable anti-corruption laws
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13. Compliance with Laws

This Policy is guided by and complies with relevant international and Indian laws, including:

- The Prevention of Corruption Act, 1988 (India)
- The Companies Act, 2013



14. Review and Amendment

This Policy shall be reviewed periodically to ensure continued compliance with legal requirements and best practices. Any amendments will be circulated to all relevant stakeholders.

Sujeet Anja

