

PRASOL CHEMICALS LIMITED

(Formerly Known As Prasol Chemicals Private Limited)

Prasol House, Plot No.A - 17/2/3, TTC Industrial Area
Khairne MIDC, Navi Mumbai - 400710

Policy Adopted at the Administrative Committee Meeting:

2nd September 2022

Anti-Bribery and Anti-Corruption Policy

Anti-Bribery and Anti-Corruption Policy

Prasol Chemicals Limited (hereinafter referred to as Prasol) is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure all forms of bribery, corruption, and fraud are prevented. Prasol has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships we build with our employees. Prasol's long standing commitment is to adhere constantly to all laws relating to countering bribery and corruption in all the jurisdictions in which we operate in addition to our own "Anti-Bribery & Corruption Policy". We remain bound by local, national and other applicable laws at home and abroad.

Scope and Applicability

This policy applies to all employees, managers, and owners of Prasol, including temporary or contractual employees, including all its subsidiaries, affiliated companies and relevant third parties. In the context of this policy, the relevant third parties refer to any contractor, supplier, vendor, advisor, actual and potential clients, customers, suppliers, business contacts, individuals or organizations with whom the Company deals in connection with the business of the Company or otherwise. It also refers to agents, advisors, joint ventures, government and public bodies, representatives and officials thereof to the extent permitted in law. Employees must ensure that they do not become involved in any way in the payment of bribes.

This policy applies in all countries or territories where the Company operates. Where local customs, standards, laws or other local policies apply that are stricter than the provision of this policy, the stricter rules must be complied with. Provisions of this policy are in addition to local customs, standards, laws or other local policies which are in place against bribery and corruption.

Definitions

Bribery can be described as: giving or receiving anything from any person (usually money, a gift, loan, reward, favour, commission or entertainment), as an improper inducement or reward for obtaining business, employment or any other benefit. Bribes can therefore include, but are not limited to:

- gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses;
- payments, whether by employees or business partners such as recruiters, labour service providers or consultants; and
- other 'favours' provided to supervisors, such as making unwanted advances, payments or promises.
- Bribe also includes any term defined in any provision of law or in any statute of local, state and central authorities against bribery and corruption. It is not limited to the act of offering a bribe. If an individual to whom provisions of this policy applies is found on offering/receiving end of the



bribe, he/she shall be guilty of breach of this policy apart from breach of statutory provisions.

Gifts, Hospitality and Entertainment

This policy also prohibits offering/receiving any type of gifts, hospitality and consideration from/to any individual, corporate or a third party who somehow deals commercially with the Company so long as the giving/receiving of gift meets the following requirement:-

- It is not made with the intention of influencing the party/person to whom it is being given, to obtain any reward or the retention of a business advantage or as an explicit or implicit exchange of favours or benefits in any form.
- It is given in the name of the company, not in an individual name. It is not in the form of cash/cash voucher.
- Company books and records must properly record all gifts, identifying the value of the gift, the date the gift was given, and the name of the recipient.

An employee or member of his/her immediate family should not provide, solicit or accept gifts, favors, cash, kind, or any kind of benefit in any form from competitors, vendors, suppliers, customers or others that do business or intend to do business with Prasol. It is expected from every employee and his/her family members not to have any involvement, that could impair, or give the appearance of impairing, an employee's ability to perform his/her duties or to exercise business judgment in a fair and unbiased manner.

Unacceptable types of gifts include:

- a. cash and cash equivalents;
- b. service discounts not available to all people;
- c. gifts over the stipulated limit without approval; and
- d. favours or any form of hospitality or entertainment in return for, or in exchange for, business services or information or a business advantage. Such action may create an actual or perceived conflict of interest or may give the impression of anti-competitive behaviour.

Unacceptable types of entertainment include:

- a. entertainment in forums that would damage the Company's reputation;
- b. gifts, hospitality or entertainment of an inappropriate value or nature or at inappropriate venues; and
- c. gifts, hospitality or entertainment not designed to further the promotion, demonstration or explanation of the Company's products and services, or pursuant to the execution or performance of a contract between the Company and the Government Official.

Company support for public infrastructure, political contributions, sponsorship and other charitable contributions



a. Public Infrastructure

Support for the construction or provision of public infrastructure should normally only be an element in the project agreements themselves, forming part of the initial project contracts. Such negotiations should be open and transparent and should relate or bear some relation to the project, however indirect. An example might be the provision of a local school or water treatment facility to a community proximal to a mine site. Any such payments must be properly recorded in books and records. Care must be taken to ensure that projects are legitimate, not for the direct or indirect benefit of a government official.

b. Political Contributions

To the extent political contributions are deemed appropriate by Senior Management of the Company, they may only be:

- i. done in accordance with local and applicable laws;
- ii. made only after obtaining written authorization from the Chief Executive Officer;
- iii. be modest in amount;
- iv. made without an expectation of favorable treatment in return; and
- v. Reflected in an accurate and timely manner in books and records.

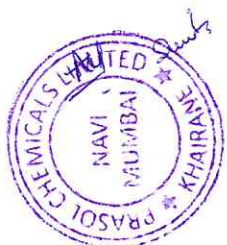
c. Sponsorship and Charitable Contributions

Any sponsorship or charitable contributions must be carefully examined by Senior Management to ensure they are legitimate and not covert instruments for activities that are otherwise inappropriate, to the benefit a Government Official, or illegal.

Prasol's Commitment

All employees of Prasol must adhere to the company ethos of bribery and corruption. No employee or manager will be allowed to take part or become involved in any form of bribery, corrupt behaviour, including the following:

- Offer, pay, or give anything of value to any person through which one will unethically gain something in return which is not provided for in terms of their employment contract.
- Attempt to mislead or induce any person to do something illegal or which goes against the company policy.
- Mislead or intentionally lie to any person to gain an advantage above and beyond their employment agreement.
- Violate any rules by shifting blame or responsibility onto another employee/person.
- Fraudulent practices against the company ethos or legislation.



- Prasol is committed to remove and combat any inappropriate behaviour immediately and will not tolerate such behaviour from employees, managers, or customers/clients in any way or form.
- Employees who make such payments are subject to appropriate disciplinary action by the Company, up to and including termination of employment, as well as to all penalties provided under applicable laws.
- Use of the Company's systems, facilities, resources and networks for illegal purposes, including the facilitation of corruption or money laundering, is absolutely prohibited.

This policy hereby binds the company to its commitment to regularly discuss and mitigate factors related to any form of bribery, corruption, or fraudulent behaviour.

Governance

The HR/HOD of the Company shall be overall responsible for ensuring that this policy complies with Prasol's legal and ethical obligations, and that all those under their control comply with the provisions of this policy.

HR/HOD of respective divisions have primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness however; this will not absolve an individual from compliance of provisions of this policy and applicable laws.

Amendment Of The Policy

The Company may, from time to time, review and update its policy and procedures based on learnings. HR/HOD will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified for strengthening this policy will be made as soon as possible. Therefore, this document is subject to modification. Provisions of this policy are in addition to all applicable laws and no way restrict, derogate or limit any provisions of law.

For Prasol Chemicals Limited



ms/t. n. l.
NRS
Director

