

ANTI-CORRUPTION POLICY OF PRISTINE LOGISTICS & INFRAPROJECTS PVT LTD AND ITS GROUP COMPANIES

The Policy

This document sets out the Policy of Pristine Logistics & Infraprojects on combatting corruption. It was endorsed by the Board of Directors of PLIPL on 23.12.2015 and applies to all subsidiaries / Group Companies.

All employees are required to comply with all applicable anti-bribery and corruption laws and regulations when doing business on behalf of the company.

The Policy consists of two Principles and a series of Practical Procedures to give effect to those Principles. The objective of the Policy is to clearly set out PLIPL's "Zero Tolerance" approach to corruption.

Definition

In this Policy "bribery" is defined as an intentional offer or monetary or other benefit to another person, official, organisation or company in order to secure or attempt to secure a benefit in the performance of a duty, to obtain or retain business, or to obtain any other improper advantage in conducting the Company's business.

Bribery can take different forms, such as cash payments, employment offers, bartering transactions, directing business to a particular individual or business, undue hospitality, providing services or other benefits to a person, organisation or company, or to those related to a particular person, organisation or company. Bribery can also take the form of facilitation or speed payments.

The Principles

1. PLIPL and its Group Companies will not pay nor accept bribes, kickbacks, or facilitation/speed payments ("corrupt payments"), either directly or via third parties, in any circumstances. Breaches or attempted breaches of this Principle by an employee will be regarded as an act of gross misconduct.
2. PLIPL and its Group Companies will seek to encourage an equivalent Policy in other entities with which it has a significant business relationship.

Practical Procedures

1. Responsible Person

PLIPL and its Group Companies will at all times have a nominated Director or senior manager responsible for overseeing and reporting on the implementation of this Policy.

The Director/senior manager will be sufficiently senior to be fairly regarded as independently minded.

The current Director of PLIPL Group Companies responsible for this role is Shri Durgesh Govil and can be contacted at +91-11-47235800, 46772223/24/27. In discharging this role he will

report to the PLIPL Board through another Director Shri Rajnish Kumar, who can be contacted at the same telephone numbers given above.

2. Review and Report

The Responsible Person will monitor, review and at least annually report on the effectiveness of and adherence to this Policy, and the steps taken to implement it. The report will be submitted for approval by the Board of Directors.

3. Senior Management Information

The senior management of PLIPL and its Group Companies will be kept informed of the steps taken to implement the Policy, the conclusions of any reviews and any material findings arising out of the work of the Responsible Person.

4. Internal Record Keeping

PLIPL and its Group Companies will ensure that records are maintained of such reviews and the consequent reports to the PLIPL Board.

5. Employee Conduct

Employees are required to report any knowledge or suspicions of the request for, offering, giving or receiving of a corrupt payment. A failure to do so may be considered gross misconduct.

No employee will suffer demotion, penalty or other adverse consequence for refusing to pay or accept a corrupt payment even if such a refusal may result in PLIPL and its Group Companies losing business or failing to win a deal.

6. Whistleblowing

PLIPL and its Group Companies are open to and regards the reporting of any instance of actual or attempted corruption as a legitimate example of "whistleblowing," and affirm that no employee will suffer demotion, penalty, or other adverse consequences for reporting corruption.

7. Internal Communication and Training

PLIPL and its Group Companies will communicate these Principles and Practical Procedures to all employees, and will reflect this Policy on its website and in the Employee Handbook/Code of Ethics.

Training will be provided to staff so that they are aware of this Policy, relevant anti-corruption legislation and their obligations under the Policy and their contract of employment.

Regular training will be provided to employees in particularly high risk roles.

8. Associates

PLIPL and its Group Companies will conduct screening procedures on agents, advisers, contractors, intermediaries, and other representatives who supply material goods and services to it ("Associates") to protect PLIPL and its Group Companies from the risk of them being associated with or benefiting from corrupt payments, and to ensure that the highest ethical standards are maintained.

PLIPL and its Group Companies require that Associates are made aware of this Policy and to confirm that they will not participate in any transaction that will put it in breach of the Policy, and that such Associates have adequate procedures for preventing their own staff engaging in the giving or receiving of bribes, kickbacks, or facilitation/speed payments.

9. Giving and receiving gifts

Employees are prohibited from accepting lavish gifts, incentives or gratuities or any gift where it could appear that their judgment regarding the Companies would be compromised.

Employees may accept gifts which are of a nominal value. All gifts, however small, must be reported to management and recorded. Where a gift is offered but refused, this must also be reported to management.

Employees may offer small business gifts (e.g. pens, diaries) to customers, suppliers and other persons, however all gifts must be reasonable, proportionate and authorised by management.

PLIPL and its Group Companies will record all gifts and corporate hospitality given and received by its staff, subject to a minimum threshold of Rs 5000/, in a Gifts & Hospitality Register. These records will be reviewed regularly by the Responsible Person.

10. Hospitality

Employees may accept hospitality that is reasonable in the context of the business, for example accompanying a business associate to a local cultural or sporting event, business meal or conference would in most cases be acceptable.

Hospitality that is lavish or frequent may appear to influence independent judgment on behalf of the Companies. Where an invitation appears inappropriate, the offer must be declined or the true value of the hospitality paid.

All invitations for hospitality should be discussed with and authorised by management. Employees may provide hospitality that is appropriate and reasonable in the context of the business. Employees must not provide hospitality without seeking approval and authority from management.

Applicable laws may prohibit the provision of hospitality, e.g. to government officials, therefore all local laws and regulations should be checked in advance.

11. Donations to organisations

No employee should make donations or contributions to any charity, political party or organisation without the express approval of senior management. No donations should be made with the intention of gaining a business advantage.

12. Auditing

The annual reports of PLIPL and its Group Companies internal and external auditors will include an assessment of the implementation of this Policy.

13. Reporting

The report and accounts of PLIPL and its Group Companies and the Agenda for the Annual General Meeting will include an assessment of the workings and effectiveness of this Policy.