PUKHRAJ ADDITIVES LLP

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

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1. Objective

Pukhraj Additives LLP is committed to conducting its business ethically, honestly, and with integrity. The Company has zero tolerance towards bribery, corruption, fraud, or any unethical business practice and is committed to complying with all applicable laws and regulations.

2.Scope

This policy applies to:

1. Directors and Partners.
2. Employees.
3. Trainees and Apprentices.
4. Contract workers.
5. Consultants.
6. Suppliers, Vendors, Contractors and Business Partners acting on behalf of the Company.

3. Policy

Employees and business partners shall not:

1. Offer, give, request, accept, or authorize any bribe, kickback, facilitation payment, commission, or any improper benefit.
2. Offer or accept gifts, hospitality, or entertainment that may improperly influence business decisions or create a conflict of interest.
3. Make improper payments to government officials or any other person to obtain business advantages.
4. Falsify records or conceal payments relating to Company business.
5. Engage in fraudulent, dishonest, or corrupt practices.

4. Gifts And Hospitality

Employees may exchange only modest gifts or business courtesies that are lawful, reasonable, infrequent, and do not influence or appear to influence business decisions.

Cash or cash equivalents shall never be offered or accepted.

Any gift, hospitality, or entertainment that may create a conflict of interest or exceed normal business courtesy shall be declined or reported to the Management.

5. Responsibilities

All employees shall:

1. Conduct business honestly and ethically.
2. Maintain accurate and transparent business records.
3. Immediately report any suspected bribery, corruption, fraud, or unethical conduct to the Reporting Manager, Human Resources Department, or Management.
4. Cooperate fully during any investigation.

The Company shall protect employees who report concerns in good faith from retaliation

6. Non-Compliance

Violation of this policy shall be treated as serious misconduct and may result in disciplinary action, including termination of employment or business relationship, recovery of losses where applicable, and reporting to appropriate authorities in accordance with applicable laws.

Approved By

Karina Nagpal
Managing Partner
Pukhraj Additives LLP