



Premier Road Carriers Limited
Business Code of Conduct (CoC)

Prepared By:		Approved By:	Issued By:
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Signature:			
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Business Code of Conduct (CoC)

Introduction

Premier Road Carriers Limited (PRCL) is committed to achieving and maintaining highest level of performance in the company. PRCL's Code of Conduct (CoC) applies to its employees as well as all vendors and sub-contractors. This Code supersedes all other codes, policies, procedures, instructions, practices, rules or written or verbal representations to the extent they are inconsistent. All business partners must undertake to adhere to the Values & Principles by which the company is guided under all circumstances.

- A. **Seeking Help:** The Code is not intended to be a comprehensive rulebook and cannot cover every issue or situation you may face as an employee or otherwise. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company's ethical standards, please seek help.

We encourage you to contact your supervisor for help first. If your supervisor cannot answer your question, or if you do not feel comfortable contacting your supervisor, please contact the HR Department. You may also seek help from or submit information to the Company by writing to the Company at the email address info@prclimited.co.in. If you have any questions, you can contact the Legal Department to clear your doubts.

- B. **Reporting Violations/ Whistle Blower:** Each employee is responsible for ensuring that his or her conduct and the conduct of anyone reporting to the employee fully complies with the policies governing the Company's business dealings. All employees have a duty to report any known or suspected violation of this Code, including any violation of the laws, rules, regulations or policies that apply to the Company.

If you know of or suspect a violation of this Code, immediately report the conduct to your supervisor. Your supervisor will contact the Secretarial / Legal Department, who will work with you and your supervisor to investigate your concern. If you do not feel comfortable reporting the conduct to your supervisor or you do not get a satisfactory response, you may contact the Secretarial / Legal Department directly.

Report known or suspected violations of the Code using any of the following means:

Email: info@prclimited.co.in

Mail Address: 901-B Dalamal Towers Nariman Point Mumbai-400021.

Employees submitting this information need not leave their name or other personal information and reasonable efforts will be made to conduct the investigation that follows from the report from an employee in a manner that protects the employee's identity.

All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Your supervisor, the Secretarial / Legal Department and the Company will protect your identity to the extent possible, consistent with law and the Company's need to investigate your concern.

A Copy of this Code of Conduct should be Accepted & Signed by each employee, stakeholder of the company and abide by it.



The following CoC sets forth our expectations regarding all our Employees & Business Partner's practices:

1. Compliance with laws, rules & regulations

PRCL and its business partners are bound by the law. Compliance with all applicable laws and regulations must never be compromised. Additionally, employees/partners shall adhere to internal rules and regulations as they apply in a given situation. Those internal rules are specific to the Company and may go beyond what is required by the law.

2. Fair Business Practices

To meet social responsibilities, business partners are expected to conduct their business in an ethical manner and to act with integrity. Ethical requirements includes the following aspects:

- a. **Business Integrity:** Our employees/partners must operate with honesty and integrity. You must not engage in offering any form of bribery, paying kickbacks/ facilitation payments, any form of incentives or giving anything of value to secure an unfair advantage, whether in dealings with government officials, political parties, or individuals in the private sector. Partners are expected not to offer PRCL Employees with any gifts or other kind of personal benefits, loans, favour etc. In case if you receive any such request, you are required to report the same.
- b. **Conflict of Interest:** All Employees of the Company will not engage in any activity that interferes with your performance or responsibilities to the Company or is otherwise in conflict with or prejudicial to the Company. Our policies prohibit any employee from accepting simultaneous employment with a Company supplier, customer, developer or competitor, or from taking part in any activity that enhances or supports a competitor's position. Employees must not conduct company business with a relative, or with a business in which a relative is associated in any significant role. Your specific involvement with a competitor, supplier, employee of the Company, creates an actual or potential conflict of interest. An employee involved in any such relationship or situation described in this policy should immediately and fully disclose the relevant circumstances to the appropriate supervisor. The Company may take corrective action based on whatever appears appropriate, according to the circumstances.
- c. **Fraud or Malpractices:** Fraud is an intentional act committed to secure unlawful or illegal gain or causing unlawful or illegal loss. It can damage the Company's reputation for integrity. STL is committed to the elimination of fraud, to the rigorous investigation of any suspected cases of fraud, and where fraud or other criminal act is proven, to ensure that wrong doers are appropriately dealt with.
- d. **Prohibition of Child Labour:** Partners must provide a workplace free from discrimination, harassment, or any type of abuse to its employees. PRCL prohibits the use of child labour in any of their operations. All forms of forced or compulsory labour, such as prison labour, bonded labour, or indentured labour, are forbidden in any operations. Forced overtime and human trafficking are also strictly prohibited.
- e. **Collusion or Anti-Competition:** No employee, agent or contractor shall at any time or under any circumstances enter into an agreement or understanding, written or oral, express or implied, with any competitor concerning prices, discounts, other terms or conditions of sale, profits or profit margins, costs, allocation of product or geographic markets, allocation of customers, or even discuss or exchange information on these subjects.
- f. **Data Privacy:** The Company's confidential information includes but is not limited to product design; product plans, inventions, manufacturing process lists of customers pricing, pricing policy, discount schemes, budgets, financial information and results, expansion/diversification plans and corporate restructuring plans. This information is the property of the Company and may be protected by patent, trademark, copyright and trade secret laws. All confidential information must be used for Company



business purposes only. Every employee and agent/contractor with whom confidential information is shared must safeguard the confidential information.

- g. **Equal Opportunities:** PRCL shall provide equal opportunities to all its employees/vendors and all qualified applicants for employment without regard to their race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. Human resource policies shall promote diversity and equality in the workplace, as well as compliance with all local labour laws, while encouraging the adoption of international best practices.

3. Whistle blower Policy

Whistle Blower Policy is framed to enable employees to raise their concerns about any malpractice, impropriety, abuse or wrongdoing at an early stage and in the right way, without fear of victimization, subsequent discrimination or disadvantage.

This policy is intended to assist employees who believe they have discovered malpractice, impropriety, abuse or wrongdoing. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters, which have already been addressed pursuant to disciplinary or other procedures of the Company. The Company will protect the confidentiality and anonymity of the complainant to the fullest extent possible with an objective to conduct an adequate review.

Email on: complaints@prclimited.co.in

Mailing Address: 901-B Dalamal Towers Nariman Point Mumbai Point 400021.

4. Environment, Health & Safety

PRCL, its employees & its Partners shall strive to provide a safe, healthy, clean and ergonomic working environment for its people. All Partners must abide by the Guidelines set under the Integrated EHS Manual of the Company.

- a. Environment: PRCL is committed to protecting the environment, and environmental responsibility is at the core of how we operate. Business partners shall develop, implement, and maintain environmentally responsible business practices
- b. Health & Safety: Workers health and safety well-being is important to PRCL. Partners shall provide and maintain a safe work environment and integrate sound health and safety management practices into their business.

Document Management Information

Version No.	Version date	Author	Reviewed By	Approved By	Changes
0.0	01.08.2023	Ms. Archana Gogri	Mr. Yashu Gupta	Mr. Yashu Gupta	Draft
1.0	12.09.2023	Ms. Archana Gogri	Mr. Yashu Gupta	Mr. Yashu Gupta	Initial Document