

RAILWAY CONSTRUCTION PAKISTAN LIMITED (RAILCOP)

ANTI-CORRUPTION POLICY

1. ABOUT THIS POLICY:

It is the policy of Railway Constructions Pakistan Limited to conduct all of the works in an honest and ethical manner. RAILCOP takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all our business dealings and relationships and in the promotion of the Global Goals.

Any RAILCOP employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee i.e., Contractor, Suppliers, Services Provider, Consultants, Bankers, Financial/Non-financial Institution, other government or Private Institution in business with RAILCOP who breaches this policy (or the company may have reasonable suspicion to believe this is the case) may have their contracts/Business deal be terminated with immediate effect.

This policy does not form part of any employee's contract of employment or contracts with other than employees and we may amend it at any time.

2. COMPLIANCE WITH THE POLICY:

This policy applies to all persons working for RAILCOP or on behalf of RAILCOP in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. DEFINITION OF BRIBERY:

Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise or report it with your Management who shall proceed further through investigation and legal proceedings in accordance with the Rules & Regulations and law, if required or deemed necessary to ensure transparency.

Specifically, you must not:

- a. Give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- b. Accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or

RAILWAY CONSTURICONS PAKISTAN LIMITED (RAILCOP)

- c. Give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- d. Threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

4. GIFTS AND HOSPITALITY:

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining company's image or reputation, or promoting the Global Business Goals.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in the name of company (RAILCOP) not in your own name.

Promotional gifts of low value such as merchandise may be given to our existing suppliers and business partners and we can accept equivalent gifts from them.

5. RECORD-KEEPING:

RAILCOP must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

6. HOW TO RAISE A CONCERN:

If the employees are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your management through proper channel as soon as possible.

7. PROCEEDINGS:

The Board and the Management of RAILCOP shall address all the Anti-corruption cases through the Constituted Committees from time to time in accordance with Rules & Regulations and above policy.