

01. ANTI-BRIBERY & CORRUPTION POLICY

1. Introduction

Transol Logistics is committed to conducting business ethically and with integrity. This Anti-Bribery and Corruption Policy (the "Policy") outlines our commitment to prevent bribery and corruption in all our business dealings and interactions. We expect all employees, officers, directors, contractors, and agents to comply with this Policy to maintain the highest standards of transparency and accountability.

2. Policy Statement

Bribery and corruption are serious criminal offenses. Transol Logistics prohibits any form of bribery, whether direct or indirect, in its dealings with clients, suppliers, government officials, business partners, or any other third parties. This includes offering, giving, receiving, or soliciting anything of value to influence business decisions or gain an improper advantage.

3. Definitions

- **Bribery** refers to the offering, giving, receiving, or soliciting of a financial or other advantage to influence the actions of a person in a position of trust.
- **Corruption** refers to the abuse of entrusted power for personal gain, including bribery, kickbacks, or fraud.

4. Key Principles

- **Zero Tolerance for Bribery:** Transol Logistics has a zero-tolerance policy towards bribery and corruption. We will not tolerate bribery in any form, whether in dealings with government officials, clients, suppliers, or other third parties.
- **Gifts and Hospitality:** While the exchange of modest gifts or hospitality may be part of normal business practices, these must never influence business decisions or create a conflict of interest. Any gift or hospitality offered or received should be proportionate, transparent, and compliant with applicable laws.
- **Third-Party Relationships:** We expect our business partners, suppliers, and agents to share our commitment to this Policy. Transol Logistics will conduct due diligence to ensure that third parties comply with anti-bribery and anti-corruption laws.
- **Facilitation Payments:** Facilitation payments, which are small bribes paid to expedite routine governmental actions, are strictly prohibited by Transol Logistics.

5. Responsibilities of Employees

All employees must:

- Comply with this Policy at all times.
- Immediately report any suspected or actual instances of bribery or corruption.
- Ensure that any gifts, hospitality, or other benefits provided or received are reasonable, proportionate, and necessary.
- Avoid any conflicts of interest or the appearance of a conflict of interest in their dealings with third parties.

6. Reporting Concerns

Employees and other stakeholders are encouraged to report any concerns or suspicions related to bribery or corruption. Reports can be made through the following channels:

- Direct reporting to the Human Resources Department or Compliance Officer.
- An anonymous whistleblowing hotline or online reporting system (if applicable).

All reports will be treated confidentially and investigated promptly. Retaliation against anyone who reports a concern in good faith will not be tolerated.

7. Training and Awareness

Transol Logistics will provide regular training to employees on anti-bribery and anti-corruption laws, recognizing and responding to potential bribery risks, and the company's expectations and obligations under this Policy.

8. Due Diligence

Transol Logistics will conduct thorough due diligence on business partners, suppliers, agents, and third parties before entering into any relationship. This will include assessing the potential risk of bribery or corruption in any transactions, joint ventures, or partnerships.

9. Consequences of Non-Compliance

Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment, legal action, and potential criminal prosecution. Transol Logistics takes violations of this Policy seriously and will cooperate fully with authorities in any investigations.

10. Compliance with Laws

This Policy is designed to comply with all applicable local, national, and international anti-bribery and anti-corruption laws, including but not limited to the UK Bribery Act 2010, the US Foreign Corrupt Practices Act (FCPA), and any relevant regulations in the jurisdictions where Transol Logistics operates.

11. Review and Amendments

This Policy will be reviewed periodically and may be amended as necessary to ensure it remains in line with applicable laws and best practices. Employees will be notified of any significant changes to the Policy.

By adhering to this Anti-Bribery and Corruption Policy, we are ensuring that Transol Logistics operates with the utmost integrity and in compliance with all applicable legal requirements. We are committed to creating a transparent and ethical business environment for all stakeholders.

Approved by:

Manish Leel

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