

Anti-Fraud Programme: (Eagle Cabs India Pvt. Ltd.)

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This document sets out the policy and procedures of Eagle Cabs India Pvt. Ltd. against fraud and other forms of dishonesty, together with the steps that must be taken where any of these practices is suspected or discovered. It applies to Directors, staff and volunteers. Anybody associated with Eagle Cabs India Pvt. Ltd. Who commits fraud, theft or any other dishonesty, or who becomes aware of it and does not report it will be subject to appropriate disciplinary action.

Incident response plan

An employee who discovers or suspects fraudulent activity will contact the HR department immediately and report the same. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Investigations Unit or the Legal department. No information concerning the status of an investigation will be given out. Under no circumstances should any reference be made to "the allegation," "the crime, the fraud," "the forgery," "the misappropriation," or any other specific reference.

The reporting individual should be informed of the following:

- •Do not contact the suspected individual in an effort to determine facts or demand restitution.
- • Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Legal Department or the Company.

What should be reported

Concerns which should be reported include, but are not limited to staff/Council Members/Associates or others committing or attempting to commit:

- Any dishonest or fraudulent act.
- Forgery or alteration of documents or accounts.
- •Misappropriation of funds, supplies or other assets.

Post investigation of the fraud activity, a report will be released by the investigating team/HR department to the management siting details of the fraudulent active or irregularity'. This report or any other similar instances will be tracked and maintained by the HR department. Any impacted internal/external clients will be informed by Management or HR department with relevant details within 24 hours

Controls

It is the responsibility of the management to establish and maintain systems of internal control and to assure themselves that those controls are properly applied as intended.

The controls include __

- a. internal Audit must be conducted in every month to extract vendors from the system with addresses, tax IDs, or contact numbers that match employee's / subcontractors'
 - b. External auditors must perform extensive audit on payments to vendors and documentation / compliance of sub-vendor.
- c. Periodical Management Review must be conducted on overall payments and performance of employees/sub-vendors on monthly basis.
- d. Awareness sessions and reiteration of our internal policies to all employees to ensure, they are aware or the types of fraud, the reporting procedure and how to prevent.