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1. PURPOSE

Carrier Wheels Pvt. Ltd. ("CWPL") is committed to conducting business with integrity, transparency, and accountability.
This Policy establishes CWPL's approach to preventing, detecting, and responding to fraud, financial misconduct, and money laundering activities in all business operations.

2. SCOPE & APPLICABILITY

This Policy applies to:

- All employees (permanent, probationary, contractual, temporary)
- Management, supervisors, trainees, and associates
- Any individual or third party acting on behalf of CWPL

Compliance with this Policy is mandatory.

3. POLICY STATEMENT

CWPL adopts a zero-tolerance approach towards:

- Fraud
- Financial misrepresentation
- Theft or misuse of company assets
- Money laundering or suspicious financial transactions

All business activities must be conducted in a lawful, transparent, and ethical manner.

4. DEFINITION OF FRAUD & MONEY LAUNDERING

Fraud includes, but is not limited to:

- Falsification or manipulation of records
- Misappropriation of funds or assets
- Unauthorized payments or reimbursements
- Collusion with suppliers, customers, or employees
- Abuse of authority for personal gain

Money laundering refers to:

- Concealing or disguising the origin of illegally obtained funds
- Engaging in transactions intended to legitimize unlawful proceeds

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5. PROHIBITED ACTIVITIES

Employees shall not, directly or indirectly:

- Engage in fraudulent accounting or false reporting
- Create or approve fake invoices, expenses, or documents
- Accept or process unexplained or suspicious payments
- Facilitate or ignore money laundering activities
- Circumvent internal financial controls

6. FINANCIAL CONTROLS & RECORD KEEPING

CWPL ensures:

- Accurate and complete financial records
- Proper authorization for payments and transactions
- Segregation of duties where feasible
- Retention of financial documents as per statutory requirements

All transactions must be supported by valid documentation.

7. DEALING WITH SUPPLIERS, CUSTOMERS & THIRD PARTIES

Employees must:

- Conduct business only with legitimate and identifiable entities
- Avoid cash-based or unusual payment arrangements
- Follow established approval and procurement procedures

Suspicious transactions must be reported immediately.

8. ANTI–MONEY LAUNDERING MEASURES

CWPL takes reasonable steps to:

- Monitor financial transactions for irregularities
- Ensure payments are made through authorized banking channels
- Avoid dealings with entities involved in unlawful activities

CWPL complies with applicable laws relating to prevention of money laundering.

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9. REPORTING & WHISTLEBLOWING

Employees are encouraged to report:

- Suspected fraud or financial misconduct
- Irregular accounting practices
- Suspicious financial transactions

Reports may be made through established grievance or whistleblower mechanisms.

All reports will be treated confidentially.

10. PROTECTION AGAINST RETALIATION

CWPL strictly prohibits retaliation against any employee who reports concerns in good faith or assists in an investigation.

11. INVESTIGATION & ACTION

- All reported concerns will be reviewed promptly
- Investigations will be conducted fairly and objectively
- Appropriate corrective and disciplinary actions will be taken
- Legal action may be initiated where required

12. DISCIPLINARY ACTION

Violation of this Policy may result in:

- Disciplinary action, including termination
- Recovery of losses
- Legal proceedings under applicable laws

13. AWARENESS & TRAINING

- This Policy shall be communicated to employees
- Awareness may be provided through induction or internal communication
- Employees are responsible for compliance

14. REVIEW & CONTINUOUS IMPROVEMENT

This Policy shall be reviewed periodically to:

- Ensure legal compliance
- Strengthen internal controls
- Address emerging risks

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15. APPROVAL & EFFECTIVE DATE

This Fraud Prevention & Anti–Money Laundering Policy is approved by the Management of Carrier Wheels Pvt. Ltd. and is effective from the date of issue.

	Name/Designation	Signature	Remarks for Revision
Prepared By:	Amit Saroha Deputy Manager		
Approved by:	Apoorva Jain Director		