

JAI CORP LIMITED

Anti - Bribery & Anti - Corruption Policy

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Background/Preamble:

Jai Corp Limited (hereinafter referred to as “the Company” or “Jai Corp” or “We” or “Our” or “Us”) is into manufacturing businesses such as plastic processing and steel. Jai Corp is committed to uphold the highest moral, legal, and ethical standards in all its business operations. The Company strictly prohibits any form of bribery or corruption. It is mandatory for all employees to comply with the anti-bribery and anti-corruption laws at the state level and in all relevant jurisdictions where the Company operates. This Policy is consistent with the Company's code of conduct and internal policies, as well as with the Prevention of Corruption Act, 1988, and the Indian Penal Code, 1860.

Purpose:

The objective of this Policy on Anti-Bribery and Anti-Corruption is to establish robust procedures that prevent our Company from engaging in any activities associated with bribery, facilitation payments, or corruption, regardless of whether such involvement is intentional or unintentional. By implementing these procedures, we aim to safeguard the integrity of our Company and maintain a strong stance against any form of bribery or corruption.

Coverage:

This Policy is applicable to the Company at all its factories and offices.

Definition:

“**Bribe/Bribery**”: Act of giving, promising, offering of money, favor or something valuable to a person or authorizing such an act in order to influence the judgment or conduct of that person, procure services, or gain influence. A bribe may be monetary or non-monetary, tangible or intangible.

“**Corruption**”: A form of dishonesty or a criminal offense which is undertaken by a person or an organization which is entrusted with a position of authority, in order to acquire illicit benefits or abuse power for one's private gain. Proposing an advantage with an improper purpose is already a corruption, even if it was never acted upon. Active corruption consists of offering an advantage. Passive corruption consists of accepting an advantage.

“**Facilitation payments**”: Money provided to government authorities to facilitate or expedite a service that the payer is legally entitled to.

Commitment:

The purpose of this Anti-Bribery and Anti-Corruption Policy ("Policy") is to address the complexities faced by our Company as it expands its presence in various jurisdictions. These complexities arise from engaging in transactions and projects that involve interactions with multiple individuals and organizations where bribery, corruption, kickbacks, and facilitation payments are perceived as customary business practices. It is imperative that all employees understand that they are strictly prohibited from engaging in any behavior explicitly prohibited by anti-corruption legislation, and they must exercise their judgment to avoid any actions that could even give the appearance of corruption.

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Our Company maintains a zero-tolerance approach towards bribery in any form. We unequivocally prohibit the offering, provision, or authorization of bribes, including facilitation payments, to public officials, private individuals, or any other entities. Bribes can manifest in various ways, such as:

- Transactions involving payments of money outside the normal course of business.
- Offering or accepting gifts or entertainment.
- Involvement in rebates or kickbacks related to services provided.
- Unauthorized use of assets at a discounted or free-of-charge rate.
- Sponsorships, charitable contributions, political contributions, and community investments.

It is important to note that customary business hospitality is not prohibited by this Policy, provided that it is reasonable, appropriate, modest, and serves bona fide corporate purposes, such as enhancing our Company's reputation, presenting our services, or fostering positive relationships.

Furthermore, under specific circumstances, the giving or receiving of gifts or discounts may be acceptable if they possess low intrinsic value, are part of ordinary business practices without exerting any influence over the recipient, and do not involve any promises that confer undue advantages.

Any political contributions made by or on behalf of the Company, as well as any solicitation for political contributions, must be conducted in full compliance with the Companies Act and our Company's policies, ensuring their lawfulness and adherence to relevant regulations.

Risk Management:

In order to effectively manage the risk of bribery and corruption, the Company implements comprehensive controls pertaining to interactions with public officials, business partners, and third parties. Additionally, the Company maintains oversight over the offering and receiving of gifts, entertainment, sponsorships, donations, political contributions, and record-keeping practices. Vigilance towards bribery and corruption red flags is emphasized, and any identified issues are promptly reported to the Compliance Committee as required.

Company's Approach:

The Company is fully committed to combatting bribery and corruption at the highest level. Each employee is expected to adopt a zero-tolerance approach towards all forms of corruption, including bribery, kickbacks, and facilitation payments. To prevent corruption, employees are required to adhere to the following principles:

- Never offer, pay, request, facilitate, or accept bribes or kickbacks, even if instructed by a senior manager.
- Never authorize or condone any form of corrupt activities or behaviors.
- Never ignore potential corrupt behavior by subordinates or business partners acting on behalf of the Company.
- Never engage in activities that could facilitate corruption, such as drafting illegal agreements, creating fraudulent claims, falsifying evidence, or providing false testimony in legal proceedings.

Consequence of Non-Compliance:

Non-compliance with this Policy may result in significant sanctions and potential criminal liability for the Company, management, and involved personnel, depending on the severity and frequency of the breach. Disciplinary actions for non-compliance can range from warnings to termination of employment, and civil or criminal proceedings may be pursued in accordance with applicable laws.

Transparency:

Every member of the workforce is responsible for accurately recording and reporting expenditures related to gifts or travel in accordance with the prescribed procedures. Failure to reflect a payment or transaction in the Company's records in a manner that transparently represents its nature and purpose may be considered a violation of the law.

Communication of the Policy:

The Policy shall be communicated to all Jai Corp Stakeholders by providing them with access to this Policy. Further:

- Jai Corp shall strive to conduct awareness sessions for all the Stakeholders covered under this Policy.
- The Policy shall be easily accessible on the Company's website.

Any non-compliance with this Policy may be communicated to the Company
Over Phone - (+91-22) 35215146/ 31396050
Through e-mail - jaicorp@jaicorpindia.com
Through Post - The Managing Director, #603, Embassy Centre, Nariman Point, Mumbai – 400 021.

Review and Approval:

Jai Corp's top management has a strategic role in the full implementation of this Policy ensuring the involvement of all personnel and of those who collaborate with Jai Corp, and the consistency of their behavior with the values embodied in this Policy.

Applicability:

This Policy, duly approved by the Board of Directors on 11th August.2023, shall be applicable with effect from the 11th day of August, 2023 and future amendments / modifications shall take effect from the date stated therein.