



JUPITER WAGONS LIMITED

CIN: L28100MP1979PLC049375

**Anti-Bribery and Anti-Corruption
Policy**



1. Preface

Jupiter Wagons Limited (also referred to as “JWL” and “the Company”) is committed to conduct business with the highest standards of integrity, transparency, and ethical conduct. This Anti-Corruption and Anti-Bribery Policy (also referred to as “the policy” and “this policy”) outlines the zero-tolerance approach to corruption and bribery in all its forms. The policy ensures compliance with the Prevention of Corruption Act, 1988, and other applicable anti-corruption laws while establishing clear guidelines for ethical business conduct.

2. Scope

This policy applies to:

- All employees of Jupiter Wagons Limited, regardless of position or seniority
- Board of Directors
- Contract workers, consultants, and temporary staff
- Third-party representatives, including suppliers, distributors, and agents
- Any individual or entity acting on behalf of Jupiter Wagons Limited

3. Key definitions

- **Bribery:** The offer, promise, giving, demand, or acceptance of an undue advantage as a reward or inducement for improper performance. Bribes can include money, gifts, entertainment, hospitality, services, or favours provided to influence a business or government decision.
- **Corruption** refers to dishonest, improper, and often unlawful behaviour by an individual or organization in a position of authority, aimed at securing illicit benefits or abusing power for personal gain.
- **Undue advantage:** Any benefit, gift, or favour beyond lawful remuneration or benefit. The Prevention of Corruption Act states that “gratification” is not limited to monetary benefits and includes any advantage that could influence a decision.
- **Public official:** Any person involved in government duties, whether elected or appointed, including employees of government-controlled corporations or agencies.
- **Facilitation payments:** Small, unofficial payments made to expedite routine actions (e.g., processing documents or permits). The Company prohibits facilitation payments except under circumstances where refusal might lead to harm, coercion, or significant safety risks.
- **Third party:** Any individual or organization engaged with the Company, including clients, vendors, agents, intermediaries, and other business contacts.

4. Prohibited acts

JWL explicitly prohibits the following:

- **Bribes and kickbacks:** The company strictly prohibits any form of bribery or corrupt practices in its operations. This prohibition applies to dealings with both public officials and private individuals or entities. Any action involving the giving, offering, receiving, or soliciting of gifts, hospitality, loans, fees, rewards, or any other benefits aimed at inducing or rewarding improper conduct is strictly forbidden. This includes but not limited to:
 - ✓ **Dishonest or unethical behaviour:** Any action that compromises integrity, breaches trust or contravenes legal or ethical standards in the performance of duties—whether in public office, private employment, or business-related activities.
 - ✓ **Influencing public officials:** Offering or promising gifts, hospitality, financial incentives, or any other advantage to a government official with the intention of affecting their decisions or actions to gain an unfair business edge.
 - ✓ **Indirect involvement in corruption:** Bribery is not limited to direct involvement. The use of intermediaries, associates, or third parties to carry out, facilitate, or enable any of the practices outlined above is equally prohibited.

The organization is committed to conducting its operations in a lawful and ethical manner and expects all stakeholders to uphold integrity in their interactions. The organization strictly forbids the giving or receiving of facilitation payments or "kickbacks" under any circumstances to obtain favours or expedite official processes.

- ✓ Facilitation payments refer to unofficial, typically small payments made to hasten routine actions performed by officials.
- ✓ Kickbacks are payments provided in exchange for business favours or undue advantages.
- **Corruption:** All personnel associated with the organization are strictly prohibited from engaging in any form of corrupt activity, whether directly or indirectly, personally or through third parties. This includes, but is not limited to:
 - ✓ Offering, providing, or promising financial payments, services, or other advantages to simplify administrative, bureaucratic, or formal processes.
 - ✓ Requesting, receiving, or accepting such payments, services, or advantages from any individual, organization, or entity, including government bodies, local authorities, government officials, private enterprises, and their representatives.



- **Gifts and hospitality**

While the exchange of gifts and hospitality can foster good business relationships, they must never influence, or appear to influence, business decisions. All gifts and hospitality must be:

- ✓ Reasonable and proportionate.
- ✓ Not intended to secure an improper advantage.
- ✓ Compliant with local laws and JWL's internal policies.

Employees must seek approval from their department head before offering or accepting any gift or hospitality that exceeds a nominal value.

- **Political and charitable contributions**

JWL does not make donations to political parties, organizations, or individuals engaged in politics to gain a business advantage. Charitable contributions are permitted but must be:

- ✓ Legal and ethical.
- ✓ Approved by the appropriate authority within JWL.
- ✓ Transparent and accurately recorded in JWL's books and records.

5. Implementation and monitoring

Employees are encouraged to report any suspected instances of bribery or corruption promptly to the Head of the Department or Compliance Officer. All reports will be kept confidential, and anonymous reporting is permitted. We ensure protection for individuals reporting concerns and provides training on anti-bribery and anti-corruption laws to uphold compliance and ethical standards.

The organization is committed to investigating all allegations of bribery and corruption thoroughly and impartially. Appropriate legal or disciplinary measures will be taken based on the findings of the investigation.



6. Amendments

This Policy shall be reviewed and evaluated as and when required to establish and confirm that it meets the objectives of the relevant legislation and remains effective. The Board has the complete right to make amendments to this Policy in whole or in part, at any point of time without assigning any reason, whatsoever.

7. Acknowledgement and reporting of violations

Every Designated Person, both current and future, shall formally acknowledge receipt of this Anti-Bribery and Anti-Corruption (ABAC) Policy, including any modifications or updates, using the acknowledgment form annexed as Appendix - I to this Policy. The signed acknowledgment must be submitted to the Compliance Officer within the stipulated timeframe.

Jupiter Wagons Limited is committed to addressing all violations with transparency and diligence, ensuring adherence to the highest ethical and legal standards.



Appendix - 1

Acknowledgment Form

I hereby acknowledge that I have received and read the ABAC (Anti-Bribery and Anti-Corruption) Policy of JWL. I understand the provisions and ethical standards embedded in the policy and commit to adhering to its principles and guidelines.

Signature:

Name:

Designation:

Date:

Place: