



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Jindal Worldwide Limited strives to be a world-class solutions provider, a good employer and a responsible corporate citizen. The company is committed to conducting business in a transparent and fair manner while creating a positive impact on the society.

OBJECTIVE:

Jindal's Anti-Corruption and Bribery Policy outlines the Company's zero-tolerance approach towards bribery and corruption. The objective of this policy is to put appropriate anti-corruption and anti-bribery guidelines in place across all our operations globally and thus ensure zero violation of relevant laws and regulations.

POLICY:

Bribes, Kickbacks, and Other Payments:

Jindal's anti-bribery laws cover each of its employees or associates working on behalf of the company. The company's business decisions must not be influenced by corrupt practices. Corruption may refer to any act of payments or exchange of goods of any value and includes activities such as bribery and exchange of kickbacks.

Jindal strictly prohibits any act of offer, promise, grant, authorization, demand, or acceptance of any promise, bribe, kickback, illegal gratuity, illegal payment, or other illegal goods and services of any value directly or indirectly, to or from any person, organization, or government representative.

Our anti-bribery and corruption policy extends to all third parties, working for the Company. The Company also does not hire third parties to conduct any act of corruption or bribery on its behalf. Third parties acting on behalf of Jindal are prohibited from offering or accepting any bribe on the Company's behalf. Third parties include but are not limited to consultants, subcontractors, sales agents, resellers, customs brokers, accounting or law firms, etc.

Political Contributions:

Jindal does not make contributions to any political party or politicians. Any Jindal employee who wishes to make a political contribution in his or her personal capacity, must ensure that he or she does not imply it to be a contribution made on behalf of the Company.

Charitable Donations:

Jindal may make charitable donations that are legal and ethical under local laws and practices. It ensures that the charity or a support is for legitimate cause and that donations are not being used as a channel for Bribery.

Gifts and Entertainment:

Employees / Associates are prohibited from providing gift or entertainment to customers, prospects, government officials or their family members when such expenses are not incurred while conducting company business and / or do not satisfy the guidelines enumerated in this policy and other related policies.

Reasonable and appropriate hospitality is not prohibited. The Company acknowledges the exchange of nominal gifts or souvenirs of a nominal value (eg. Bouquets, pens, calendars, diaries, etc.) which are customarily given on special events / occasions and are infrequent in nature.

RAISING A CONCERN OR COMPLAINT:

Every person, to whom this policy applies, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage. If he/ she is unsure whether a particular act constitutes bribery or corruption or if he / she has any other queries, they should raise the matter with their respective Reporting Manager or consult an appropriate member of the HR team.

BREACHES OF THIS POLICY & PENALTIES:

Failure to comply with this Anti-Bribery policy or applicable laws may result in civil or criminal penalties as well as termination of the employment or business relationship.

RESPONSIBILITIES:

The Audit Committee / Board of Directors of the Company ("Board") shall have oversight of governance and compliance with this ABAC policy. Aggravated cases of breach of this ABAC policy shall be escalated immediately to the Audit Committee or Board.

PERIODIC REVIEW AND EVALUATION:

Our Board of Directors will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness.

This policy shall be made available to all employees and other stakeholders as appropriate. This policy shall be reviewed periodically for its suitability and updated as necessary.



Dr. Yamunadutt Agrawal
Chairman

Date: 15th March 2023