



GODAWARI POWER & ISPAT

GODAWARI POWER AND ISPAT LIMITED

CIN: L27106CT1999PLC013756

ANTI BRIBERY AND ANTI CORRUPTION POLICY

The Anti-Bribery and Anti-Corruption Policy (ABAC Policy) of Godawari Power and Ispat Limited (GPIL) is a comprehensive framework that outlines the company's commitment to ethical behavior, legal compliance, and the prevention of bribery and corruption in all its forms. This policy is intended to guide the actions of all employees, including Board Members, and is in accordance with applicable laws and regulations, such as the Indian Prevention of Corruption Act, 1988.

Key principles and provisions of this policy include:

1. **Compliance with Laws:** GPIL commits to upholding all applicable laws related to countering bribery and corruption, including but not limited to extortion, conflict of interest, forgery, fraud, money laundering, insider trading, and related practices.
2. **Responsibilities and Governance:** The policy governs the behavior of all directors, executives, employees, and associated persons in the conduct of business. It sets out their responsibilities to act ethically and avoid engaging in corrupt practices.
3. **Prohibition of Bribery:** The policy explicitly prohibits any act of offering, promising, granting, authorizing, demanding, or accepting bribes, kickbacks, illegal gratuities, illegal payments, or other illegal goods and services, directly or indirectly, to or from any person, organization, or government representative.
4. **Control and Monitoring:** GPIL is committed to establishing appropriate controls and systems to prevent, monitor, record, and report issues related to the ABAC Policy both within and outside the organization.
5. **Training and Guidance:** GPIL provides training, information, and guidance to its employees, as well as to its supply chain partners, to help identify, deter, and report bribery and corruption-related issues and ensure effective compliance with this policy.
6. **Cultural Promotion:** GPIL promotes a corporate culture characterized by merit, honesty, transparency, and integrity within the company.



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7. **Applicability:** This policy is applicable to all employees at all levels and grades within GPIL, including Board Members, Senior Managerial Personnel, Managers, Executives, Supervisors, Workers, and other equivalent grades of employees. It applies to everyone associated with the company.

8. **Supplementary Documents:** The ABAC Policy should be read in conjunction with other related policies and guidance documents, such as the Code of Conduct, Code for Regulating Insider Trading and the Whistle-Blower Policy.

9. **Commitment:** GPIL pledges to follow the principles of this policy both in letter and in spirit, emphasizing its dedication to ethical business practices and the prevention of bribery and corruption.

Overall, this ABAC Policy demonstrates GPIL's commitment to maintaining the highest standards of integrity, transparency, and legal compliance in all its operations, and it serves as a guide for all individuals associated with the company to ensure ethical conduct and prevent corrupt practices.

B.L. AGRAWAL,
MANAGING DIRECTOR

Dated 03th November, 2023

Version. 1. Approved by Board on 03.11.2023