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	CARRIER WHEELS PVT. LTD. **ANTI BRIBERY AND ANTI CORRUPTION POLICY**	Doc. No.:	CWPL/PLC/ETH/02
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1. PURPOSE

Carrier Wheels Pvt. Ltd. ("CWPL") is committed to conducting its business with honesty, integrity, and transparency.
This Anti-Bribery & Anti-Corruption Policy establishes CWPL's zero-tolerance approach towards bribery, corruption, fraud, and unethical business practices.

2. SCOPE & APPLICABILITY

This Policy applies to:

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

Compliance with this Policy is mandatory.

3. POLICY STATEMENT

CWPL strictly prohibits:

- Bribery in any form
- Corruption, facilitation payments, or kickbacks
- Improper influence over business decisions

CWPL expects all employees to comply with applicable anti-corruption laws and internal ethical standards.

4. DEFINITION OF BRIBERY & CORRUPTION

- Bribery: Offering, giving, receiving, or soliciting anything of value to influence a business decision or secure an improper advantage.
- Corruption: Abuse of entrusted power for personal or organizational gain.
- Facilitation Payments: Small unofficial payments made to speed up routine actions (strictly prohibited).

5. PROHIBITED PRACTICES

Employees shall not, directly or indirectly:

- Offer or accept cash, gifts, favors, commissions, or benefits to influence decisions
- Engage in kickbacks, commissions, or improper incentives
- Make facilitation payments to public officials or private parties
- Falsify records, invoices, or financial documents
- Use intermediaries to carry out corrupt activities

6. GIFTS, HOSPITALITY & GRATUITIES

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- Gifts or hospitality must be modest, infrequent, and transparent
- Cash or cash equivalents are strictly prohibited
- Any gift or gratuity that may create a conflict of interest must be disclosed to management
- All gifts must comply with CWPL's Code of Conduct

7. DEALING WITH PUBLIC OFFICIALS & THIRD PARTIES

Employees must:

- Exercise caution while dealing with government officials, regulators, inspectors, and third parties
- Ensure no improper payments or benefits are offered
- Avoid engaging agents or consultants for unlawful influence

CWPL does not permit bribery through intermediaries.

8. CONFLICT OF INTEREST

Employees must avoid situations where personal interests interfere with CWPL's interests. Any actual or potential conflict of interest must be disclosed promptly.

9. ACCURATE RECORDS & FINANCIAL INTEGRITY

CWPL requires:

- Accurate, complete, and transparent business records
- No false, misleading, or hidden entries
- Proper authorization and documentation for all transactions

Misrepresentation of records is considered serious misconduct.

10. REPORTING & WHISTLEBLOWING

Employees are encouraged to report:

- Suspected bribery or corruption
- Unethical or unlawful conduct

Reports can be made through established grievance or reporting mechanisms.

CWPL ensures confidentiality and protection for those reporting in good faith.

11. NON-RETALIATION

CWPL strictly prohibits retaliation against any employee who:

- Reports concerns honestly
- Cooperates in investigations

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Retaliation itself is treated as a disciplinary offence.

12. DISCIPLINARY ACTION

Violation of this Policy may result in:

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

Disciplinary measures will be proportionate to the violation.

13. TRAINING & AWARENESS

- This Policy will be communicated to employees
- Awareness may be provided through induction and periodic training
- Employees are responsible for understanding and complying with this Policy

14. REVIEW & AMENDMENT

This Policy shall be reviewed periodically to ensure:

- Continued relevance
- Compliance with legal and business requirements

15. APPROVAL & EFFECTIVE DATE

This Anti-Bribery & Anti-Corruption 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		