



ANTI-BRIBERY & CORRUPTION POLICY

NRB is committed to conduct the business with the highest ethical standards and set the expectation of all employees and business partners to act with integrity and in compliance with all applicable laws and regulations.

This policy is applicable to all NRB business locations, employees, workers and directors.

Bribery refers to the offering, giving, soliciting, or receiving of anything of value, with the intent to influence a person to act in a way that is inconsistent with their duties or in breach of trust or to gain an unfair advantage.

Corruption refers to any activity that is dishonest, illegal, or unethical, including but not limited to bribery, embezzlement, fraud, money laundering, and other forms of illegal activity.

NRB discourages any form of bribery or corruption. This policy covers various forms of bribery and corruption, which may encompass, among others, bribes to public officials, private individuals, or organizations, facilitation payments, kickbacks, and other improper payments or benefits.

Facilitation Payments

NRB prohibits facilitation payments, which are small payments made to government officials to speed up routine processes. We recognize that such payments are illegal and undermine the integrity of our business. All employees shall refuse such payments and report any requests for them to their supervisor.

Charitable Donations

NRB supports ethical and transparent charitable donations that align with our values and business objectives. We do not permit donations made to influence business decisions or to conceal bribery.

Political Contributions

Political contributions made to obtain or retain business are prohibited. We shall make all political contributions in a transparent manner and comply with all applicable laws and regulations.

Gifts and Hospitality

No employee shall receive any gift, favour, or hospitality from any person, be it a contractor, supplier, customer etc. The only exceptions to this rule are –



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- a. When employees wish to accept a token gesture, so that the other party is not offended. This must however be of insignificant commercial value. Examples of this would be receiving a box of sweets, flowers, fruits.
- b. Based on the business done when a small token gift or hospitality is accepted. An example of this would be a celebration meal at a restaurant.

In any case, one's supervisor must be kept informed of receipt of such gifts or acts of hospitality. It is also suggested gifts are shared with other staff in the office or unit, as much as reasonably possible (as in the case of sweets).

Receiving favours or hospitality, which may be of value personally to the individual, is strictly prohibited, even though the same may not have a commercial value.

Learning and Communication

We shall provide Anti-corruption compliance training programs at periodic intervals to educate all about the prevalent laws.

Conflicts of Interest

NRB Bearings Limited prohibits any conflicts of interest that may compromise the integrity of our business operations. Employees, directors, officers, contractors, and other business associates must not engage in any activity that creates, or appears to create a conflict of interest.

Enforcement and Consequences

The receipt of kickbacks, bribes, or personal payments by employees, or by spouse, family, or friends on behalf of the employees, from suppliers, contractors, contract workmen, customers, other employees, government staff or any other person or body will be treated as a violation of the Ethics policy. Any attempt to bribe an employee must also be reported to the supervisor / HR immediately.

Amendment Record:

Revision no.	Revision Date	Details of Change	Approved By