



The objective of the Ethics policy is to ensure the highest levels of integrity and honesty in our conduct, in all our transactions and dealings, both externally and internally within the Organization.

All Employees, subsidiaries, and joint ventures will adhere to, and uphold the following ethical practices. These values will provide valuable guidance to evaluate, and judge a transaction's compliance with our Ethics Policy

- We will respect and comply with the law of the land at all times.
- We will be transparent in all our dealings.
- We will not take any action that conflicts with the organization's interests. We believe that what's right for the organization gained out of ethical means will also benefit us.
- We will not take any action for personal benefit.
- We will be honest and direct with each other, and with people outside the organization.
- We must be a shining example of the highest ethical behaviour. Lack of ethical behaviour in the external world is not an excuse or license for the same in our organization.
- The organization's reputation is its greatest asset. Nothing we do must ever harm that.

### **RECEIVING FAVORS, GIFTS AND HOSPITALITY:**

No employee shall receive any gift, favor or hospitality from any person, be it a contractor, supplier, customer etc.

The only exceptions to this rule are:

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) On the basis of 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 of favors or hospitality, which may be of value personally to the individual, is strictly prohibited, even though the same may not have a commercial value. An example of this would be a contractor securing admission to a school for the child of an employee.

## **PERSONAL BEHAVIOUR AT THE WORKPLACE**

The Organization's fundamental policy is to treat all its employees with dignity and respect

- Actions constituting harassment of any employee, trainee, contractor, supplier, customer, contract employee on the basis of religion, gender, caste, community, physical disability or any other reason are strictly prohibited, no matter where they occur.
- Every employee must perform his/her work in a safe manner free of the influence of alcohol or drugs.
- Any person who threatens to commit or actually engages in a violent act on organization property will be removed from the premises and denied entry to the premises pending the outcome of an investigation into the incident.

## **FRAUD, EMBEZZLEMENT, DISHONESTY IN TRANSACTIONS**

The Organization policy prohibits fraud and establishes procedures to be followed concerning the recognition, reporting and investigation of suspected fraud. Fraud includes, but is not limited to:

- Dishonest or fraudulent act
- Theft of Organization property, including information
- Embezzlement
- Forgery or alteration of negotiable instruments such as Organization cheques and drafts;
- Conversion to personal use of cash, securities, supplies or any other Organization asset;
- Using Organization resources for personal benefit. For example asking the organization employee to carry out some personal work in one's residence.
- Unauthorized handling or reporting of Organization transactions; and
- Falsification of Organization records or financial statements for personal or other reasons.
- Tapping/ intercepting telephone/ mobile conversations and passing on the same to outsiders or to any person not authorized to receive such information.

## **ANTI-BRIBERY AND CORRUPTION**

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 / VP – HR immediately.

Bribery and corruption are serious offenses that may compromise our company's operations, finances, and reputation. NRB is dedicated to ceasing, recognising, and addressing any such activities.



## **NON – DISCRIMINATION**

We value diversity and inclusivity and strives to provide a work environment that is respectful and supportive of all individuals.

We are committed to Non-discrimination against any employee or applicant for employment based on religion, caste, community, gender, physically disabled or sexual orientation or any other category protected by applicable law.' Discriminatory actions, such as harassment, retaliations, and bias will not be tolerated under any circumstances.

## **CONFIDENTIALITY OF INFORMATION**

We are dedicated to safeguarding the privacy and confidentiality of the data entrusted to us. This encompasses both the information provided by our employees and the data received from our customers, suppliers, and other external parties involved in our business transactions.

Employees are advised to refrain from sharing personal information with individuals who do not have a legitimate business requirement to know such details. It is equally important to ensure that personal information, including performance management documents, salary information, expense reports, or medical records, is never left unsecured on a desktop, smartphone, or any accessible location.

## **CONFLICT OF INTEREST**

The company policy regarding possible conflict of interest is based on the principle that an employee decisions in the business must be made solely in the best interest of the Organization. In reaching these decisions, an employee should not be influenced by personal or family considerations, which might consciously (or unconsciously) affect his or her judgement as to what is in the best interest of Organization.

As general rule, an employee or his/her immediate family member should not have an ownership or profit interest in an organization or in the business.

No employee should have any outside business interest (which may include the business of a close family member), irrespective of whether such business provides commercial gain.

Employees are advised to avoid personal relationships within the organisation that may interfere with an individual's professional obligations. Employees involved in a personal relationship are strongly encouraged to voluntarily disclose their relationship to their immediate supervisor.



**Employees should promptly / proactively disclose of any conflict of interest to their supervisor or HR department and recuse themselves from any potential conflict of interest situation.**

### **ANTI-TRUST/ANTI-COMPETITIVE PRACTICES**

It is organization policy that all employees strictly comply with antitrust laws and the competition and antimonopoly laws of all countries, states and localities in which they conduct organization's business.

The Organization advises employees to be cautious when dealing with competitors, as employees may possess commercially sensitive information, which will be of value to the competitor. For example, meeting with employees of competitors in a public conference or an industry forum is totally acceptable.

### **ENVIRONMENTAL, OCCUPATIONAL HEALTH AND SAFETY**

We are committed to provide safe healthy and eco-friendly environment. We develop, manufacture and supply our products in safe, environmentally responsible manner to balance our business & social responsibilities resulting in lasting success of our organization and assured returns to our shareholders.

We are committed to enhance environmental, occupational health and safety performance by adhering and continually improving environmental, occupational health and safety management systems.

### **POLITICAL DONATIONS**

NRB does not use any corporate funds or assets to make political contributions or independent expenditures on behalf of candidates or parties.

NRB policy prohibits corporate political contributions of all forms, including in-kind contributions such as the purchase of tickets to fund-raising events; donations of products or service; work performed by associates during paid working hours; and the free use of any NRB facilities by any political candidate or committee.



## EQUAL EMPLOYMENT OPPORTUNITIES

We aim to promote an environment at our workplace that embraces diversity, encourages inclusion, and supports equal employment opportunities for all employees and job applicants irrespective of their religion, caste, community, gender, physically disabled or sexual orientation or any other category protected by applicable law.

## WHISTLEBLOWING

While every employee's contract of employment stipulates that he/she will not disclose any confidential information about the employer's affairs, in order to bring about accountability and transparency, NRB enables its employees to voice their concerns where they discover information which they believe shows serious malpractice, impropriety, abuse or wrongdoing within the organization.

The employees are encouraged and assisted to raise concerns without any fear of victimization, subsequent discrimination or disadvantage. If the employee has acted in good faith it does not matter if one is mistaken and the company shall ensure protection from any harassment or victimization of/against the disclosing employee.

## INFORMATION ON ANY VIOLATION OF THE POLICY

At any time if an employee becomes aware of any employee, trainee consultant, supplier or contract Associate violating the provisions of this Ethics Policy, the same should be reported immediately, in confidence to one's supervisor /Ethics Policy Committee. Strict confidentiality of the source of the information is guaranteed by the Organization if the employee does not wish to be identified.

## DISCIPLINARY ACTION IN CASE OF BREACH

*As per Disciplinary Action Policy.*

### Amendment Record:

Revision no.	Revision Date	Details of Change	Approved By