



**Brakes India**

## **Business Ethics Policy**

### **Scope of the policy**

This charter of ethics is applicable to all employees of Brakes India Private Limited and its subsidiary companies

### **Anticorruption and Bribery**

Brakes India is committed to conducting business with integrity and transparency. Employees shall refrain from offering, giving, soliciting, or accepting any bribes, kickbacks, or other illicit payments. We comply with all applicable anticorruption laws and regulations.

### **Anti-Money Laundering**

We are dedicated to preventing the use of our products or services for money laundering or illegal activities. Employees must report any suspicious transactions or activities to the appropriate authorities.

### **Data Protection and Data Security**

Protecting the confidentiality, integrity, and availability of data is paramount. Employees must adhere to all data protection laws and company policies regarding the handling, storage, and transmission of sensitive information.

### **Financial Responsibility**

We maintain accurate financial records and ensure compliance with all relevant financial regulations and standards. Employees involved in financial activities must exercise prudence and honesty in their dealings.

### **Disclosure of Information**

Our company values transparency and accountability. Employees must accurately and promptly disclose all information required by law, regulations, or company policies.

### **Fair Competition and Antitrust**

We compete fairly and ethically in the marketplace. Employees must avoid engaging in anticompetitive behaviour such as price-fixing, market allocation, or collusion with competitors.

### **Conflict of Interest**

Employees must avoid conflicts of interest that may compromise their judgment or loyalty to the company. Any actual or potential conflicts must be disclosed and managed appropriately.

### **Counterfeit Parts**

We do not tolerate the use or distribution of counterfeit or unauthorized parts in our products or services. Employees must ensure the authenticity and quality of all components used in our offerings.



# Brakes India

## Intellectual Properties

Respect for intellectual property rights is fundamental. Employees must safeguard and respect the intellectual property of others while protecting our own intellectual assets.

## Export Control and Economic Sanctions

We comply with all export control laws and economic sanctions imposed by relevant authorities. Employees must obtain necessary export licenses and approvals before engaging in international transactions.

## Whistleblowing

Our company encourages employees to report any concerns or suspicions of misconduct, illegal activities, or violations of company policies through established channel. Whistleblowing is a vital mechanism for maintaining integrity and transparency within our organization.

## Protection Against Retaliation

Our company is committed to protecting employees who report concerns or suspicions in good faith. Retaliation against whistleblowers is strictly prohibited and will not be tolerated. Retaliation includes, but is not limited to, threats, harassment, demotion, termination, or any adverse employment action taken against an employee for engaging in whistleblowing activities. Any employee found to have engaged in retaliation will be subject to disciplinary action, up to and including termination of employment.

## Training and Awareness

We provide regular training and awareness programs to ensure that all employees understand their responsibilities under this ethics policy and applicable laws and regulations. Employees are expected to stay informed about updates and changes to the policy.

## Compliance and Enforcement

Violation of this ethics policy may result in disciplinary action, up to and including termination of employment. Employees are encouraged to report any suspected violations through appropriate channel, by sending an email to 'bivigil@brakesindia.co.in'. We are committed to investigating all reports promptly and taking appropriate corrective actions.

## Conclusion

By adhering to this business ethics policy, we uphold the highest standards of integrity, honesty, and professionalism in all our business activities. Every employee plays a crucial role in maintaining our reputation and fostering a culture of ethical conduct.

**R. Madhusudhan**  
**(Director-Corp. affairs & HR)**

Nov 2024