

Policy on Anti-Competitive behavior and practices

Scope: This policy is applicable for all employees of Brakes India Private Limited with special emphasis to marketing and sales personnel.

Brakes India is committed to fostering fair and competitive markets that benefit our customers, employees, and stakeholders. Our company ensures strict ethical standards and complies with all relevant laws and regulations governing competition. We prohibit any form of anti-competitive behavior, including perceived collusion, price-fixing and any other activities that may harm competition.

- 1. Any engagement or collusion with individuals of companies having similar products or designs or technologies, which can restrict competition, maintain or increase our relative market position in a dominant way is not allowed.
- 2. Employees will ensure to engage with organizations having related products or designs or technologies by way of Memorandum of Understanding, Technical license or service agreement or non-disclosure agreement, defining the scope of engagement.
- 3. Employees must not engage in any other discussions or agreements with competitors about pricing, discounts, terms of sale, production levels, customer allocation, or any other competitive information. All communications with competitors must be lawful and based on the scope of engagement.
- 4. Employees will be made aware of these requirements through the Code of Conduct and adherence declaration from employees.
- 5. Employees who become aware of any potential violations of this policy are encouraged to report them immediately to their supervisor or the designated compliance officer, following the Vigil mechanism of Brakes India Private Limited, as a part of code of conduct. Violations could be reported anonymously, and all concerns will be promptly investigated.

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

Jan 2024

Brakes India Private Limited