



Brakes India

Anti-Bribery and Anti-Corruption Policy

Purpose:

The purpose of this Anti-Bribery and Anti-Corruption Policy is to outline guiding principles and adequate procedures to forbid any activity or conduct relating to bribery, facilitation payments, or corruption.

Scope:

Policy is applicable to all individuals working at all levels and grades, including directors, senior managers, officers, other employees (whether permanent or temporary), consultants, contractors, trainees, interns, casual workers and persons, acting on behalf of our company.

Policy Statement:

Brakes India Private Limited, is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates, and to implementing and enforcing adequate procedures to counter bribery and corruption. This includes compliance with all laws, domestic and foreign, prohibiting improper payments, gifts or inducements of any kind to or from any person, including private or public officials, customers and suppliers.

- The company enforces strict procedures to prevent, detect, and address bribery and corruption.
- Offering, accepting, or being involved in bribery or corruption is strictly prohibited.
- Accurate record-keeping of all transactions is mandatory to help detect any misconduct.
- The policy indicates the practices and process that must be upheld globally.

- The policy should be read alongside the
 1. Brakes India Code of Conduct,
 2. Whistle-blower Policy,
 3. Gifts and Hospitality Policy, and other relevant guidelines.

Definitions:

Bribery:

Bribery is offering, promising, giving, demanding, requesting or accepting any undue advantage to influence illegal, unethical, or trust-breaching actions. It may involve money or anything of value, such as improper gifts, hospitality, information, favours, jobs for relatives / friends, or travel benefits provided directly or through intermediaries, including attempts.

Brakes India Private Limited

 (044) 2625 8161 / (044) 2625 7010  MTH Road, Padi, Chennai - 600 050, India.  www.brakesindia.com

Registered Office: No.21, Patullos Road, Chennai - 600002. sales@brakesindia.co.in CIN: U35999TN1962PTC004928

Facilitation Payments:

Facilitation payments are unofficial payments to officials to expedite routine actions. Kickbacks are payments made in return for a business favor or advantage.

Corruption:

Corruption is the misuse of authority or power for illegitimate or unethical purposes, typically to gain financial or personal benefit. It includes actions such as offering or accepting bribes, money, privileges, or other advantages to improperly influence official decisions. It also includes being involved with external stakeholders like vendors, suppliers or customers through channels which yield personal gain and/or cost the company revenue, reputation or reflect poorly on the organization.

Gifts and Hospitality:

A gift is any item of value, monetary or non-monetary, including cash, valuables, discounts, services, loans, favors, or special privileges not available to the public.

Hospitality includes meals, travel, and accommodation; entertainment includes leisure activities, trips, and event tickets. Such hospitality or entertainment may also be considered a gift if not reasonable in value or frequency.

General Principles:

1. Bribery and corruption are strictly prohibited.

To reiterate, the Company strictly prohibits bribery or corruption in all forms. Employees are prohibited from giving or offering or accepting bribes, kickbacks, or similar payment or consideration of any kind, whether in India or abroad, to/by any person or entity (including but not limited to any customers / vendors / suppliers or potential customers / vendors, government officials, political party, candidate for political office or any intermediaries, such as agents, attorneys or consultants) in order to influence official acts or decisions of that person or entity, obtain, expand or retain business for, or direct business to the Company and/or secure any improper advantage.

2. Accepting or offering 'facilitation payments' is forbidden.

Making or accepting the 'facilitation payments' either directly or indirectly through agents, contractors or intermediaries by employees and business partners is prohibited.



Brakes India

3. Gifts, Meals, Hospitality and Entertainment

The Company acknowledges that giving and receiving benefits (such as gifts, meals, and entertainment) within permissible value is a common business practice and is intended to strengthen and build long-term business relationships. Refer in detail to Gifts and Hospitality Policy.

4. Interactions with Public Officials

Interactions with public officials require enhanced scrutiny and sensitivity. While it is the Company's policy to prohibit paying bribes to anyone, some Anti-Bribery and Anti-Corruption Laws primarily apply only to payments to government officials.

For example, payments, gifts, or offering employment to close relatives of public officials can be treated by enforcement authorities as direct payments to the public officials and, therefore, may constitute violations of applicable Anti-Bribery and Anti-Corruption Laws. In addition, because interactions with public officials carry special risks under applicable Anti-Bribery and Anticorruption Laws, contracts and payments to public officials should be reviewed carefully to determine what additional safeguards, if any, may be necessary to protect the Company.

5. Political Donations and Lobbying

No employee shall offer contributions to political parties or candidates that might influence or be perceived as influencing a business decision. It is the Company's policy that under no circumstances shall Company funds be used to make political contributions to political parties or candidates in any country, even if such contributions are permitted by a country's written laws or regulations. The Company's policy is not intended to discourage or prohibit employees of a Company from voluntarily making personal political contributions, participating in the political process on their own time and at their own expense, expressing their personal views on legislative or political matters, or from otherwise personally engaging in political activities in such country.

6. Third party:

- i The Company may be held responsible for bribes paid on its behalf by third parties, with severe and often irreparable consequences, even if the Company did not authorize these payments. Therefore, it is critical that we are careful in the selection of third parties.
- ii. All associations with third parties must be carried out with the highest standards of integrity and in compliance with all relevant and applicable laws and regulations. Third party selection should never be based on receipt or expectation of a gift, hospitality, payment or favour of any kind or manner.

Brakes India Private Limited

☎ (044) 2625 8161 / (044) 2625 7010 📍 MTH Road, Padi, Chennai - 600 050, India. 🌐 www.brakesindia.com

Registered Office: No.21, Patullos Road, Chennai - 600002. sales@brakesindia.co.in CIN: U35999TN1962PTC004928



Brakes India

7. Charitable Donations

- i. No employee shall offer donations to business partners or public officials if it is a pre-requisite for future business or if the offer of a donation is intended to obtain a business advantage.
- ii. Charitable donations or requests for charitable donations made by individuals on their own behalf should comply with any applicable local laws and regulations. It is recommended that all such donations or contributions are documented with receipt.
- iii. If an employee is requested by a public official to make a personal donation to a particular charity, she/he must seek authorization from the CSR Committee before agreeing to or making the donation.
- iv. The Company also believes in contributing to the communities in which it does business and permits reasonable donations to charities, however, it needs to be certain that donations to charities are not disguised as illegal payments to government officials in violation of Anti-Bribery and Anti-Corruption Laws.
- v. The Company also needs to confirm that the charity does not act as a conduit to fund illegal activities in violation of anti-money laundering laws or anti-terrorism laws. It is therefore the Company's policy that, unless authorised by the Company in writing pursuant to the Company's CSR Policy, employees are prohibited from using the Company's resources to give donations.
- vi. All requests on behalf of the Company for corporate gifts to charities and other not-for-profit organizations must be authorized in advance by the CSR Committee.

8. Record-Keeping

Records of all transactions with all external stakeholders have to be maintained in a complete, accurate, and detailed manner so that the purpose and amount of the transactions are clear.

Reporting Concerns:

Employees, vendors and contractors must comply with this Policy and promptly report suspected violations. Reports should be made to the Vigilance Committee. All reports must be taken seriously, assessed, and investigated appropriately with strict confidentiality. Reporting in good faith will not result in retaliation. Employees must report any suspected violation through:

- Immediate supervisor
- Ethics/Compliance Officer
- Whistleblower mechanism

Brakes India Private Limited

(044) 2625 8161 / (044) 2625 7010 MTH Road, Padi, Chennai - 600 050, India. www.brakesindia.com

Registered Office: No.21, Patullos Road, Chennai - 600002. sales@brakesindia.co.in CIN: U35999TN1962PTC004928



Brakes India

All employees are encouraged to raise their concerns and queries about any issues, breaches, or malpractices at the earliest possible stage.

Enforcement and Disciplinary Actions:

The Company will take fair and consistent disciplinary action for any breach of this Policy, based on the nature and facts of the violation. Consequences may include suspension, imposition of penalties, withholding of promotion / increment, or termination without notice. Violations may also breach Anti-Bribery and Anti-Corruption laws and, if identified, may be reported to appropriate authorities, potentially resulting in fines, penalties, or imprisonment.

Review and Amendments

This policy shall be reviewed periodically and updated as required.

Training and Awareness

The Company communicates transparently all necessary and relevant information with all the relevant stakeholders regarding policies and procedures related to Anti-Corruption and Anti-Bribery. This Policy shall be available on internal portal and/or on the website of the Company. Focused Awareness programs should be conducted for high-risk roles. ¹

R. Madhusudhan
(Director-Corp. affairs & HR)
June 2026

Brakes India Private Limited

☎ (044) 2625 8161 / (044) 2625 7010 📍 MTH Road, Padi, Chennai - 600 050, India. 🌐 www.brakesindia.com

Registered Office: No.21, Patullos Road, Chennai - 600002. sales@brakesindia.co.in CIN: U35999TN1962PTC004928