



Brakes India

Fair Trading Policy

Brakes India is committed to ensuring all business activities are conducted ethically, transparently, and in compliance with applicable competition, anti-corruption and fair-trade laws.

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 agency staff, agents, or any other person associated with our company and such other persons, including those acting on behalf of our company.

Policy Statement:

The organization is committed to conducting our business in a socially responsible and sustainable manner. We believe in promoting fair trade practices that respect human rights, protect the environment, and foster economic development in the regions where we operate. We are committed to maintaining fair and transparent relationships with our suppliers, subcontractors, and all stakeholders involved in our supply chain.

General Principles:

Ethical Business Conduct

- Conducting business in a fair, transparent, and accountable manner;
- Avoiding anti-competitive practices, including price-fixing, bid rigging, and market allocation;
- Preventing bribery, corruption, and conflicts of interest;
- Ensuring ethical dealings with customers, suppliers, and all stakeholders;
- Complying with all applicable laws and regulations relating to competition, trade, and business conduct across all jurisdictions.

Fair Trading and Responsible Sourcing

- Engaging in fair trading practices, including timely payments, fair and transparent pricing mechanisms that support equitable compensation to suppliers and encourage sustainable business relationships.
- Strike a balance between fair prices and maintaining affordable and competitive products for consumers.
- Provide training and capacity building opportunities to our suppliers to enhance their understanding and implementation of fair trade principles.

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



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Human Rights and Labour Standards

- No child labor, no forced labor and all forms of modern; slavery within operations and the supply chain;
- Promoting equal opportunity, non-discrimination, and diversity;
- Respecting the rights of workers, including freedom of association and collective bargaining in accordance with applicable laws;
- Ensuring safe, healthy, and humane working free from hazards and risks.
- Providing fair wages that meet or exceed local legal requirements and are in line with industry standards. Employees will receive benefits and incentives that support their well-being and quality of life.
- Employee development through training and development opportunities to foster their skills and career growth.

Environmental Responsibility

- Committing to environmentally responsible practices within operations (Minimizing waste, energy conservation, recycle etc).
- Encouraging suppliers to minimize environmental impact through sustainable sourcing, efficient resource use, and compliance with environmental regulations.

Community and Social Development

Commitment to fair trade extends to the communities where we operate and source our products. We support community development initiatives that empower local communities, improve livelihoods, and foster economic growth.

Culture of Integrity

The organization fosters a culture of ethics, accountability, and compliance, where employees and business partners are expected to understand and adhere to legal and ethical requirements, seek guidance when needed, and uphold the highest standards of conduct.

Key Controls:

- Incorporation of fair-trading principles into the Code of Conduct.
- Whistleblower mechanisms for reporting concerns.
- Periodic assessments of fair trading and competition compliance.
- Due diligence of suppliers and business partners to ensure ethical compliance.
- Ensure transparent communication of business practices with stakeholders and maintain documentation enabling accountability in sourcing, procurement, and pricing decisions.

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Responsibilities:

All employees, consultants, contractors, trainees, interns, casual workers and agency staff, agents, or any other person associated with our company and such other persons, including those acting on behalf of our company, suppliers must adhere to fair trading practices.

Conflict of Interest Process

The organization is committed to identifying and managing conflicts of interest involving employees and business partners.

- All employees and relevant business partners must disclose any actual or potential conflicts of interest that may affect impartial decision-making.
- Disclosures shall be made to the reporting manager and/or Legal/Compliance function and updated as required.
- The organization shall evaluate such disclosures and implement appropriate mitigation measures.
- Failure to disclose conflicts may result in disciplinary action or termination of business relationships.

Reporting & Enforcement

All employees, business units and business partners, including suppliers, contractors and consultants are encouraged to report any suspected violation through appropriate channel, by sending an email to bivigil@brakesindia.co.in. We are committed to investigate all reports promptly and taking appropriate corrective actions.

Non-Compliance:

Any violation of this policy may result in disciplinary action, including employee disciplinary action or termination employment or contracts, and in addition may also lead to legal consequences in accordance with applicable laws.

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

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