



# Nahar

CAPITAL AND FINANCIAL SERVICES LTD.



(SYSTEMICALLY IMPORTANT NON-DEPOSIT TAKING NON-BANKING FINANCIAL COMPANY)

Regd. Office & Corporate Office : "Nahar Tower", 375, Industrial Area-A, Ludhiana-141 003 (INDIA) Website : www.ownahar.com

Phones : 91-161-2600701 to 05, 2665000 Fax : 91-161-2222942, 2601956, 5205700

Email : ncfs@ownahar.com nsmfin@ownahar.com

CIN No. : L45202PB2006PLC029968

GSTIN : 03AACCN2866Q1Z2

## Policy on Anti-Bribery Policy

### 1. Background

Nahar Capital and Financial Services Limited Code of Business Conduct requires all employees supplier and contractors to accept responsibility for maintaining and enhancing the Company's reputation for integrity and fairness in its business dealings. We do not tolerate bribery. This policy is intended to help employees, Supplier, contractors and other third parties acting on the Company's behalf to understand where issues might arise and to support them in making the right decisions in line with our corporate position as stated in this policy.

### 2. What do we mean by Bribery?

Bribery is the offering, promising or giving of a financial or other non-financial advantage to somebody in order to influence improperly their views or actions. It also covers requesting, agreeing to receive or receiving a financial or other non-financial advantage to influence improperly your views or actions. The law defines improper performance as a breach of trust, lack of impartiality or performance in bad faith.

Bribery of foreign public officials (in order to obtain or retain business or an advantage in doing business) as well as companies and private individuals are all equally prohibited under the laws of many countries and under this policy.

The law is intentionally drafted to cover a wide range of behavior.

There is an accompanying guidance document which gives specific examples to assist with compliance.

### 3. Third parties

Nahar could be held responsible for the actions of a third party (e.g. distributor, agent, contractor, supplier, joint venture partner) acting on its behalf. As such, care must be taken to ensure that those third parties do not attempt to engage in bribery.

Payment of third parties should be on commercially reasonable terms. Any payments to third parties shall be as provided under their contract which shall also set out the detail of the services which they shall provide. Requests for one-off changes to the payments shall be rejected unless the reason is clearly documented in writing.

Mumbai : 414, Raheja Chambers, 213 Nariman Point, Mumbai - 400 021

Phones : 91-22-22835262, 22835362

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E-mail : mumbai@ownahar.com

Gurgaon : Flat No. 22-B, Sector-18, Gurgaon-120 015 (INDIA)

Phones : 91-124-2430532-2430533

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#### 4. Gifts and hospitality

There are legitimate reasons for the occasional giving/receiving of gifts and business-related hospitality but this area can pose a risk where excessive gifts or hospitality could be viewed as a bribe and/or a conflict of interest. The principles set out here apply regardless of whether the gift or hospitality is to be provided to the RB employee, a third party employee or to members of their respective families, friends or acquaintances.

#### General Principles:

- Nahar employees must never ask or encourage a third party to provide a gift or hospitality to them.
- The impression should never be given that the award of business conditional on gifts or hospitality.
- Under no circumstances should gifts of cash be given or received.
- Gifts and hospitality should be provided on an occasional basis and always in accordance with local laws.
- Tickets to sporting events may be acceptable (provided that they are not offered or given to public officials or healthcare professionals) if they comply with the General Principles in this section.
- Gifts and hospitality around the time of contracts being awarded/ tendered should be avoided.
- A useful test could be to consider whether you or the third party would have the resources to or would be likely to buy the gift/hospitality themselves
- Cultural sensitivities are important but they must not be used as an excuse to avoid the effect of this policy
- Gifts or hospitality of excessive value are not permitted
- All gifts and hospitality provided by Nahar must be accurately recorded in the books.
- Consider whether you would be happy to defend giving or receiving the relevant gift or hospitality to your peers, to senior management, to the media or to a judge.

Special requirements for procurement of goods or services: When discussing tenders or award of contracts to provide goods or services to Nahar, the relevant employees must not accept:

- Payment of any travel or accommodation costs by the potential supplier
- Kickbacks for awarding the business to that supplier

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- Tickets to entertainment events (e.g. sports events, theatre, opera)
- Anything of value resulting from Nahar awarding business to a third party which would benefit that individual or another third party, rather than Nahar.

## 5. Facilitation payments

Facilitation payments are small unofficial payments to ensure or speed up performance of routine or necessary action. As a representative of the company, you must not make any facilitation payment.

## 6. Political contributions

As stated in our Code of Business Conduct (the "Code"), the Company is not a political organization. It does not support political parties or contribute funds to groups whose activities are calculated to promote party interests or the election of a specific candidate. In some limited instances, if permitted by local law and regulation and with specific approval from the **CEO/MD**, the Company may contribute funds toward organizations or entities that engage in the political process to address an issue that directly affects the Company and its business activity. Any such request for approval for such payments and the permission must be documented in writing and the payments properly recorded.

Training is an important part of the implementation of anti-bribery policy and procedures. Training should be mandatory for new joining.

*This policy will be reviewed on yearly basis and changes if any, will be incorporated which will be communicated to all employees through verbal communication as well as through posting updates on notice boards.*

With Effect from- 10<sup>th</sup> Oct 2019.

Place- Ludhiana (India)

Reviewed on:-18th Dec 2023.

Next Review- Dec 2024.

Prepared By

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Approved By

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VP (Personnel)

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