



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Purpose:

One of the core values of Kirloskar Brother Limited (KBL) is 'Integrity and Accountability' and we are committed to conduct business with uncompromising integrity and professionalism. We take a zero-tolerance approach to bribery and corruption. Each of us at KBL is bound to adhere to the norms and rules prescribed in this policy.

2. Scope of application:

This policy is applicable to all the business divisions of KBL (hereinafter referred as "the Company") and its business associates, subsidiaries, and joint ventures. This policy is applicable to all individuals working at all the levels of the organization.

We expect our suppliers, customers, and service providers to respect our values and ethical standards. It is responsibility of KBL staff to advise such associates of our commitment to operate in ethical and honest way.

3. Policy:

- I. The Company is committed to act with honesty and integrity to avoid conflict of interest.
- II. The Company adheres to applicable anti-bribery and anti-corruption laws in all markets in which it operates.
- III. The Company never offer any form of gifts, entertainment, or anything of value to any party for obtaining or retaining business, influence in business decision, securing an unfair advantage, bribes, kickbacks, and facilitation payments.
- IV. The Company also prohibits accepting all forms of bribery, corruption, kickbacks, or facilitation payments, directly or indirectly that could cause improper influence on core values of the Company.
- V. This policy is supplemented by our "Code of Ethics" that addresses all ethical aspects like Compliance, Business Conduct, Relationship & Enforcement.
- VI. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

4. Implementation

- I. This policy shall be communicated to all employees and made available to interested parties.
- II. The CHRM&C Head, through the Functional Heads of the Departments shall be responsible for ensuring that the policy is implemented throughout the Company.
- III. Compliance with the Policy shall be monitored and evaluated by the ethics counsellor on a regular basis. Any grievances/ complaints with respect to violation of the policy shall be reported to the ethics counsellor of the Company.



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KIRLOSKAR BROTHERS LIMITED

A Kirloskar Group Company

IV. Non-compliance to the policy shall be communicated to Company Secretary, who shall report it to the Board of Directors.

5. Modification or Amendment in the policy:

The Company reserves the rights to amend the terms in the policy as and when required. Any or all provisions of this Policy would be subject to revision or amendment in accordance with the guidelines on the subject as may be issued by the Central Government, and or any other statutory authorities, from time to time.

For Kirloskar Brothers Limited,

Sanjay C. Kirloskar
Chairman & Managing Director

March 01, 2023