MUNJAL KIRIU

Rules for anti-bribery checks when appointing service providers

Established on 20th December, 2024

1. Purpose

Munjal Kiriu Industries Private Limited will conduct business honestly and in accordance with laws and regulations. We will comply with the laws, regulations, and guidelines regarding the prohibition of bribery that apply to the countries and regions in which we conduct business, and will establish a procedure manual for the appointment of service providers with the aim of practicing behavior that conforms to social ethics.

2. Scope

This management procedure applies to everyone working at Munjal Kiriu Industries Private Limited.

3. Definitions

" Government employee " means:

- Employed or associated with a public organization or public international organization (e.g. World Bank, United Nations, etc.) and all persons who are advisors to.
- All officers and employees of any government enterprise, government corporation, or political party, or any person acting on behalf of a government enterprise, government corporation, or political party in an official capacity.

"Service provider" means a person who provides services to the our company in relation to business activities with business partners.

4. Requirements to be observed

Munjal Kiriu Industries Private requests the following of all employees working at Munjal Kiriu (officers, advisors, full-time employees, contract employees, temporary employees, dispatched workers, and anyone otherwise employed by Munjal Kiriu and third parties to which Munjal Kiriu outsources work:

MUNJAL KIRIU INDUSTRIES (P) LTD. Plot No. 192, Sector-4, IMT Manesar-122050 PAN No. AAFCM1839D GURGAON

(1) Prohibition of Bribery

Not offer, promise, or give a bribe, or request, promise, or accept a bribe, whether directly or indirectly, to any person.

(2) Prohibition of entertainment and gifts to Government employee.

Do not provide entertainment or gifts to Government employee. However, if exceptions are made within the scope of common sense in light of socially accepted norms, appropriate procedures and approvals must be followed, and appropriate post-approval confirmation must be conducted.

(3) Establish sound business relationships

Conduct business only with lawful and non-suspect parties and endeavor to introduce - clauses in contracts with these parties that prohibit bribery.

(4) Thorough management of accounting records

With respect to all transactions of the company, the company shall accurately and properly record in its books of account, etc., all receipts and expenditures to third parties in connection with its business, in reasonable detail, so that the company can prove that no bribery has taken place.

(5) Report

If you suspect a violation of the prohibition on bribery, report it promptly so that appropriate action can be taken in a timely manner.

5. Appointment of Service Providers

When employing a service provider in relation to business activities with a business partner, employees of Munjal Kiriu must not instruct, instigate or assist the service provider in committing an act of bribery. Furthermore, employees must not pay remuneration or other money to the service provider with the knowledge that the service provider will commit an act of bribery.

If Munjal Kiriu appoints a customs broker or consultant (※), it must conduct a self-check in accordance with the checklist in Appendix 1 prior to the appointment to ensure that there are no problems with the details of the appointment of the service provider.

If, as a result of the self-examination under the preceding paragraph, there are any items requiring caution regarding the service provider to be employed, or there is any doubt as to such items, approval of the President must be obtained prior to the employment of the service provider.

When appointing a service provider, a written contract for said appointment shall be concluded , and a non-bribery pledge shall be inserted in the contract or obtained separately in writing from the service provider. (Appendix 2: Letter of Commitment on Anti-Bribery)

6. Jurisdiction of Procedures

The revision, abolition, operation, and interpretation of this procedure manual are the responsibility of Legal Department.

(※)

1. Customs brokers

(There is a risk of fraudulent payments, such as facilitation payments, occurring.)

1) Includes logistics companies that handle everything from transportation to customs clearance.
2) Logistics alone is excluded (as the risk of fraudulent payments is significantly lower compared to customs brokers).

2. Consultant (may include meetings with public officials)

1) All areas including safety, health, environment, labor, electricity, etc.
2) Consultants include law firms and accounting firms.
3) The following cases are not covered:

① The Big 4 (KPMG, PWC, Deloitte, E&Y), law and accounting firms referred by Sumitomo Corporation.

② When an accounting firm is only responsible for audits. When a law firm is only responsible for legal advice.

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