

# ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

## Overview

The Anti-Bribery and Corruption Policy Statement (the Policy) outlines guidelines of NMDC Group and its subsidiaries' (the "Group") commitment to act in accordance with applicable laws regarding bribery and corruption and to conduct business with the highest ethical standards.

## Scope

The Policy applies to all directors and employees who are required to comply with the Policy. Further, business partners are expected to adhere to the principles stated in this Policy, the Business Code of Conduct (the "Code") and comply with the Business Partner Code of Conduct.

The scope covers any bribery and corruption as prohibited per UAE anti-bribery and corruption legislation, United States Foreign Corrupt Practices Act (FCPA), and the UK Bribery Act among other anti-bribery and corruption laws as applicable to the Group.

## Policy Commitments

NMDC Group aims to ensure that directors, employees, and business partners are informed that NMDC Group maintains anti-bribery and corruption measures through its compliance program which is designed to prevent, detect, and remediate potential bribery and corruption related violations.

The Group also aims to comply with all the relevant anti-bribery and corruption laws and regulations and provide guidance to directors and employees in recognizing, avoiding, and addressing situations that can be perceived as bribery and corruption.

## Bribery and Corruption

NMDC Group takes bribery and corruption issues very seriously and is committed to maintaining the highest standards of professional and ethical conduct. directors, employees, business partners, and external parties collaborating with or acting on behalf of the Group must avoid any conduct that is expressly prohibited by anti-bribery and corruption legislation in all circumstances and must use their best effort to avoid behaviours that could appear as bribery and corruption.

UAE anti-bribery and corruption legislation, the United States' Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA), among other anti-bribery and corruption laws, apply to the Group.

## Facilitation Payments

The Group prohibits facilitation payments in any form, whether made directly or indirectly. If you are approached for a facilitation payment, you should not agree to the request unless there is an imminent threat to your health or safety.

## Contributions to Government Agencies and Political Parties

The Group prohibits its directors and employees from making any donations or contributions in cash or in kind, directly or indirectly, to any political party, government agency or any person for political purposes on behalf of the Group. Directors and employees willing to make such a donation or contribution in a personal capacity must not give the impression that a donation or contribution is made in connection and/or on behalf of the Group.

## Donations and Contributions to Charities

Donations and contributions for charitable purposes are made by the Group to non-profit entities dedicated to social, environmental, or humanitarian causes. All donations shall be permissible under the law, aligned with the Policy and the Business Code of Conduct, and not suggest any unethical conduct like bribery. Donations and contributions should undergo a proper due diligence by the relevant function/department, be made and shall be through direct payments without any intermediaries, and they should not involve public officials, or any individual except when the donations are channeled through the Group CSR program.

## ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

### **Sponsorship**

Sponsorships by the Group involve financial support or provision of goods and services in exchange for association with a project or program, and must be lawful, align with the Policy and the Business Code of Conduct without suggesting unethical conduct. Sponsorships require proper due diligence on the recipients from the relevant function/department, direct payments without intermediaries, and must be formalized through legally binding agreements vetted by the Legal Department and reviewed by Ethics & Compliance.

### **Responsible Lobbying**

In countries of operation where lobbying is recognized, the Group may engage in lobbying which can be defined as the responsible oral or written communication with a public official to influence legislation, policy, or administrative decisions with the approval of the Group's management. This is to protect the Group's interests and to align with new/positive developments within those countries of operation. The Group commits to respect laws applicable to lobbying and establishes a list of persons authorized to lobby which is reviewed by the Legal Department on a timely basis.

### **Compliance**

The Group has instituted a comprehensive compliance program to uphold anti-bribery and corruption laws, emphasizing prevention through a strong compliance culture, rigorous policies, and thorough training. Key components include regular risk assessments, robust internal controls, and a whistleblowing system to detect and address unethical behaviors effectively. Remediation efforts involve implementing mitigation plans and taking disciplinary actions against violations to ensure continuous adherence to legal and ethical standards.

### **Roles and Responsibilities**

In general, all employees should uphold principles as set forth in this Policy. Responsibility of setting the Policy (including any amendment thereof) and monitoring its compliance is with the Board of directors while the Ethics & Compliance function shall have responsibility for ensuring the implementation/compliance of the Policy and continuous improvement.

### **Policy Review**

Ethics & Compliance shall review this Policy as and when required and propose modifications and updates as deemed necessary.

This Policy Statement is only an extract from the original Anti-Bribery and Corruption Policy.  
This Policy Statement was last reviewed in May 2024.

