

## Anti-Bribery and Anti-Corruption Policy

NIST Global Private Limited is committed to conducting all its business activities with the highest standards of honesty, integrity, transparency, and ethical conduct. The objective of this Policy is to prevent, identify, and eliminate bribery, corruption, fraud, and unethical practices across all NIST Global operations.

This Policy clearly defines unacceptable conduct within NIST Global and establishes a zero-tolerance approach towards bribery and corruption in all forms.

This Policy applies to:

- All employees of NIST Global, irrespective of role, designation, or seniority, including:
  - Management and department heads
  - Consultants, trainers, auditors, contractual staff, agents, and any individuals or entities associated with NIST Global
- All business activities and engagements across Business-to-Customer (B2C), Business-to-Business (B2B), and Business-to-Government (B2G) operations

All persons associated with NIST Global are required to comply with this Policy at all times while representing, acting for, or engaging with the organization.

### Zero-Tolerance Policy Statement

NIST Global follows a strict zero-tolerance approach towards bribery and corruption.

Any employee or associated person found engaging in bribery, corruption, misuse of position, or unethical financial practices shall be subject to strict disciplinary action, which may include immediate termination, irrespective of role, seniority, or relationship with management.

### Bribery and Corruption at NIST Global

At NIST Global, bribery and corruption include, but are not limited to:

- Offering, promising, giving, requesting, or accepting any undue benefit while representing NIST Global, including:
  - Money or cash payments
  - Gifts or hospitality
  - Commissions, kickbacks, or discounts
  - Services or favours
  - Employment opportunities or promises
  - Any other benefit of value
- Using one's official position to gain personal or third-party financial or non-financial benefit

- Influencing business decisions, certifications, audit outcomes, pricing, contracts, or deliverables through improper means

## Unacceptable Practices

The following practices are strictly prohibited at NIST Global and shall be treated as serious misconduct:

- Requesting, borrowing, or accepting money from candidates, clients, vendors, colleagues, or other stakeholders for personal reasons
- Making or accepting payments through personal bank accounts, wallets, or unofficial channels for NIST Global business
- Paying fees, charges, or expenses on behalf of others with an expectation of reimbursement outside approved processes
- Collecting amounts beyond approved pricing or fees and issuing unofficial, manipulated, or unsupported receipts
- Handling cash transactions or payments outside authorized NIST Global systems and records
- Soliciting or accepting any form of bribe, commission, kickback, or personal benefit in exchange for business advantage
- Issuing certificates, reports, approvals, or deliverables without legitimate participation, attendance, compliance, or authorization
- Manipulating records, reports, invoices, receipts, or documentation for personal or third-party benefit
- Accepting gifts, benefits, or employment offers that compromise independence, objectivity, or professional judgment
- Allowing unauthorized influence over pricing, certification, audit findings, staffing decisions, tenders, or contractual outcomes
- Engaging intermediaries or third parties who demand a percentage or benefit to secure business, contracts, or approvals
- Threatening, influencing, or retaliating against any person who refuses to participate in bribery or who reports concerns in good faith

## Gifts, Hospitality, and Benefits

At NIST Global:

- Cash or cash-equivalent gifts are strictly prohibited
- Gifts or hospitality must never influence, or appear to influence, business decisions

- Any gift, hospitality, or benefit that creates an obligation, expectation, or conflict of interest is not acceptable

Where there is any doubt, employees must refuse the offer and report the matter.

### **Facilitation Payments and Kickbacks**

**Facilitation payments** are unofficial payments made to speed up routine actions or approvals. **Kickbacks** are improper payments, commissions, or benefits given or received in return for securing business, contracts, orders, or favours.

Facilitation payments and kickbacks are strictly prohibited at NIST Global, irrespective of:

- Amount involved
- Local customs or practices
- Business pressure
- Urgency or deadlines

### **Reporting and Escalation Mechanism**

All suspected or actual incidents of bribery or corruption must be reported immediately to: **hr@nistglobal.com**

**Process:**

- HR will acknowledge receipt of the concern
- HR will immediately escalate the matter to Management
- Management will review, investigate, and decide appropriate action

There shall be no bias in reporting, investigation, or decision-making, even if the individual involved has close association with management or department heads.

### **Protection Against Retaliation**

NIST Global strictly prohibits retaliation against any individual who:

- Refuses to participate in bribery or corruption
- Reports concerns or suspected violations in good faith

Any form of retaliation shall itself be treated as a serious violation of this Policy.

### **Roles and Responsibilities**

- **Employees and Associated Persons:** Must comply with this Policy and report violations
- **Department Heads:** Must ensure awareness and escalate issues without delay
- **Human Resources:** Must coordinate reporting, investigation, and communication with Management

- **Management:** Holds final authority for investigation outcomes and disciplinary action

## **Disciplinary Action**

Depending on the nature and severity of the violation, disciplinary action may include:

- Written warning
- Suspension
- Immediate termination
- Legal or regulatory reporting, where applicable

## **Awareness and Communication**

This Policy shall be:

- Communicated to all employees and associated persons
- Covered during induction and periodic awareness sessions
- Enforced consistently and uniformly across the organization

## **Policy Review**

This Policy shall be reviewed periodically and updated based on:

- Operational experience
- Reported incidents
- Changes in business activities or regulatory requirements

Signed by **Chairman & MD**

**We Contribute to Safety**  
Effective Date: 17th Dec 2025



Mr Antony Selvaraj