

ANTI-BRIBERY POLICY



We, at Numaligarh Refinery Limited, are in the business of refining crude oil to produce petroleum products, distributing the same through our channel partners, and maintaining them as per the requirements of our customers.

We are committed to:

- Zero tolerance to bribery.
- Acting fairly, honestly, ethically, professionally, and with integrity.
- Making all efforts to prevent, detect, and respond to bribery.
- Adhering to all applicable legal requirements.
- Reviewing the Anti-Bribery Management System (ABMS) periodically and keeping the Board of Directors (Governing Body) updated on the latest status.
- Ensuring awareness among all employees and associates to recognize and detect bribery issues.
- Addressing the needs and expectations of stakeholders regarding anti-bribery.
- Encouraging our employees and business associates to report instances of bribery without fear of reprisals.
- Setting up the Vigilance Department as the Anti-Bribery Compliance Function, with defined responsibilities and authority.
- Ensuring that all employees and business associates are aware of the consequences of not adhering to the ABMS.
- Undertaking periodic risk assessments to update risks, so that our controls, objectives & procedures to risks lead to continual improvement through teamwork.
- Ensuring that the Anti-Bribery Management System as per ISO 37001:2016 is effectively implemented & maintained.

A handwritten signature in black ink, appearing to read 'Bhaskar Jyoti Phukan', is positioned above the name and title.

(Bhaskar Jyoti Phukan)
Managing Director

Dated: 12.06.2025