

BUSINESS ETHICS POLICY (V1.0)

**NAVIGATING GREY AREAS WITH
CLEAR PRINCIPLES**

NE  STAR

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1. Purpose

This policy defines the ethical principles that govern how we conduct business. It applies to decisions, behaviours, and relationships across our operations, supply chain, and customer engagements.

We recognize that ethical conduct is not established through declarations alone, but through **consistent decision-making**, especially where commercial pressure, asymmetry of power, or weak enforcement environments exist.

2. Scope

This policy applies to:

- Directors and management.
- Employees at all levels.
- Contract workers and consultants.
- Business partners, agents, and intermediaries, to the extent of our influence.

3. Legal Compliance as a Minimum

We comply with all applicable laws and regulations governing our business, including those related to:

- Anti-corruption and bribery.
- Competition and fair trade.
- Taxation and financial reporting.
- Environmental, labour, and safety regulations.

Legal compliance is **mandatory** and **non-negotiable**. However, we explicitly recognize that **ethical responsibility does not end where the law stops**, particularly in environments where enforcement may be inconsistent or selective.

4. Our Staged Approach to Business Ethics

Stage 1 – Compliance and Integrity (Baseline)

- Full compliance with applicable laws and regulations.
- Accurate and truthful record-keeping.
- No falsification, misrepresentation, or concealment of material facts.
- Zero tolerance for bribery or facilitation payments.

This stage establishes legality and basic integrity.

Stage 2 – Ethical Judgment and Responsible Conduct

Beyond compliance, we recognize ethical risks that arise from:

- Power imbalance between buyers and suppliers.

- Information asymmetry with customers.
- Pressure to reduce costs at the expense of safety, quality, or legality.
- Normalization of informal or opaque practices.

Our objective is to apply **ethical judgment**, not merely technical legality, when such risks arise.

Stage 3 – Review, Accountability, and Improvement

Ethical risks evolve with scale, markets, and partnerships. We commit to:

- Periodic review of ethical risks and controls.
- Learning from incidents, near-misses, and grievances.
- Strengthening governance where weaknesses are identified.
- Avoiding defensive or symbolic responses to ethical concerns.

5. Core Ethical Commitments

5.1 Anti-Bribery and Anti-Corruption

We recognize that in certain operating environments businesses may face pressure to make informal payments to expedite or avoid obstruction of routine administrative processes.

Our position is not based on denial of this reality, but on clear boundaries. We do not offer or authorize bribes, kickbacks, or inducements intended to improperly influence decisions, secure unfair advantage, or conceal non-compliance.

Where pressure is encountered, our approach is to rely on lawful processes, documentation, escalation, and time – accepting delay or inconvenience where necessary rather than normalizing corrupt practices.

Business decisions must be based on merit, value, and lawful conduct.

5.2 Fair Competition and Honest Dealings

We commit to:

- Competing fairly and lawfully.
- Avoiding anti-competitive agreements or collusion.
- Providing truthful and accurate information to customers.

We do not seek advantage through deception, misinformation, or manipulation.

5.3 Conflicts of Interest

Employees and decision-makers must:

- Disclose actual or potential conflicts of interest.

- Avoid situations where personal interests conflict with company interests.
- Refrain from influencing decisions where conflicts exist.

5.4 Transparency and Accuracy

We commit to:

- Honest communication with customers, suppliers, and stakeholders.
- Accurate representation of product performance, certifications, and sustainability claims.
- Avoiding selective disclosure or data obfuscation.
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Claims must be **fact-based, verifiable, and defensible**.

5.5 Responsible Sourcing and Supply Chain Conduct

We recognize that unethical practices often occur upstream or downstream of direct operations. Accordingly:

- We do not knowingly benefit from illegal or unethical practices in our supply chain.
- We apply a risk-based approach to supplier engagement.
- We avoid outsourcing ethical risk to achieve commercial advantage.

5.6 Financial Integrity

We maintain:

- Accurate books and records.
- Proper authorization and documentation of transactions.
- No off-book accounts or undisclosed arrangements.

Financial integrity is fundamental to trust.

5.7 Respectful Business Conduct

We expect respectful, professional behavior in all business interactions. Harassment, intimidation, or abusive conduct—whether internal or external—is inconsistent with ethical business practice.

6. Gifts, Hospitality, and Business Courtesies

Gifts or hospitality must:

- Be reasonable, infrequent, and transparent.
- Not create an obligation or expectation of favor.
- Comply with applicable laws and internal approvals.

Anything intended to influence judgment is prohibited.

7. Reporting Concerns and Whistleblowing

We encourage the reporting of ethical concerns, including suspected misconduct or violations of this policy.

Reports may be made without fear of retaliation.

Concerns will be reviewed objectively and confidentially, to the extent possible.

8. Enforcement and Accountability

Violations of this policy may result in:

- Disciplinary action.
- Termination of employment or contracts.
- Legal action where appropriate.

Accountability applies irrespective of seniority or role.

9. Governance and Oversight

Ethical conduct is overseen as part of overall governance and leadership responsibility.

We commit to:

- Periodic review of this policy.
- Strengthening controls where risks are identified.
- Avoiding defensive responses to ethical scrutiny.

10. Closing Statement

Ethical business conduct is not a competitive disadvantage, nor a branding exercise. It is a foundation for trust, resilience, and long-term value.

Compliance is required. Integrity is expected. Judgment is essential.