



NOCIL LIMITED

NOCIL Limited

# Fair Competition Policy

**For NOCIL LIMITED**

A handwritten signature in blue ink, appearing to read "S. R. Deo", written over a horizontal line.

**S. R. Deo**  
**Managing Director**

**Approved by Core Committee on Sustainability on 09.12.2022**



## FAIR COMPETITION POLICY

### OBJECTIVE

NOCIL Ltd (NOCIL) believes in conduct business in fair, ethical and transparent manner demonstrates zero tolerance towards “unfair methods of competition” and “unfair or deceptive acts or practices.” The Company considers it important to act professionally, fairly and with utmost integrity in all business dealings and relationships; whenever and wherever it operates or engages with competitors, suppliers, distributors, or any other members of our supply chain. The Company is endeavoured to ensure that it does not abuse its dominant position in the market so as to detrimentally impact free and fair competition.

### APPLICABLE LAW

The Competition Act, 2022 (and the Rules enacted thereunder)

### APPLICABILITY

This policy is applicable to all those employees/officers working at all levels and grades,(whether permanent, fixed-term or temporary), Consultants, contractors, trainees, interns, seconded staff, or any other person associated with our Company who are designated by the Managing Director in consultation with the Chief Compliance Officer from time to time (all of the aforesaid being collectively referred to as “Designated Employees/Persons ”).

### MONITORING & COMPLIANCE

The Chief Compliance Officer (CCO) for the purpose of this Policy shall be designated by the Managing Director with the following specific role:

- The CCO shall undertake periodic review and update this policy to reflect applicable law(s) and /or latest notifications released by the regulating authorities from time to time. The Company Secretary shall be under an obligation to apprise and inform the CCO about any regulatory changes or amendments in the Competition Law and the possible implications on Company’s business practices.
- Any clarifications regarding the applicability of this Policy in a particular situation or any ambiguity arising therefore may be escalated by the Designated employee to the CCO who shall be obliged to clarify the same. In this regard the CCO may seek expert guidance from the Company Secretary.





NOCIL LIMITED

- The CCO shall monitor the effectiveness and review the implementation of the compliance principles set forth in this policy, regularly considering its suitability, adequacy, and effectiveness.
- The CCO shall conduct periodic trainings of the Designated Employees/Persons for reinforcement of the principles captured in this policy

**NOCIL's STANDARDS FOR DEALINGS WITH COMPETITORS, DEALERS, SUPPLIER AND CUSTOMERS**

- 1) The Company shall comply with the provisions of the Competition Act in letter and spirit.
- 2) The Company shall not engage in improper practices that may limit competition through illegal and unfair means.
- 3) The Company shall not enter into agreements with competitors to engage in any anticompetitive behaviour, including setting prices or dividing up customers, suppliers, or markets.
- 4) The Company is committed to adhering to the Competition /Anti-Trust laws of all the countries where its finished goods are exported.
- 5) The Company does not participate in conversations with competitors that could be perceived as limiting competition for e.g., any matter relating to sales prices, marketing strategies, market shares and allocation of market, territories
- 6) The Company shall not disparage its competitors or their products and does not make false or misleading statements about them and ensure that all sales and promotional efforts are free from misrepresentations.
- 7) The Company shall not enter into agreements with competitors that affect prices they charge, as they may constitute illegal price-fixing.
- 8) The Company shall not enter into any agreements that are in restraint of trade, prices, quality of products or services or in any manner monopolize any part of trade or commerce by controlling the supply of a product or service with the intention to control its price or to exclude competitors from the market.
- 9) The Company shall not initiate, discuss, or encourage boycotts of specific products or services of customers or suppliers.
- 10) The Company would refrain from any attempts to be part of cartelisation with peers and/or through industry associations. If any industry partner approaches for the same, the same would need to be reported to the CCO.





NOCIL LIMITED

**Warning signs:**

- Formal or informal understandings or agreements with competitors that set prices, or allocate production, sales territories, products, customers, or suppliers.
- Decisions to terminate business relationships, pricing of a product below cost, and certain other pricing and promotion policies, especially when we have a substantial share of the market.
- Exchanging confidential information with competitors regarding pricing, marketing, production, or customers.
- Charging different prices to similarly situated customers.
- Discriminating unfairly between similarly situated customers.
- Formal or informal territorial restrictions on channel partners such as dealers and distributors

**For NOCIL LIMITED**

A handwritten signature in blue ink, appearing to read "S. R. Deo".

S. R. Deo  
Managing Director