



ANTI-BRIBERY POLICY
OF
APOLLO PIPES LIMITED

Version	Revision Date	Approved by	Date of Approval
1st Version		Board of Directors	25.07.2023

1. OBJECTIVE

The Objective of this policy is to set responsibility for the directors and employees of the Company to maintain high standard of business practices, ethics as well as to comply with the anti-corruption laws applicable in India.

Anti-Bribery Policy (the “Policy”) of Apollo Pipes Limited (hereinafter called as “Company”) has been developed in accordance with and in conformance with the legal and statutory framework of anti-corruption legislation prevalent in India.

Company is committed to the prevention, detection and deterrence of bribery and other corrupt business practices.

2. SCOPE AND APPLICABILITY

This Policy applies to all the directors and employees of the Company across all its functions and locations.

3. DEFINITION

Bribery is an offer, promise or receipt of any gift, hospitality, reward or any other advantage to induce or reward behavior which is dishonest, illegal, impartiality or not in good faith in the performance of a person's functions or activities;

Bribery includes not only direct payments, but also authorizing or permitting a third party to commit any of the acts or take any part in the actions identified above.

In this Policy, words importing the singular number shall include the plural number and words importing the masculine gender shall, where the context admits, include the feminine and neuter gender.

4. PRINCIPLE

No Director and employee of the Company shall not engage directly or indirectly in bribery of whatsoever in nature including the following:

- a) Kickbacks: Company must not make or accept kickbacks. Kickbacks are typically payments, made in cash or kind, in return for a business favour or advantage. A kickback is a form of corruption that involves two parties agreeing that a portion of their sales or profits will be kicked back (given back) to the purchasing party, in exchange for making the deal.
- b) Payment for facilitation: Company must not make payments for facilitation. We do not part in any of these, nor do we allow Third Parties acting on our behalf, such as merchants, vendors, agents, customers, consultants, alliance partners, suppliers and contractors to make any such payments.
- c) Gifts: The Policy does not prohibit normal, reasonable, appropriate, modest, bona fide corporate/ customary gifts (given or received), if its purpose is to improve the Company’s image, present products and services or establish cordial relations.

- d) Claims by employees for payments made by gift or hospitality: employees of Company need to take approval for making payments for gifts and hospitality of Third Parties or foreign public officials as per the Policy.

5. REPORTING AND ACTIONS

Any violation / non-adherence of the Policy shall be reported to the Chairman and Managing Director / Audit Committee of the Board who will take appropriate action(s) [including but not limited to termination of services].

6. MONITORING AND REVIEW

The Audit Committee of the Board will monitor and review the effectiveness of this Policy, considering suitability and adequacy.

7. PROTECTION

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken as per the findings of the investigating committee.

The Company shall ensure that no one suffers from any detrimental treatment as a result of refusing to take part in Bribery, or because of reporting in good faith their suspicion that an actual or potential Bribery has taken place, or may take place in future.

8. EXCLUSION

This Policy does not prohibit normal business/corporate hospitality, so long as it is responsible, appropriate, modest, and bona fide, or if its purpose is to improve image of the Company, its products, or establish cordial relations.

The Company may make donations but only if they are ethical and in compliance with this Policy and local applicable laws. No donation should be made which may, or may be perceived to breach applicable law, or any other section of this Policy.

Directors and employees of the Company are also prohibited from receiving gifts unless they are received in accordance with the Code.

9. AMENDMENTS

The Board reserves the right to vary and/or amend the terms of this Policy from time to time at its absolute discretion.