ANTI-BRIBERY POLICY OF APOLLO PIPES LIMITED

Version	Revision Date	Approved by	Date of Approval
1st Version	-	Board of Directors	25.07.2023
2nd Version	05-11-2026	Board of Directors	05-11-2026

1. POLICY STATEMENT

It is our policy to conduct business across Apollo Pipes Ltd. and its subsidiaries in an honest and ethical manner. We take a zero-tolerance approach to bribery, corruption, facilitation payments, and any improper inducements. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implement and enforce effective systems to counter bribery.
Through this policy, which is fully endorsed and supported by the Apollo Pipes Ltd. Board of Directors, we set out our responsibilities in observing and upholding our position on anti-bribery and corruption; and to provide information and guidance to everyone associated with us, including our employees and third parties, on how to deal with any bribery or corruption issues, should they arise when carrying out any activity on behalf of Apollo Pipes Ltd.

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, officers, permanent and contractual employees subsidiaries, and third parties engaged by or acting on behalf of the Company across all its functions and locations.

3. GOVERNANCE AND OVERSIGHT

The Board of Directors / Audit Committee provides oversight of the Company's anti-bribery and anti-corruption framework. Senior Management and Compliance function oversee implementation and reporting.

4. 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.

5. PRINCIPLE

Apollo Pipes adopts a strict zero-tolerance position on bribery, corruption, and any

form of improper influence.
All employees and third parties are required to comply with the following:

1. 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.
2. 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.
3. Do not request, accept, or receive any gift, money, hospitality, or anything of value that may be considered an improper advantage or influence. Bribery does not necessarily involve cash and may take any form of benefit.
4. Offering or promising anything of value to influence someone's actions or decisions is considered bribery. It is also considered bribery if done indirectly through third parties such as agents, sponsors, joint venture partners, customers, or suppliers.
5. Third parties are required to make best efforts to comply with this policy and implement appropriate anti-bribery and anti-corruption measures in their own operations where applicable.
6. All offers of bribes, requests for bribes or facilitation payments, including those not accepted, should be reported as soon as possible.

This statement is a summary of some of the key elements of our anti bribery and anti-corruption policy.

Books, Records, and Internal Controls: Accurate record-keeping and strong internal controls must be maintained. Off-book accounts, false entries, or misclassification of expenses are prohibited.

Gifts, Hospitality, Donations, and Sponsorships: Gifts and hospitality, if any, must be reasonable, infrequent, transparent, and for legitimate business purposes.

a. They must not influence, or appear to influence, business decisions.
b. Cash or cash equivalents are strictly prohibited.
c. Political contributions are prohibited unless expressly permitted by law and approved by the Board.
d. Charitable donations and sponsorships must be genuine, transparent, and approved as per internal governance processes.

Prohibited Conduct: The following are strictly prohibited:

e. Offering, promising, authorising, giving, or accepting bribes or kickbacks.
f. Offering anything of value to improperly influence a business or official decision.
g. Making or accepting facilitation payments, regardless of amount.
h. Using third parties to engage in prohibited conduct on behalf of the Company.
i. Concealing, mis recording, or falsifying transactions to disguise improper payments.

Training and Awareness

a. Periodic anti-bribery and anti-corruption mandatory training is provided to employees.
b. Enhanced or role-based training may be conducted for high-risk functions.
c. Awareness of this Policy forms part of the Company's ethical culture and compliance framework.

6. REPORTING OF CONCERNS AND ACTIONS AND HANDLING OF BREACHES

Any employee, director, contractor, or third party who becomes aware of, or suspects, any act of bribery, corruption, facilitation payment, or violation of this Policy is required to report the matter promptly and in good faith.

Such concerns may be reported through the designated reporting channels.

Reports may be made confidentially and, where permitted by law, anonymously. The Company assures that all reports will be reviewed objectively and investigated appropriately. No retaliation shall be taken against any individual who raises a concern in good faith, even if the concern is subsequently found to be unsubstantiated

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,recovery of losses, and reporting as per applicable laws and regulations.

7. MONITORING AND REVIEW

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

8. 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.

9. 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.

10. AMENDMENTS

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