BUSINESS RESPONSIBILITY POLICY OF **APOLLO PIPES LIMITED**

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Introduction

This Policy on Business Responsibility ('BR Policy' or 'Policy') has been framed pursuant to the requirements of Regulation 34 (as amended from time to time) of and other applicable provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') and is intended to ensure that the Company contributes towards sustainable development and fulfils its social, environmental and economical responsibilities.

This Policy reaffirms the Company's commitment to follow the principles and core elements, in conducting its business, as laid down in the National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business ("Guidelines") issued by the Ministry of Corporate Affairs towards conducting its business.
This policy applies to all employees and workers of the company. We encourage our partners to show the commitments stated in this Policy. The policy is endorsed by the board of directors.

Objective

The objective of this policy is to:
ensure a unified and common approach to the dimensions of the business responsibility across the Company; act as a strategic driver that will help the Company to respond to the complexities and challenges that keep emerging and be abreast with changes in regulations.

Principles of the policy

The Company believes that growth and stakeholders value creation can only be achieved by doing businesses on strong sustainability principles which address the dimensions of good governance as well as environmental and social responsibilities. The Company's business practices would, therefore, be regulated by the following principles:

Principle 1: Ethics, Transparency and Accountability

Business should conduct and govern themselves with Ethics, Transparency and Accountability.

The Company shall strive to maintain high standards of ethics in all spheres of its business activities. The Board of Directors and Senior Management strive and endeavor to set examples of utmost ethical behavior for all levels across the Company making it an essential part of the work culture so that every employee of the Company conducts himself and represents the Company with professionalism, honesty and integrity, and conform to high moral and ethical grounds. The following measures shall govern the policies and practices of the Company which shall strive to achieve ethical, transparent and accountable organization:

- The Company shall endeavor to develop necessary governance structures, procedures and practices that ensure ethical conduct at all levels; and promote the adoption of this principle across the Company's value chain.

- The Company shall truthfully discharge their responsibilities on financial and other mandatory disclosures.
- The Company should not engage in practices those are abusive, corrupt or anti-competition.
- The Company should communicate transparently and assure access to information about the decisions that impact relevant stakeholders.

Principle 2: Product Life Cycle Sustainability

Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

The Company endeavors to embed the principles of sustainability, as far as practicable, into the various stages of product lifecycle including procurement of raw material, manufacturing of product or delivery, transportation of raw materials and finished goods. The following measures shall govern the Product Life Cycle Sustainability of the Company:

1. The Company shall raise consumer awareness with regard to their rights, through education, product labeling, appropriate and helpful marketing communication, full details of the contents and composition and promotion of safe usage and disposal of their products.
2. The Company shall endeavor to assure safety and optimal resource use over the life-cycle of the product - from design to disposal and ensure that everyone connected with it - designers, producers, value chain members, customers and recyclers are aware of their responsibilities.

3. The Company should regularly review and endeavor to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.

4. The Company shall endeavor to work towards minimizing wastage of resources and promote optimum usage of resources including recycling of resources, wherever possible.

5. The Company should recognize and respect the rights of people who may be owners of traditional knowledge and other forms of intellectual property.

6. In designing the product, the Company shall ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.

7. The Company shall maintain a product quality management system designed to prevent, identify, and address product quality issues and defective products before delivery to customers.

8. Defect Prevention and Product Recall- The Company shall implement quality control and risk assessment processes to minimize product defects and reduce the likelihood of product recalls.

9. Internal Quality Audits: The Company shall conduct periodic internal audits to evaluate the effectiveness of its quality management system and identify opportunities for continual improvement.

10. Independent External Verification: The Company shall periodically subject its quality management system to independent external reviews, certifications, or verification to

assess compliance with applicable quality standards.

11. Training and Awareness: The Company shall provide regular training and awareness programs to employees to ensure their understanding of roles, responsibilities, and requirements under the quality management system.

12. Customer Complaint Mechanism: The Company shall maintain accessible mechanisms for customers and other external stakeholders to report concerns, complaints, or feedback relating to product quality and defective products.

13. Corrective and Preventive Actions: The Company shall investigate product quality incidents and customer complaints and implement appropriate corrective and preventive actions to address root causes and prevent recurrence.

Principle 3: Employee Well-being

Business should promote the well-being of all employees, including those in their value chains

The Company understands the worth of a healthy and sound human resource. The Company focuses on ensuring the well-being of all its employees. The Company shall ensure that there is a systematic chain or hierarchy which allows better flow of information, ideas, suggestions and understanding amongst the employees and the management and there is in place a proper channel through which the grievances of the employees are taken up and addressed by the management. The Company believes in giving its employees ample opportunities to perform as employee well-being is imperative to achieve a profitable growth. The following shall govern the Company's efforts towards Employee Wellbeing:

1. The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.
2. The Company shall provide and maintain equal opportunities to its board members irrespective of diversity factors such as gender, race, ethnicity, country of origin, nationality or cultural background in the board nomination process.
3. The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
4. The Company shall provide and maintain equal opportunities to its employees, job applicants and workers at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
5. The Company shall promote business practices that aims to employ local people at its operating sites.
6. The Company shall endeavor to take cognizance of the work-life balance of its employees, especially that of women.
7. The Company shall endeavor to provide facilities for the wellbeing of the employees including those with special needs.
8. The Company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
9. The Company shall endeavor to provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.
10. The Company shall endeavor to ensure continuous skill and competence up-gradation of all employees by providing access to necessary learning opportunities, on an equal and nondiscriminatory basis.
11. The Company shall promote employee morale and career development through enlightened human resource interventions.
12. The Company shall create systems and practices to ensure a harassment free

workplace where employees feel safe and secure in discharging their responsibilities.

Principle 4: Stakeholders Engagement

Business should respect the interest of and be responsive towards all stakeholders,

The Company values the support of its stakeholders and endeavours to maintain a cordial relationship and safeguard the interests of all the stakeholders. The Company recognizes its employees, business associates, shareholders/ investors and regulatory authorities as key stakeholders. The Company shall strive to its engage with them through various mechanisms such as consultations with local communities, suppliers/ vendor meets, employee satisfaction, investor forums, etc. The following shall govern the Company's efforts towards stakeholders' engagement:

The Company shall acknowledge, assume responsibility and be transparent about the impact of the policies and decisions on the stakeholders.
The Company shall systematically identify stakeholders, understanding their concerns, defining purpose and scope of engagement, and commitment to engage with them.
The Company shall endeavor to give special attention to stakeholders in areas that are underdeveloped.
The Company shall resolve differences with stakeholders in a just, fair and equitable manner.

Principle 5: Human Rights

Business should respect and promote human rights.

The Company appreciates and believes that human rights are inherent, universal, indivisible and interdependent in nature. The Company respects and promotes human rights for all individuals. The operations shall be conducted with honesty, integrity and openness with respect for human rights and interests of employees. The Company supports the principles contained within the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the ILO Core Conventions on Labour Standards. The following shall govern the Company's efforts towards ensuring respect for Human Rights:

1. The Board of Directors and senior management shall be mindful of human rights principles embedded in the Constitution of India while creating policies and practices of the organization.
2. The Company shall endeavor to integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.
3. The Company shall recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace.
4. The Company shall not be complicit with human rights abuses by a third party.
5. The Company shall not allow participation of or benefit from child labour and forced labour, including bonded labour, debt bondage, forced labour in penitentiary institutions, slavery or human trafficking.
6. The Company shall not allow, nor practice or support any type of discrimination based on race, colour, age, gender, nationality, sexual orientation, ethnic origin, disability, pregnancy, belief, political activism, union affiliation or marital status in contracts, hiring, remuneration or employment-related practices like promotions, bonuses, access to training, redundancy or retirement.

7. The Company shall evaluate and select suppliers and contractors as far as feasible, that there is no human rights policy violation in the Company's value chain.

Principle 6: Environment

Business should respect, protect and make efforts to restore the environment.

The Company places high priority in ensuring and adhering to best procedures relating to environment protection. While the Company being a manufacturing concern, its operation doesn't results into any major impact on the environment but it understand its responsibilities towards a sustainable environment. The Company commits to be responsible in the optimum utilization of available resources and reduction in the utilization of non-renewable resources. The following shall govern the Company's efforts towards ensuring a sustainable environment:

1. The Company shall utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
2. The Company shall endeavor to promote ecological sustainability and green initiatives by adopting cleaner production methods, environment friendly technologies, energy saving mechanisms, sensitizing employees to reduce carbon footprint of the Company.
3. The Company shall endeavor to take measures to check and prevent pollution and the Company should also access the environmental damage with due regard to public interest, wherever possible.
4. he Company shall endeavor to develop Environment Management Systems (EMS) and contingency plans and processes that help in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to our operations.
5. The Company shall also monitor environmental performance that help in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to our operations.
6. The Company shall endeavour to create environment awareness, enhance skill and competence of employees, suppliers, service providers and contractors so as to enable them to demonstrate their involvement, responsibility and accountability of sound environmental performance.
7. The Company shall set objective targets, develop, implement and maintain management standards and systems, and go beyond compliance of the relevant industry standards, legal and other requirements.
8. The Company shall promote tree plantation and protection of biodiversity at its locations to be in harmony with nature.
9. The company is dedicated to continually enhancing the governance of its environmental impact. We collaborate with stakeholders across our extended value chain others to advance environmental stewardship, enhance awareness of environmental challenges and to share best practices with other businesses. **Hazardous Substances Management**
10. The Company shall manage hazardous substances, if any, in a responsible manner to minimise potential environmental, health and safety impacts. The following commitments shall apply:
11. The Company shall implement a phased approach to reduce, replace or eliminate priority hazardous substances from its operations, processes and products within defined timelines, where technologically and economically feasible.
12. The Company shall dedicate appropriate research, development and technical resources to identify, evaluate and implement safer and environmentally preferable alternatives to hazardous substances.
13. The Company shall collaborate with industry associations, suppliers, technical experts and other relevant stakeholders to identify, evaluate and promote safer substitutes for

hazardous substances.

14. The Company shall ensure, as applicable, the safe procurement, handling, labelling, storage, transportation, use and disposal of hazardous substances in accordance with applicable legal and regulatory requirements.
15. The Company shall apply this commitment to its own operations and, where relevant, encourage suppliers, contractors and other business partners to adopt equivalent hazardous-substance management practices.
16. The Company shall periodically assess hazardous-substance risks and review related objectives, targets, implementation plans and performance to drive continuous improvement and take corrective or preventive action where necessary

Principle 7: Policy Advocacy

Business, when engaged in influencing public and regulatory policy, should do so in a manner that is responsible and transparent. The Company believes that a lot can be achieved if it works together with the Government, legislators, trade bodies and regulators to create positive social and environmental outcomes. The Company shall strive to create a positive impact in the business eco-system and communities by advocating best industry practices for the benefit of society at large. The Company, while persuading policy advocacy, shall ensure that their advocacy positions are consistent with the Principles and Core Elements contained in these Guidelines.

- To the extent possible, the Company shall endeavor to utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy.
- Public policy advocacy and engagement with government authorities, regulators and policymakers shall relate to legitimate business, industry, environmental or societal matters and shall be conducted lawfully, transparently and without bribery, improper influence or conflicts of interest.
- Memberships in trade associations and industry bodies shall support legitimate business or policy objectives. Material memberships, associated expenditure and significant advocacy positions shall be periodically reviewed for consistency with the Company's values and commitments.
- The Company shall seek to align climate-related advocacy, including advocacy conducted through trade associations, with its publicly stated climate commitments and the objectives of the Paris Agreement. Any misalignment shall be assessed and addressed through engagement, clarification, or review of continued membership.
- Material political contributions, public policy positions and trade association engagements shall be appropriately approved, recorded and periodically reported to senior management or the Board. The Company shall seek transparent disclosure of material expenditure, including nil amounts where relevant, and suspected breaches shall be reported through appropriate compliance or whistleblower channels.

Principle 8: Inclusive Growth

Business should support inclusive growth and equitable development

The Company considers the society as an integral part of its business and believes that it cannot work in isolation and therefore, as it grows, the society should also progress. In compliance with section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility

Policy) Rules, 2014, the Company has adopted a CSR Policy through which it undertakes the CSR projects in areas and subjects mentioned in Schedule VII of the Companies Act, 2013.

Principle 9: Consumer Value

Business should engage with and provide value to their customers and consumers in a responsible manner.

The Company acknowledges that no business can survive in absence of customers. The Company shall continuously strive to provide such goods to its consumers in a manner that creates value for both. The Company shall not indulge in any unfair or disruptive trade practice that can in any way and at any stage while selling its products affect the right of freedom of choice of customers from the range of other competitive products available in the market. The following shall govern the Company's efforts towards creating consumer value:

1. The Company shall ensure that they do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling the Company's products.
2. The Company shall endeavor to disclose of all information truthfully and factually as per applicable laws, through labelling and other means, including the risks to the individual to society from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner. Wherever necessary, the Company shall endeavor to also educate their customers on the safe and responsible usage of our products and services.
3. The Company, while serving the needs of their customers, shall take into account the overall well-being of the customers as well as society.
4. The Company shall promote and advertise their products in ways that do not mislead or confuse the consumers or violate any of principles in these guidelines.
5. The Company shall provide adequate grievance handling mechanisms to address customer concerns and feedback.

Implementation

The Managing Director ('MD') of the Company shall be responsible for implementation of the Policy. The MD may take support of such functional departmental heads and internal and external experts, which he may deem fit for effective implementation of the Policy.

Disclosure

This Policy shall be appropriately communicated within the Company across all levels and shall also be disclosed on the Company's website https://www.apollopipes.com/

Review/Amendment

This Policy may be amended by the Board, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the provisions of the Listing Regulations, from time to time. Any amendments in the Listing Regulations shall be binding even if not incorporated in this Policy.