SUPPLIER CODE OF CONDUCT

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

Apollo Pipes Limited (the 'Company') endeavors to conduct its business in a transparent and ethical manner, considering environmental sustainability and social responsibility. Therefore, Company aspires to integrate the best practices through its value chain.

Suppliers are an essential part of our business value chain and immensely contribute to Company's growth and company hopes to nurture long-term strategic partnerships in ensuring business sustainability.

This Supplier Code of Conduct is aligned with the principles outlined by the United Nations Global Compact (UNGC) such as anti-corruption, environment, human rights, labour. The principles and norms described under the theme of 'labour' are in line with the specified standards of International Labour Organization (ILO).

2. Scope and Applicability

This Code is applicable to all Suppliers, including, but not limited to those individuals and organization that directly or indirectly provide services, raw materials, finished goods or other products (hereinafter referred to as Suppliers) to Company.

3. Suppliers' compliance to this policy

This Supplier Code of Conduct has been developed based on standards globally recognized and best practices which are followed across industries. We trust all our suppliers to read, understand and affirm compliance with this Policy.

4. Ethics and Compliance with laws

i. **Conflict of interest:** Suppliers are expected to use good judgement and avoid situations which may lead to a conflict. Conflict of interest can undermine the trust placed by the Company on the Suppliers. Therefore, proactive measures must be taken to address any situation of potential conflict with Company or our employees.

ii. **Fair business, advertising, and competition**
Suppliers must uphold standards of fair business, advertising and competition and shall not engage in price fixing, collusion and/or unfair trade practices in violation of applicable anti-trust laws.

iii. **Statutory compliance**

Suppliers are required to comply with all statutory laws, regulations, and rules as per national guidelines. Suppliers shall maintain a record of all licenses, permits, approvals and must furnish copies of the same whenever requested by the Company.

iv. **Gifts and hospitality**

Suppliers must not offer any kind of gifts, free goods, services, or any other hospitality to any of our personnel, staff, or professionals under any contract with Company, with any mala fide intention. Suppliers shall promptly disclose any such requests made by personnel, staff, or professionals under any contract with the Company.

v. **Post-employment restrictions**

Suppliers shall not offer any direct or indirect employment to any of Company's personnel, staff or professional under any contract with Company who are actively engaged in procurement process with them for a period of one year following separation from the Company

vi. **Anti-corruption and bribery practices**

Suppliers shall ensure the highest standards of moral and ethical conduct. Suppliers shall not indulge in any corrupt practices defined under laws of international trade government authority/ organization and must comply with relevant anti-bribery and corruption laws such as Prevention of Money Laundering Act 2002 (India), Prevention of Corruption Act, 1988 (India), Proactive steps shall be taken to eliminate all forms of corrupt practices such as bribery, fraud, cheating or any other practice considered illegitimate with adequate awareness programs to educate employees.

vii. **Confidentiality**

Suppliers must protect business and personal information of a confidential nature obtained due to business relationship for performing jobs assigned by the Company and must not share such information with unauthorized persons in any manner. Company's confidential information includes, but is not limited to any proprietary information, employee information, personal data, and third-party information in Company's custody as shared by the Company.

5. Human rights and labour

i. **Protection of human rights**

Suppliers are advised to support and respect the protection of internationally recognized human rights such as adopting Universal Declaration of Human Rights (UDHR).

ii. **Indigenous culture**

Suppliers shall ensure that their operations are not adversely affecting any indigenous people, minorities (cultural, linguistic, and religious) and local communities. Proactive steps shall be taken to preserve local culture and communities.

iii. **Local communities**

Suppliers shall minimize or eliminate adverse impacts on local communities around their operations. Suppliers are advised to undertake stakeholder consultations to identify the needs and understand grievances of the local communities. Moreover, Suppliers shall also commit towards socio-economic upliftment of the local communities.

iv. **Protection of humane culture**

Suppliers shall ensure dignified and respectful treatment of all within the workplace free and shall not tolerate instances of harassment including verbal, psychological and sexual abuse, the use of threats of violence and/ or sexual exploitation and abuse by any of their employees, contractors, parent company and/ or business associates. Suppliers must effectively bring awareness and communicate with workers to ensure a dignified and respectful workplace by

having a written policy and providing grievance redressal mechanisms to address any concerns raised by employees.

v. **Wages and benefits**

Suppliers shall ensure that their employees are paid in alignment with applicable laws or regulations including, but not limited to minimum wages, deduction from wages, overtime hours and associated benefits as applicable. Overtime requirements if any must be based on business requirements and should be voluntary. Suppliers must provide components of pay structure to employees prior to recruitment and ensure that the compensation is competitive for the nature of work being performed. Recruitment, wages, and benefits must be in accordance with the principle of equal opportunity.

vi. **Working hours**

Suppliers shall ensure adherence to the prevailing regulations concerning working hours, overtime allowances, leaves, and other entitlements of their employees.

vii. **Child labour**

Suppliers shall prohibit employment of children below 18 years of age, or under the minimum age for employment in the country, whichever is greater. Established systems and processes are expected to be in place to verify the identity and age of their employees through verification of nationally accepted documents by the Suppliers or by contracting Third-party for the verification process, if necessary.

viii. **Forced or compulsory labour**

All forms of forced and compulsory labour shall be strictly prohibited. Suppliers shall comply with all slavery and human trafficking laws (Modern Slavery Act) and must ensure that adequate steps have been taken by the business operations to eliminate modern slavery and human trafficking practices. Suppliers are advised to develop and adopt practices to identify and take prompt corrective actions in any such instances. Moreover, Suppliers shall not confiscate or withhold worker identity documents including work permits and travel documentation of any of its workers/ employees.

ix. **Non-discrimination**

Suppliers shall eliminate all forms of discrimination at the workplace on grounds of race, color, age, gender, sexual orientation, religion, ethnicity, political opinion, nationality, social origin, disability, family status, or any such grounds as may be recognized under the applicable national laws as discriminatory. Suppliers must take proactive measures to ensure that all their employees are provided equal employment opportunities including but not limited to recruitment, promotion, training, remuneration and benefits and a conducive environment for growth which is free from any form of discrimination and harassment.

x. **Freedom of association and collective bargaining**

Company expects its Suppliers to respect and recognize the rights of its employees to freely associate and organize. Proactive steps shall be taken to promote fair working conditions as guided by international conventions as applicable.

xi. **Freedom of speech and expression**

Suppliers shall ensure an enabling environment in which all employees have the fundamental right to freedom of speech and expressions subject to the limitations of public order and mortality and company interest.

6. Health and Safety

Suppliers shall provide employees a healthy and safe workplace to ensure productivity, physical and mental wellbeing. Suppliers are expected to be compliant with all applicable health and safety laws, regulations and practices and must furnish copies of the same whenever requested by the Company.

Suppliers are advised to monitor and track essential health and safety indicators such as fatality rate, lost-time injury frequency rate and lost-time incident rate. Suppliers must take adequate steps to minimize hazards which may be inherent in their work environment by having processes in place and requirements such as occupational safety, emergency preparedness, machine safeguarding. Suppliers are encouraged to share best practices among their employees through conducting regular trainings on occupational health and safety.

7. Environment

Suppliers must comply with the disclosure of environmental parameters such as greenhouse gas emissions, air emissions, energy consumption, water use, waste generation, resource utilization, and biodiversity impacts, as required by applicable laws, regulations, and industry standards. Apollo Pipes is dedicated to fostering energy efficiency and resource efficiency among its suppliers and encourages them to monitor, manage, and, where feasible, reduce greenhouse gas emissions, optimize the use of natural resources, and adopt sustainable practices that benefit both the environment and their businesses.

8. Training and awareness programs

Company will conduct regular trainings among their suppliers to share best practices being followed by industry leaders and giving an opportunity to suppliers to showcase their practices. Selected suppliers will be expected to participate in these trainings.

9. Reporting concerns

The Company's endeavor is to foster an environment of open and honest communication. The Supplier shall be assured that an effective grievance procedure has been established to ensure that any worker/ employee, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

All reports are treated in a confidential manner and in the highest ethical regard. You may choose to remain anonymous while reporting.

In case of any potential violation or related queries please refer to the Grievance Redressal and Whistleblower Policy on the Company's website.

In case any violation of this Code is identified, the Supplier, at Company's discretion, would be given time to remediate the problem, with assistance from Company wherever possible. If the problem is not effectively addressed and within a clear timeframe which is acceptable to Company, then Company reserves the right to terminate its business relationship with the violating Supplier.

10. Suppliers' commitment

By accepting this Code of Conduct, it is implied that the Suppliers will ensure compliance of this Code.

The supplier is required to send their confirmation of having read, understood and acknowledged the Supplier Code of Conduct.