

TAX POLICY

<u>OF</u>

APOLLO PIPES LIMITED

Version	Revision Date	Approved by	Date of Approval
1st Version		Board of Directors	26.10.2023

TAX POLICY

Company Overview

Apollo Pipes Limited ('The Company") has been dedicated to delivering piping solutions, and serving its customers since its establishment in 1985. With five manufacturing facilities, the Company caters to a vast clientele spanning across the entirety of India, serving a strong distribution network of 700+ channel partners and 10,000+ customer touchpoints.

Introduction

Tax policy is a critical component, shaping the financial landscape for our business ventures. It encompasses a set of rules, regulations, and strategies designed to generate revenue, while also influencing economic behavior and social objectives. The current tax policy strictly complies with all relevant regulatory norms, and it is aligned to the Company's business ethics, value system and the risk management framework.

Applicability

The policy is applicable to all aspects of our Business, including our Stakeholders and value chain Partners.

Tax Policy

The policy comprises of the following:

Tax Compliance

Regulatory compliance is one of the key objectives for the company. The Company seeks to comply with tax filing, tax reporting, tax payments and disclose all relevant taxes transparently. The summary of the tax reports is made available to the Finance Team and is monitored at regular intervals.

Transfer Pricing

Apollo Pipes maintains ongoing adherence to transfer pricing regulations and conducts transactions in accordance with widely recognized arm's length principles. Furthermore, the Company complies with the necessary procedures for preparing and submitting a master file as mandated by regulatory standards.

Engagement with Government Authority

Apollo Pipes will cooperate and work closely with tax authorities, fostering a professional and transparent relationship. Occasionally, our perspectives (or those of our advisors) regarding the correct tax treatment in specific cases may not align with those of the tax authorities. In such situations, we are ready to engage in litigation if there is a disagreement with a tax authority's ruling or decision. However, our initial approach will always be to resolve any disputes through proactive, transparent discussions, and negotiations.

Tax Strategy

Apollo Pipes acknowledges its responsibility to fulfill tax obligations in every jurisdiction it operates within. When eligible, the Company may take advantage of tax incentives offered by local laws and

regulations, as long as they align with the Company's business and operational goals. The Company is committed to conducting its operations efficiently and in full compliance with the law, and it may seek external advice when dealing with complex or uncertain tax matters to ensure adherence to its tax strategy. As a fundamental policy, Apollo Pipes refrains from engaging in aggressive tax planning, condoning tax evasion, or supporting any individual or entity in facilitating tax evasion on its behalf.

Risk Management

As a company operating within a considerable network, Apollo Pipes faces various tax-related risks. To prevent disruptions in its business operations stemming from these tax risks, Apollo Pipes regularly conducts assessments to identify and evaluate potential tax liabilities. These assessments are then used to inform the company's management, enabling them to take appropriate measures for risk mitigation. When dealing with risks that involve considerable complexity or uncertainty, the company seeks external guidance. Furthermore, the Company actively collaborates with tax authorities to proactively address and resolve any issues, risks, or uncertainties related to its tax positions. This collaborative approach may involve seeking tax rulings, establishing advance pricing agreements, and other measures aimed at achieving greater tax certainty.

Review and Amendment

This policy will be reviewed periodically and accordingly revised to align with new regulatory laws and regulations.