

Anti Bribery and Anti-Corruption Policy

Last Revision Date: 1 Oct 2025

1. Policy Statement

It is our policy to conduct business across APL Apollo Tubes 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 APL Apollo 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 APL Apollo.

2. Scope and Applicability

This policy is applicable to all directors, officers, permanent and contractual employees, subsidiaries, and third parties engaged by or acting on behalf of the APL Apollo Group.

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. Basics

Any employee or third party who offers, accepts, or facilitates a bribe, facilitation payment, or any other unlawful inducement on behalf of APL Apollo may expose the Company to criminal liability. APL Apollo takes its legal and ethical obligations seriously and expects the same from all employees and third parties.

4. Principles and Requirements

APL Apollo 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:

- A. Do not offer, promise, authorize, or make any payment or transfer of value, including unreasonable / illegitimate gifts, hospitality, kickbacks, facilitation payments, or any other advantage to any individual or organization (including Public Officials) for the purpose of obtaining or retaining business or securing any improper advantage.
- B. Interactions with government officials must comply with applicable laws and ethical standards.
- C. 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.

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- D. 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.
- E. 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.
- F. All offers of bribes, requests for bribes or facilitation payments, including those not accepted, should be reported as soon as possible. Please send an email to the following address for reporting any violations: ethicsandcompliance@aplapollo.com.
- G. This statement is a summary of some of the key elements of our anti bribery and anti-corruption policy.
- H. **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.
- I. **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.
- J. **Prohibited Conduct:** The following are strictly prohibited:
 - a. Offering, promising, authorising, giving, or accepting bribes or kickbacks.
 - b. Offering anything of value to improperly influence a business or official decision.
 - c. Making or accepting facilitation payments, regardless of amount.
 - d. Using third parties to engage in prohibited conduct on behalf of the Company.
 - e. Concealing, misrecording, or falsifying transactions to disguise improper payments.

5. 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 Violations

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 channel at:

Email: ethicsandcompliance@aplapollo.com.

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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.

7. Disciplinary Action

Violations of this Policy may result in disciplinary action, including termination of employment or contracts, recovery of losses, and reporting as per applicable laws and regulations.

8. Policy Revision Date

This revised policy comes into effect from 1st October 2025.

For: APL Apollo Tubes Limited

Approved & Authorized By



Pankaj Sharma
Chief Human Resources Officer