

**HARIOM PIPE INDUSTRIES LIMITED**

**Anti-Trust and Anti-Competitive Policy**

## **Purpose**

Hariom Pipe Industries Limited (“HPIL”) trusts in developing long-term relationships with all its stakeholders and endeavour to create value for them through its fair practices. HPIL determines zero tolerance towards unfair methods of competition and unfair acts or practices. This policy provides guidance to all associates across HPIL about antitrust and competition laws and conducts business in fair, ethical and transparent manner. It is important that we act professionally, fairly and with utmost honesty in all our business dealings and relationships; whenever and wherever we operate or engage with competitors, suppliers, contractors or any other members of our supply chain.

## **Scope and Applicability**

This policy is applicable to all employees of HPIL, Board Members, suppliers, consultants, trainees, service providers of our company.

## **Policy Guidelines on Anti-trust/Anti-Competitive Practices**

- In today’s marketplace, competitors interact in many ways, through trade associations, professional groups, joint ventures, standard setting organizations, and other industry groups. HPIL encourages such dealings, provided they are fair, ethical and transparent in nature.
- Encourage the development and operation of competitive open markets and the liberalization of trade and investment in each country and market in which HPIL operates.
- Refrain from exchanging information with competitors on individualized intentions concerning future conduct regarding prices, quantities or other elements of competitive behaviour.
- Avoid entering into any activity constituting anti-competitive behaviour such as abuse of market dominance, collusion, participation in cartels or inappropriate exchange of information with competitors.
- All employees must be aware of antitrust risks in their interactions with competitors and must maintain caution at all the times during their dealings with competitors.
- Competitive information and/or intelligence, must only be collected through legal and ethical means such as published news, press releases, information available in the public domain, etc.
- HPIL shall not, under any circumstances, engage in Price Fixing<sup>1</sup> with any competitor(s) or supplier(s). HPIL will establish prices and other terms on its own, without agreeing with a competitor(s). Price Fixing does not relate only to prices, but also to other terms that affect prices to consumers and therefore, employees should not disclose any such information to the competitors.

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<sup>1</sup> Price fixing is an agreement (written, verbal, or inferred from conduct) among competitors that raises, lowers, or stabilizes prices or competitive terms.

- While dealing with the competitors never agree to set prices or allocate regions or product markets or customers nor engage in bid rigging and refrain from exchanging any such confidential, price sensitive and commercially sensitive information.
- Not take up or involve in any activities competing with the business of the Company.
- If any unauthorized or confidential information is received about/from a competitor, we must not use this information and notify the Legal Department / Compliance Officer immediately.

### **Breach of Policy**

Any violation of the policy guidelines set forth in this policy by any employee or any other persons / entity to whom this policy applies, may have significant consequences for the employee and HPIL, including potential prosecution, fines and other penalties for inappropriate conduct, as well as imprisonment and/or disciplinary action up to and including termination.

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