

HARIOM PIPE INDUSTRIES LIMITED

ANTI CORRUPTION AND ANTI BRIBERY POLICY

1. INTRODUCTION

We, at HARIOM PIPE INDUSTRIES LIMITED ("Company") conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to act 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. All our employees including designated persons (as defined below) are prohibited from engaging in any form of corruption and bribery. This includes a prohibition against both direct bribery and indirect bribery, including payments through third parties.

2. DEFINITIONS

As defined Prevention of Corruption Act, 1988, the Indian Penal Code, 1860 ("IPC"), Prevention of Money Laundering, 2002, Central Vigilance Commission Act, 2003, Lok Ayukta Acts of various states shall also apply to offences relating to or resulting in corruption and bribery and resolutions available.

- **Bribery** means to obtain or accept or attempt to obtain or promise for giving, receiving, soliciting or accepting of financial or other advantages, or any other thing of value, to influence or reward the behavior of a person who is in a position of trust to perform a public, commercial or legal function to retain or obtain a commercial advantage. Bribes are payments made in the form of money or anything else of value in return for a business favour or advantage.
- **Corruption** is dishonest, improper and usually unlawful conduct intended to secure a benefit undertaken by a person or organization entrusted with authority to attain illicit benefit or abuse power for one's private gain.
- **Facilitation payments** are unofficial payments made to secure or expedite a routine action by authorized official.
- **Kickbacks** are payments made in return for a business favor/advantage.
- **Gift** means any item of considerable value, given to/received from a party that has business dealings with the organization

3. OBJECTIVES

The purpose of this policy is to:

- Set out our responsibilities to comply with laws against bribery and corruption;

- Provide guidance on how to recognize and deal with bribery and corruption issues.

4. SCOPE

This policy applies to all dealings, transactions, and expenses for and on behalf of Company. This policy applies to all stakeholders working for or acting on behalf of Company or any of its subsidiaries. This includes senior managers, officers, directors, employees (whether regular, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located and any individual or organisation that an associate may come into contact with during the course of his/her engagement with the Company, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, business associates and government and public bodies including their advisors, representatives and officials, politicians and political parties.

5. POLICY STATEMENT

- The Company **strictly prohibits** any form of bribery or corruption.
- No employee or representative shall offer, give, receive, or solicit any undue advantage (including cash, gifts, hospitality, or favors) with the intention of gaining or retaining business or securing an unfair advantage.
- All business dealings must be conducted fairly, legally, and transparently.

6. GIFTS, HOSPITALITY & ENTERTAINMENT:

This policy does not prohibit normal business hospitality, so long as it is reasonable, appropriate, modest, and bona fide corporate hospitality, and if its purpose is to improve our company image, present our products and services, or establish cordial relations.

Gifts, Hospitality & Entertainment must be:

- Legal under all applicable anti-corruption laws.
- Duly approved. Normal business hospitality must always be approved at the appropriate level of management.
- Non-cash or a cash equivalent.
- Never given or accepted if any improper action is expected in return.
- Modest and promotional gifts are permitted. It is acceptable to offer modest promotional

- Materials to contacts e.g. branded pens. Use of one's position with the Company to solicit a gift of any kind is not acceptable. However, the Company allows associates occasionally to receive unsolicited gifts of a very low intrinsic value from business contacts provided the gift is given unconditionally and not in a manner that could influence any decision-making.

7. PROCEDURE TO RAISE YOUR CONCERN:

If any associate suspects or becomes aware of any potential bribery, it is the duty of that designated person to report their suspicion or awareness to the concerned person as may be decided by Audit Committee.

a) How to raise a concern

Every person, to whom this policy applies to, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage. If he/she is unsure whether a particular act constitutes bribery or corruption or if he / she has any other queries, these should be raised with their respective Manager and/or HOD either by e-Mail / written letter.

b) What to do if you are a victim of bribery and corruption?

It is his / her responsibility to inform / report it to their respective Manager and/or HOD via Email /letter as soon as possible if you are offered a bribe by a third party, you are asked to make one, suspect that this may happen in the future or believe that you are a victim of another form of corruption or other unlawful activity. You must refuse to accept or make the payment from or to a third party, explain our policy against accepting or making such payment and make it clear that the refusal is final and non-negotiable because of this Policy. If you encounter any difficulty making this refusal, you should seek assistance from your manager.

c) Protection

Those who refuse to accept or offer a bribe or those who raise concerns or report another's wrong-doing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corrupt activities or because of reporting their suspicion in good faith that an actual or potential bribery or other corruption offence has taken place or may take place in the future. If any employee believes that he / she has suffered any such treatment, he / she should inform the Manager or HOD concerned.

d) Maintaining Accurate Books and Records

No payment by or on behalf of the Company shall be approved or made if any part of the payment is to be used for an unlawful or improper purpose, or for any purpose other than that described by valid documents supporting the payment. No false or misleading entries should be made in any books or financial records of the Company for any reason. Any expenses that an employee or third party incurs on Company behalf or in connection with our business shall not be reimbursable unless they are lawful and supported by detailed documentation including, for example, valid invoices or receipts.

8. COMPLIANCE AND DISCIPLINARY ACTION

Any violation of this policy will result in disciplinary action, including possible termination of employment or contracts and legal action if applicable.

9. REVIEW

This policy will be reviewed periodically and updated as required to ensure compliance with applicable laws and evolving best practices.