		APL Apollo Tubes Ltd		Policy No- HR-APL-31	
Prepared : Name / Sign / Date JPS/ / 28th Feb 2018		Approved : Name /Sign / Date DG/ / 28th Feb 2018		Released : Name / Sign / Date JPS/ / 28th Feb 2018	
Language en		Page 1/ 2			
Resp. Function : HR		Takeover Function: HR	Revision 00	Doc. Type : Policy	File Name: Code of Conduct and Work Ethics Policy

Anti Bribery and Anti-Corruption Policy

1. Policy Statement

It is our policy to conduct business across the APL Apollo Tubes Ltd. and its subsidiaries in an honest and ethical manner. We take a zero-tolerance approach to bribery, corruption and the giving and receiving of bribes. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing 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. Who is covered by the policy?

This policy applies to APL Apollo employees globally, and third parties* that are in contact with APL Apollo during any business matter, either working for or on behalf of the APL Apollo Group.

3. Basics

Any employee or third party of APL Apollo that offers a bribe, facilitation payment or any other criminal inducement on behalf of the APL Apollo Group, may cause APL Apollo to be held criminally liable. We take our legal responsibility very seriously and require our employees to do the same.


4. Principles and Requirements

APL Apollo takes a zero-tolerance approach to bribery, corruption and the giving and receiving of bribes.

The Policy requires that our employees and third parties apply the following:

- Do not offer, promise, authorize or make any payment or transfer of value, including gift, hospitality or other advantage to anybody (including Public Officials) or organization, Kickbacks

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Resp. Function : HR	Takeover Function: HR	Revision 00	Doc. Type : Policy	File Name: Code of Conduct and Work Ethics Policy

and illicit payments including facilitation payments, for the purpose of obtaining or retaining business or any other unfair advantage are bribery.

- Do not accept, receive, request any kind of gift, money, anything of value, hospitality or any other unfair advantage or an improper purpose or performance of an activity. The act of bribery does not have to include money.
- Offering or promising to give something to influence someone's behaviour or actions is bribery. It is also bribery if done indirectly via any third party, including sponsors, joint venture partners, customers or suppliers.
- Breaches of this policy by an employee may result in APL Apollo taking disciplinary action and could lead to dismissal. Other laws and regulations globally must also be respected and followed. Failure to do so may result in a criminal offence and fines and imprisonment may apply.
- All third parties are required to use their best efforts to implement this policy and where applicable their own policies and procedures against bribery and corruption.
- 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: comsec@aplapollo.com.

This statement is a summary of some of the key elements of our anti bribery and anti-corruption policy.