

Anti-Corruption and Anti-Bribery Policy

Shriram Pistons and Rings Limited stands resolute in upholding the utmost standards of honesty, integrity, and ethical conduct across its global operations. This Anti-Corruption and Anti-Bribery Policy articulates the firm commitment to preventing, detecting, and addressing fraud, bribery, and unethical practices.

Objective:

Our goal is to instil a culture of zero tolerance towards bribery and corruption, ensuring transparent, ethical business practices that comply with legal standards and enhance our global reputation positively.

Scope:

This comprehensive policy, termed the anti-bribery and anti-corruption policy, applies to all individuals globally associated with Shriram Pistons and Rings Limited. This includes directors, senior executives, employees, consultants, contractors, and others. The term "Third Party(ies)" encompasses entities or individuals engaged while representing our organization. This incorporates past, present, and future customers, business partners, suppliers, consultants, intermediaries, representatives, subcontractors, agents, advisers, and joint ventures, as well as government and public bodies, including their officials, advisers, representatives, politicians, and political parties.

Definition:

A bribe is defined as any form of encouragement, money, reward, or benefit provided with the intention of gaining commercial, contractual, legal, or personal advantages. The direct or indirect offer or acceptance of bribes is strictly prohibited, and bribing a public official or government member constitutes a distinct criminal offence.

The term "bribe" encompasses anything of value, whether given directly or indirectly through a third party. This includes cash, cash equivalents, gifts, insider information, sexual favours, corporate hospitality or entertainment, offering employment to a relative, and payment or reimbursement of travel expenses. The definition of a "government/public official" extends to any employee or official, elected or appointed, in legislative, administrative, or judicial positions. This definition also covers candidates, representatives of government-owned companies, and representatives of political parties.

Corruption involves the misconduct of authority figures or individuals in influential positions through illegal, immoral, or unethical methods. Bribery and patronage are commonly associated with corrupt practices.

Third-Party Relations:

Shriram Pistons and Rings Limited expects Third Parties engaged in business to adhere to its anti-bribery and anti-corruption guidelines. Sustaining a relationship with the company requires Third Parties to actively address these issues and collaborate to ensure compliance.

Upholding integrity in interactions mandates thorough due diligence, and evaluating the integrity records of Third Parties before initiating any business ties. The engagement process and final approval of Third Party selection should be meticulously documented to maintain the highest standards of integrity.

Protection and protocol to raise complaints:

In our company, we understand that individuals may worry about repercussions when refusing bribes, reporting concerns, or rejecting misconduct. We actively endorse transparency and support anyone sincerely raising concerns in good faith, even if later found unfounded. Our commitment ensures no adverse treatment for refusing bribery or reporting suspicions, regardless of timing.

If you believe you've faced unfavourable treatment, promptly contact [email address] or your manager. We steadfastly cultivate a culture of trust, integrity, and confidence for all employees to voice concerns without fearing retaliation. This commitment spans past, present, and future scenarios, emphasizing our dedication to a workplace where ethical practices are upheld without compromise.

Action and Training :

To achieve our "Zero Tolerance" goal against corruption, we'll rigorously adhere to all Rules & Regulations. Comprehensive training ensures every employee is well-versed in these guidelines, reinforcing our commitment to prevent corruption.

The Senior Management team, led by the Head of Locations, is dedicated to promoting awareness of the Company's Good Corporate Governance policy. This joint effort aims to foster a culture of integrity and ethical conduct throughout the organization.

Board Level Oversight:

The MD / CEO holds the ultimate responsibility for ensuring policy alignment with legal and ethical obligations. Managers at every level ensure their subordinates



not only comprehend but actively implement the policy, with a vigilant eye on monitoring compliance.

Compliance:

All employees, contractors, and third parties are unequivocally required to adhere to this policy. Non-compliance may result in disciplinary measures, including termination.

Provision for Review/Amendment:

This policy will be reviewed annually and updated as needed to address emerging threats or changes in business operations.

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KRISHNAKUMAR SRINIVASAN
MD & CEO

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