

SHRIRAM PISTONS & RINGS LIMITED: NEW DELHI

Anti-Corruption and Anti-Bribery Policy

1. Purpose:

Shriram Pistons & Rings Limited (SPRL) stands resolute in upholding the utmost standards of integrity, transparency, accountability and ethical conduct across its global operations. This policy aims to prevent, detect, and address any form of bribery and corruption, ensuring full compliance with applicable laws and regulations.

2. Objective:

The objective of this policy is to instil a culture of zero tolerance towards bribery and corruption within SPRL by ensuring adherence to transparent, ethical business practices. This policy aims to:

- Promote integrity and ethical decision-making across all operations.
- Ensure compliance with local and international anti-bribery laws.
- Establish clear guidelines for employees and third parties regarding acceptable conduct.
- Prevent, detect, and address corruption-related risks effectively.
- Safeguard SPRL's reputation and maintain stakeholder trust.

3. Scope:

This policy applies to all individuals globally associated with SPRL which includes directors, senior executives, employees, consultants, contractors, and other third parties. 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.

4. Reporting Mechanism

- **Filing of Complaint:** Complaints can be submitted to HR or the Compliance Officer at compliance.officer@shrirampistons.com which shall be acknowledged by the concerned authority within a reasonable time.
- **Review of Complaint:** An initial review will be conducted to determine the steps, etc. to ensure a fair and impartial investigation.
- **Outcome:** Findings and decisions will be communicated to the concerned parties after the investigation and necessary actions.

5. Training and Awareness:

To achieve our "Zero Tolerance" goal against corruption, SPRL adhere to all Rules & Regulations. Regular comprehensive training ensures every employee is well-versed in these guidelines, reinforcing the commitment to prevent corruption.

6. Compliance:

All employees, contractors, and third parties are unequivocally required to adhere to this policy. Non-compliance may result in disciplinary measures, including termination and legal consequences as per applicable anti-bribery laws.

7. Provision for Review:

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

Approving Authority:

Sd/-

Krishnakumar Srinivasan

MD & CEO

Effective Date: April 1, 2025