



# Apollo Tyres Ltd

## Code of Conduct

Document Owner: Chief Business Officer

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## Contents

Message from VCMD .....	3
Policy Terms .....	4
Introduction to the Code of Conduct – Our Values .....	6
Following Our Passion .....	8
Being Responsible .....	10
One Family .....	22
Annexure .....	25

## Message from VCMD



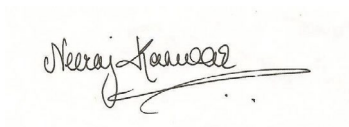
As Apollo Tyres continues on its journey of Internationalisation, we aim to build on the reputation that we have established over the last five decades. Our reputation affects many aspects of our business - how our customers feel about our products; whether investors want to buy our shares; how business partners perceive us; and whether employees find Apollo Tyres a great place to work. For this reason, it is important that we maintain and enhance our reputation through strong integrity and ethical conduct. This Code of Conduct is designed as a guide to support you to undertake your work in line with the Apollo Values, Internal Policies and the Laws/Regulations that exist in the countries where we do business. To obtain a high level of ethics and integrity does not purely mean compliance with policies and laws, it also means leading by example in the way we do business and in the way that we behave towards colleagues, candidates, clients, business partners and investors.

Not following the Code may result in breaches of law and regulations and a loss of reputation. For individuals, it could also mean disciplinary action or dismissal. It is therefore essential that you familiarise yourself with the Code and make following it a daily habit.

If you have any queries or concerns about what the Code means or how you should behave in any situation, it is important that you seek guidance from HR or the Compliance Officer.

Similarly, if you believe the Code has been broken by anyone in the company, we encourage you to raise it through the reporting process in the knowledge that we will not tolerate retaliation of any kind from anyone.

I am relying on each of you to play your part in ensuring that Apollo Tyres continues to be a company we can all be proud of.



Neeraj Kanwar

Vice Chairman and Managing Director

## Policy Terms

### **Owner of the Code of Conduct Policy (known as “Policy” or “The Code”)**

Chief Business Officer

### **Exceptions**

Any exceptions to the norms laid down in this Code may be at the discretion of the Managing Directors or any appropriate authority delegated by them.

### **Definitions**

The definitions used throughout the Code of Conduct are included in the final section.

### **Amendments**

- A. The Code of Conduct may be amended from time to time by the Board based on the recommendation of the Business Responsibility and Sustainability Committee.
- B. The Policy Owner is also authorized to make amendment in this policy in case of any amendment(s), clarification(s), circular(s), etc. issued by the statutory authorities, necessitating the amendment in the policy.
- C. It is the responsibility of the Policy Owner to ensure effective communication of the Code of Conduct.

### **Applicability**

The Code applies to all employees (i.e. employees with permanent or fixed term contracts, including senior executive (managerial) contracts and also temporary agency workers, 'Employees' or 'colleagues') working for Apollo Tyres Ltd ('ATL' or 'Company' or 'Apollo Tyres') including associates, subsidiaries or joint ventures, no matter where you are located in the world.

This Policy have been effective from 1st September 2017 and shall be amended from time to time.

Working at Apollo Tyres puts you in a position of trust and responsibility to uphold our values when dealing with colleagues, customers, suppliers, shareholders, the environment and our local communities. The Managing Directors and Senior Management are also required to adhere to the Code of Conduct for Directors and Senior Management and the code is available on Company's Intranet.

### **Affirmation of the Policy**

This Policy is an internal policy of the Company and is distributed in support and accordance with local applicable laws and practices.

The Company shall report on the status of its adoption of this policy as internally and statutorily required. The Company shall encourage its business associates and partners to abide by this policy.

### **Violation of the Policy**

Violation of this policy by Company employees can lead to disciplinary action up to and including termination. Disciplinary actions may include immediate termination of employment at the Company's sole discretion. Where the Company has suffered a loss, it may pursue legal actions against the individuals or entities responsible.

## Introduction to the Code of Conduct – Our Values

At Apollo Tyres, we are committed to our core values of 'Following our Passion', 'One Family' and 'Taking Responsibility'. They are key to the way we work and interact with our customers, suppliers and colleagues across the business. Our Code of Conduct sets out key Company policies that outline the standards and behaviours that help to shape and strengthen our culture. All colleagues are expected to uphold these high standards wherever in the world we conduct business, ensuring that our values are maintained.

### How do I comply with the Code?

This Code, although comprehensive, is not exhaustive in defining every situation you may face as an employee, so employees should use common sense when referring to the Code. Our values, behaviours and ways of working are core to Apollo Tyres and each of us are responsible for upholding the values to which the Company is committed.

As an employee of Apollo Tyres, you are required to read, understand and adhere to the Code and the policies it refers to. We all have a responsibility to protect the Company's reputation in everything we do and say. We want you to understand why this is important and what is expected of all employees. If you require more information, speak to your line manager.

You should read the Code carefully and refer to it if facing an ethical and compliance related issue. It is essential to create a supportive environment in which you feel able to raise concerns internally without fear of disciplinary action. If you have any concerns or something you come across doesn't feel right, speak up.

### What are managers expected to do?

Managers have additional responsibilities under the Code to:

- Act as role models in following the Code of Conduct in its true spirit.
- Ensure the Code is understood by those they manage.
- Provide advice and guidance on interpreting the Code, if required.
- Uphold and promote the requirements of the Code.
- Complete the annual declaration of their compliance with the Code.

### The role of the HR Business Partner in helping us manage our business ethics

HR Business Partners have a special responsibility in supporting employees understanding of the Code, exploring workplace concerns and how they may be resolved. More information on this is included in the 'Reporting of Breaches of the Code of Conduct' policy (Refer Annexure to this code).

### How to raise a concern or ask a question?

Apollo Tyres aims to conduct business with the highest standards of ethics, honesty and integrity, and recognises that you have an important role to play in maintaining this aim. Any employee or worker providing services to Apollo Tyres and concerned about any form of malpractice, improper action or wrongdoing by the Company, its employees or other stakeholders is strongly encouraged to report the matter. We believe it is essential to create an environment in which

individuals feel able to raise any matters of genuine concern internally without fear of disciplinary action being taken against them, and for the individuals to feel that these matters will be taken seriously and investigated appropriately, and as far as practicable be kept confidential. If in any Geography there is a local Whistle Blower policy in place, that policy will prevail.

Apollo Tyres believes that any employee with knowledge of wrongdoing should not remain silent. We take all matters of malpractice, improper action or wrongdoing very seriously and you are strongly encouraged to raise incidents or behaviours that are not in accordance with the Code, or the policies to which it refers. More information on this is included in the 'Reporting of Breaches of the Code of Conduct' policy (Refer Annexure to this code).

## Following Our Passion

We champion ideas that inspire us to think big, be brave and challenge the ordinary. We set our goals with purpose and make a genuine commitment to achieving it. Amongst them is to service our customers, as our priority.

Apollo Tyres values the loyalty and confidence of its customers above all else. We believe that our customers and those whom they serve are central to everything we do.

We set our goals with purpose and make a genuine commitment to achieving it.

### Quality and Safety

In order to meet or exceed our customers' expectation, we:

- Take personal accountability for the success of our business by reporting (or addressing, if you have quality and safety responsibilities) any quality and safety issue or concern immediately.
- Never bypass quality controls or take shortcuts that compromise the quality or safety of our tyres.
- Use a fact-based approach to continually improve systems and processes, which create excellence in product and service quality, minimizes environmental impact, safeguards employee health and safety, and strives to exceed requirements and expectations of our customers, business partners and statutory authorities.

### Customer Safety

The health and safety of customers is of utmost importance to us. Apollo Tyres strives to provide the highest quality products to its customers. It is equally concerned about their safety and adheres to international standards of product safety.

- The Company shall exercise due care and caution while providing goods and services.
- It is constantly looking for customized solutions and innovations to give our customers the best and safest product experience.
- Immediately report any threats to customer safety to management so that appropriate and prompt action can be taken.



We are proactive in seeking and responding to feedback and strive to go the extra mile.

### **Customer Care**

Apollo Tyres recognizes the responsibility to care for its customers. The Company is committed to provide the high and consistent levels of service to its customers. It subscribes to the philosophy that the customer is the reason we exist, and treats all its customers with the utmost respect and courtesy.

- The Company raises the customer's awareness of their rights through education, product labelling and appropriate marketing communication.
- It seeks to completely eliminate the scope of complaints of its products and services.
- It will promote and champion initiatives and projects which seek to augment customer engagement, create awareness and customer retention by ensuring that customers are happy, safe and knowledgeable about the products.

The Company will always try to:

- Make sure its labelling, advertising and other forms of communication are clear and accurate and it will always work to respect cultural and ethical beliefs.
- Welcome customer feedback and try wherever possible to act on it to continually improve the services it offers.
- Make sure any complaints are managed fairly and professionally within appropriate timescales.
- Information that it holds about its customers will be handled properly and responsibly. It is the Company's responsibility to protect its customer's personal data.

## Being Responsible

We are committed to building a responsible and sustainable business that benefits society.

We are actively concerned about the health and safety of employees, customers, and business partners.

We will not compromise the health and safety of our employees. We provide a healthy workplace that is safe, hygienic and humane which upholds the dignity of employees. It also complies with applicable safety and health laws, regulations and internal requirements.

We are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks. It is committed to engaging with employees to continually improve health and safety in workplaces, including the identification of hazards and remediation of health and safety issues. The employees of the Company are trained accordingly.

### Health & Safety

Together we are committed to highest safety standards to make sure we return safe and healthy to our families. **Our health & safety mission is Achieving well-being with always and absolute safety.** The Company has a responsibility under legislation to protect the health, safety and welfare of all colleagues, customers and contractors in its premises. Each employee has the responsibility to act and conform to the local safety regulations of each company location. We must all ensure that safety absolutes, safety standards and procedures are complied with to establish safe workplace for yourself and others, e.g. contractors, colleagues, visitors and suppliers.

As a company it strives to continuously improve its safety performance by measuring, evaluating and reporting safety related key performance lagging and leading indicators.

Managers have a responsibility to make sure employees are aware of Health & Safety regulations and the need to report all accidents and dangerous occurrences to the appropriate person or department.

We work closely with communities, aimed at bringing a positive difference to their everyday life and we protect the environment to create an overall positive impact on the ecosystem.

## **Sustainability**

Sustainability is deeply inherent in our vision 2026 as its one of the key pillars. The organisation is working to achieve Sustainability across its operations and value chain by promoting sustainable consumption of natural resources, and not encouraging practices that lead to excessive conspicuous consumption. In order to drive the work under this pillar, the organisation has set up a Senior level Steering Sustainability Committee. The Committee ensures that the policies, systems and approaches are incorporated to achieve positive impact across the entire value chain. For more information, please refer to the Sustainability Statement of the Organisation.

### **Sustainability Statement:**

Apollo Tyres will continuously work towards achieving sustainability across its operations and value chain. We will strive to minimize the environmental and social impacts of our business activities while creating value for our stakeholders.

The Apollo Way becomes the guiding principles of our sustainability agenda:

1. Driven through corporate governance, transparency and accountability.
2. Committed to develop environment friendly and safe products and services for our customers.
3. Striving towards highest environment, health & safety standard in our manufacturing processes and operations.
4. Ensure the partners participation in reducing the environmental and social impacts within our value chain and influencing the value chain in adopting sustainable practices.
5. Integrating international standards on Human Rights within our operations.
6. Ensuring compliance of international norms on decent work agenda and encouraging our 'One Family' culture in our operations.
7. Commitment to our communities around our operations towards inclusive growth.

Our management approach integrates resource management, business ethics and inclusive growth agenda for sustainable development in our regions and geographies. Our sustainability governance framework provides for both identification of key material issues, risks and opportunities of the organisation and its key stakeholders; and strategies to address them. The organisation is committed towards allocating necessary resources to meet the sustainability agenda.

### **Protecting the Environment**

The Company is environmentally conscious and supports initiatives and measures that contribute towards environmental conservation and the well-being of its surrounding ecosystem.

For more information, please refer to the Environment Policy available on Company's Intranet.

## **Corporate Social Responsibility (CSR)**

The CSR approach stems from our vision statement focusing on “continuously enhancing stakeholder value”, which includes the larger society and environment in which the Company operates. The CSR philosophy of the company rests on the principle of sustainability and self-reliance. It also embeds a dimension of philanthropy. At the core of Apollo’s responsibility belief is stakeholder engagement. Consequently all the projects the company has link to its stakeholders, the issues they face and the issues organisation has identified to support on philanthropy front. For more information, please refer to the “Corporate Social Responsibility Policy” available on the Company’s Intranet.

### **Sustainable Procurement Practices**

Sustainable procurement is procurement that has the most positive environmental, social and economic impacts possible across the entire life cycle and that strives to minimize adverse impacts. In this regard, it integrates requirements, specifications and criteria that are compatible and in favour of the protection of environment, social progress and economic development, namely by seeking resource efficiency, improving the quality of products and services and ultimately optimizing costs in its upstream supply chain.

Apollo Tyres’ Sustainable Procurement Components are made up of three (3) sections: Sustainable Procurement Vision, Sustainable Procurement Policy and Sustainable Procurement Guiding Principles:

**Sustainable Procurement Vision:** “Apollo Tyres shall work towards minimizing the environmental and social impacts to its business by adopting sustainable procurement policies and in this regard ensure the suppliers’ participation in promoting sustainable practices in the raw material supply chain. We shall ensure strong sustainability governance framework that provides for both identification of key material issues, risks and opportunities arising in the raw material supply chain; and strategies to address them.”

In line with ATL’s sustainability vision, it continuously works towards achieving sustainability across its operations and value chain. It aims to achieve so, by adopting sustainable procurement policies and by ensuring the partner’s participation in promoting sustainable practices in our core processes.

**Sustainable Procurement Policy:** It considers its suppliers as long-term business partners and is committed to conducting its business affairs in a fair and ethical manner that promotes open and fair competition in its best interests and that of its suppliers. It strives to continuously enhance customer satisfaction by providing cost effective and quality materials on a timely basis, while working together with its supply chain partners on environmental, economic and social aspects to enable sustainable business practices.

**Sustainable Procurement Guiding Principles:** The guiding principles for sustainable procurement of Apollo Tyres is as follows:

1. Driving through governance, transparency and accountability.
2. Enhanced usage of recycled and renewable raw materials in its products including encouraging its raw material supply chain partners in increasing the content of their recycled & renewable raw materials in their manufacturing processes.
3. Striving towards highest environment, health & safety standard in the raw material vendor partner’s manufacturing processes and operations and to work towards applicable certifications in their respective industries.
4. Integrating international and domestic standards on Human Rights as applicable within the raw material vendor partner’s operations.
5. Ensuring compliance of international norms on decent work agenda and

encouraging its 'One Family' culture in the raw material supply chain.

6. Work on Natural Rubber Sustainability in line with the GPSNR guidelines to drive improvements in the Social, Economic and Environmental performance of Natural Rubber supply chain.
7. Driving continual improvement in sustainable procurement agenda in the raw material supply chain.

Apollo Tyres believes that supply chain is a key contributor in the development and implementation of its Corporate Social Responsibility and Sustainability programmes, and expects its Business Partners to show concern for social and environmental responsibility as they conduct their business. Its endeavour is to work jointly with Partners to promote and encourage compliance with Apollo Partnership Pact (APP).

It is also working with the Global Platform for Sustainable Natural Rubber [GPSNR] promoted by the World Business Council on Sustainable Development [WBCSD] to contribute to the improvement of Socio-Economic factors in Natural Rubber supply chain. Natural rubber suppliers supplying to Apollo Tyres are expected to comply with the Apollo Sustainable Natural Rubber policy (ASNRP).

We fulfil our business commitments with transparency and honesty.

### **Doing Business Globally**

As a global company doing business around the world, it is committed to complying with applicable laws that govern international trade.

As it does business in many countries around the world, it is subject to numerous international trade laws. These laws can affect its ability to sell tyres and conduct business with certain countries and individuals. The laws are complicated and may change, and penalties for violations can be severe, including fines, revocation of permits or even imprisonment. It has to take particular care in relation to import and export controls, trade sanctions and boycotts.

If you are involved in the sale, marketing, distribution or transportation of products, or the transfer of technology across international borders, you must:

- Be familiar with and comply with all applicable laws and company policies regarding international trade restrictions (See Fair Competition section for more information).
- Notify the relevant department for your region/business area if you receive any trade-related issues or requests from customers, suppliers or others to participate in a boycott against individuals, companies or countries.

### **Related Party Transactions (RPTs)**

The Company has a policy on related party transactions to ensure the proper approval and reporting of transactions between the Company and its Related Parties and the same is available on Company's Intranet.

### **Anti- Bribery & Corruption**

This type of conduct is absolutely prohibited whether committed by employees or anyone else acting on the Company's behalf. This area of the Code prohibits direct or indirect payments, gifts or inducements of any kind to and received from any person, including officials, customers and suppliers. Example may include:

- A government official at national, state or local level including government companies and public sector enterprises.
- Employees, relatives or friends to gain a benefit that may include approvals, licences and permits.
- You should not get involved in any business transactions that could result in you obtaining a personal benefit.

The areas of business where corruption, including bribery, can most often occur include gifts & donations, the procurement process and facilitation payments. The Company operates a zero-tolerance approach to the making or receiving of bribes or corrupt payments, in any form.

- It does not give or accept payments or gifts in order to conduct business anywhere in the world.
- It agrees to the terms of supplier payments at the start of business and pay in accordance with the contractual obligations.
- You should not use your position as an Apollo Tyres employee to get discounts from contractors/suppliers unless they are corporate agreed discounts notified and made available to all employees, or do personal business, unless expressly authorised by management.

### **Gifts & Donations**

Apollo Tyres and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended to, or perceived to obtain business or uncompetitive favours for the conduct of its business. However, Apollo Tyres, where laws permit, allows authorised employees to accept and offer nominal gifts, which are customarily given and are of commemorative nature for special events. Under these circumstances, gifts and donations are acceptable if they are reasonable, proportionate and made in good faith and in compliance with the Company policies.

### **Procurement Process**

Supplier selection should never be based on receipt of a gift, hospitality or payment. When supplier selection is a formal, structured invitation for the supply of products or services (often called a 'tender'), it is most important employees maintain documentation supporting internal controls. In the public sector, such a tender process may be required and determined in detail by law to ensure that such competition for the use of public money is open, fair and free from corruption.

A tender process includes an invitation for other parties to make a proposal, on the understanding that any competition for the relevant contract must be conducted in response to the tender, no parties having the unfair advantage of separate, prior, closed-door negotiations for the contract where a bidding process is open to all qualified bidders and where the sealed bids are in the open for scrutiny and are chosen on the basis of price and quality.

### **Facilitation Payments**

Sums paid to government officials to facilitate or expedite nondiscretionary government actions of a routine nature are considered as facilitation payments. Facilitation payments are not allowed. If employees are unsure whether certain payments represent facilitation payments, they are required to contact their Line Manager, HRBP or Compliance Officer.

### **Books, Records and Internal Control Requirements**

Expenses must never be hidden or purposefully misclassified. Many serious bribery and corruption scenarios are found to involve inaccurate recordkeeping. To prevent this, there must be accurate accounting records for all financial transactions, including cash and bank accounts. All business units must maintain an effective system of internal control and monitoring of their transactions. It is your responsibility to be knowledgeable of control procedures and ensure compliance.

### **Fraud**

Fraud is deemed gross misconduct. Disciplinary procedures will be rigorously applied to any instances of fraud and are likely to result in dismissal.

The Company defines Fraud as the deliberate action by any person, or deliberately allowing an action to be taken, to create, falsify, destroy, deface, or conceal any account, balance, record or document, or impersonate, deceive, or misuse their position with the intention of:

- Obtaining money, assets, services, information or any other benefit which would otherwise be denied.
- Distorting personal or business performance.
- Causing a loss to the Company or another party (e.g. supplier, third party contractor, customer or employee).
- Prejudicing the Company's rights, competitive position or business reputation, or those of another party (as above).
- Attempting or assisting in any of the above.

You must follow Company procedures when dealing with the Company's property, goods and cash. When dealing with financial transactions you must also follow the relevant Company policies. When travelling and claiming expenses you must follow the Business Travel and Expenses Policy for your region/business area.

### **Money Laundering**

Money laundering generally occurs when funds from illegitimate sources are brought into legitimate financial channels to hide them or make them appear legitimate.

Apollo Tyres complies with all laws that prohibit money laundering or financing for illegal or illegitimate purposes.

You should always ensure that you are conducting business with reputable customers, for legitimate business purposes, with legitimate funds. Check for 'red flags' such as requests from a potential customer or supplier for cash payments or other unusual payment terms. If you suspect money-laundering activities, report it.

If you suspect your customer or supplier is engaged in an illegal activity, report it to the HR Business Partner for your region/business area or see the Reporting of Breaches to the Code of Conduct policy (Refer Annexure to this code).

### **Government Agencies**

The Company's business is in a highly regulated sector and employees engaged in working with government agencies like regulators, taxation officials, local authorities and such are required to build relationship of trust based on transparency and fairness at all levels.

When dealing with government, employees must:

- Ensure that the highest standards of business conduct are followed.
- Contact or engage with the relevant government agency only if authorized to do so on behalf of the company.
- If in doubt, escalate the matter to your seniors; do not attempt to resolve on your own.
- When seeking resolution or clarification of various legal issues, ensure all engagements must be in line with normal business conduct and based on merit.
- Be careful to provide accurate and complete data when information or documents relating to the company are sought.
- Co-operate fully and courteously with officials who are authorized to conduct an investigation or inquiry or seek information or data.
- Retain and preserve all relevant information and data for reporting, compliance or investigation.

Apollo Tyres employees must not:

- Attempt to exert undue influence to obtain a favourable decision.
- Knowingly destroy, alter and conceal any records or data in physical/ electronic form.
- Obstruct directly or otherwise access to information or records that are sought.
- Provide false or misleading information or create false data or records.

### **Corporate Governance**

All employees of Apollo Tyres should sincerely follow the philosophy of good corporate governance by possessing strong business fundamentals and delivering high performance through relentless focus on transparency, accountability, compliance with applicable laws and regulations, professionalization, and corporate social responsibility for enhancing shareholders' value and contributing to society at large.

We adhere to internal work processes with discipline and integrity.



### **Conflicts of Interest**

You should not put yourself in a position where you are involved in an activity for personal gain, to you or your family, which conflicts with the Company's interests. Conflicts of interest can take many forms including, but not limited to:

- Engaging in any activity that competes with Apollo Tyres.
- Taking personal advantage of an opportunity that belongs to Apollo Tyres.
- Engaging in a business relationship on behalf of Apollo Tyres where you or a family member has an interest in the other party, including a directorship or shareholding, unless previously advised to, and agreed by management.
- Acquiring an interest in property or companies.
- Board memberships.
- Significant ownership interests of other companies that do or seek to do business with Apollo Tyres.

All potential conflicts of interest need to be reported promptly in advance to the relevant line manager and approval obtained.

### **Employment of Relatives**

In order to avoid an actual or perceived conflict of interest, it is not appropriate to:

- Supervise someone with whom you have a close personal, romantic or familial relationship
- Place colleagues who have a romantic or family connection in a reporting relationship
- Be involved in selecting or hiring someone with whom you have a close personal, romantic or familial relationship
- Participate in the selection or relationship management of a business partner if the firm employs someone with whom you have a close personal, romantic or familial relationship

All potential conflicts of interest relating to working with relatives need to be reported promptly in advance to the relevant line manager and approval obtained.

### **Innovation and Intellectual Property\***

As a term of your employment with Apollo Tyres, the Company owns any inventions, discoveries, improvements, brands and designs you make during the course of your employment and all related intellectual property rights. You are required to protect and secure Apollo Tyre's registered and unregistered intellectual property as confidential information during and after your employment with the Company. The Company will be entitled to the exclusive use of these rights, as far as the law permits and you will have no right to use them for your own purposes or share them with any third party unless otherwise agreed in writing. The Company will also own copyright and similar rights in work created during your employment and you agree to waive any moral rights as permitted by law, which you may have. It is also a term of your employment that you do everything necessary, during or after your employment, to enable the Company - at its request and expense - to obtain patents, design, copyright, trademark and similar protection in any part of the world and

also not share the said information or related intellectual property rights with any third party.

**\*These conditions may vary in your region especially the Netherlands, Germany or Hungary, where you should refer to your HR Business Partner and your local conditions/contract.**

### **Personal Data**

The Company recognises the importance of respecting your privacy and the need for appropriate safeguards in relation to the collection, transfer, storage and processing of personal data. It expects that all information held about employees will be dealt in a proper and responsible manner as per the applicable laws.

Apollo Tyres is committed to handling personal information in line with data protection laws. Wherever you work in the business, as an Apollo Tyres employee you have an important part to play in enabling us to meet this commitment. As an employee it is your responsibility to ensure that all personal information is handled in compliance with data protection laws. This applies to all information, held on computer or in hard copy files, from which a person could be identifiable and includes sensitive information as well.

As an employee you must be cautious of people trying to obtain information to which they are not entitled. Do not access personal data about people without appropriate authorisation, only use it for legitimate legal or business purposes and only hold the information as long as is necessary to carry out the business or legal task. In case you become aware of any misappropriation of personal data or any incident relating anyone's personal data including yours, you are requested to immediately report the matter to [dataprivacy@apollotyres.com](mailto:dataprivacy@apollotyres.com).

All policies relating to Data Privacy are available on the intranet. It is your responsibility to read and get yourself acquainted with the same.

In case you have any queries or clarification regarding training, policies or anything related to personal data we request you contact us on [dataprivacy@apollotyres.com](mailto:dataprivacy@apollotyres.com) or your respective HR BP.

### **Creating and maintaining accurate records and accounts**

Apollo Tyres is committed to complying, both in letter and spirit, with its reporting and disclosure requirements under applicable laws, regulations or as required by its internal policies. We maintain complete and accurate records so that we can make responsible business decisions and provide truthful and timely information to the investing public and various governments. Our policy to ensure we preserve and archive our documents is available on the Company's Intranet.

Business and financial records are essential to our business operations. We rely on the integrity and accuracy of those records, both for internal decision-making and for the benefit of investors, government agencies, regulators and others to whom we report. Accurate and transparent record keeping and appropriate storage and archive procedures protect our reputation, promotes organizational efficiency and helps us to meet our legal and regulatory obligations.

All of us, not only those working in finance and accounting roles, have a responsibility to ensure the integrity, accuracy and effectiveness of our record keeping and must do so in the following ways:

- Record all assets, liabilities, revenues, expenses and business transactions completely, accurately, in the proper period and in a timely manner.

- Ensure that records and accounts conform to generally accepted accounting principles and our internal controls system.
- Never set up or maintain for any purpose any cash funds, other assets or liabilities that are secret or unrecorded.
- Do not participate in “trade loading” or “channel stuffing.”
- Use thoughtful, appropriate and accurate wording when creating records, avoiding exaggeration, colourful language, guesswork, conclusions outside of your functional expertise and derogatory characterizations about people and their motives.
- Never conceal or destroy documents or records that are subject to investigation or may be used in an official proceeding.
- Maintain and destroy company records in compliance with our records management policy and record retention protocol.
- Ensure at all times the confidentiality of any information and/ or business records received in confidence by an employee, and not disclose or disseminate such confidential information unless duly authorised.

For more information, please refer to the “Policy on preservation and archival of documents” available on Company’s Intranet.

### **Use of Information Technology ('IT') and Cyber Security**

We use company equipment and information communication systems responsibly and we all must be prudent and responsible in our use of the company’s information and communications equipment and systems.

Information Security and Privacy Handbook provides the framework to implement the Trusted Information Security Assessment Exchange (TISAX) based on the Verband der Automobilindustrie’s VDA Information Security Assessment (ISA) framework which complies with ISO/IEC 27001:2013 ('ISMS') This document supplements Apollo Tyres Information Security Management System processes defined to meet additional organizational processes.

The information security objectives based on the strategy of the organization, regulative and contractual obligations are described in ISMS Policy document.

1. Confidentiality, Integrity and Availability of information is maintained.
2. Maintain policies and provide support and advice during implementation.
3. Procedures exist to support the policy, including virus control measures, passwords, and continuity plans.
4. All personnel are trained on information security and are informed that compliance with the policy is mandatory.
5. Risk Assessment - review risk assessment annually or after a significant change in the business.
6. Ensure Information Security is embedded at the start of each project.
7. All breaches of information security and suspected weaknesses are reported via the

Service Desk which will be investigated by the Head of Information Security.

8. Regulatory and legislative requirements are met including local Data Protection, Fund and Fiduciary laws.
9. Business continuity plans to be established, maintained, and tested.
10. Achieve and maintain TISAX certification.

Also, we strictly prohibit the use of Apollo Tyres systems (including email, instant messaging, the Internet, or Intranet) for activities that are unlawful, unethical, or otherwise contrary to this Code or Company policy. Related "Acceptable Usage Policy" is available on Intranet for all users to access.

Categories and Classification Controls of Information Assets are briefly explained in section 5.1 and 5.2 respectively in [Asset Management Policy 3.0](#) in detail.

Information Security Incident Response Policy: This document is intended to be used when an incident has occurred that affects the information security of Apollo Tyres. It is intended to ensure a quick, effective, and orderly response to information security incidents

Also, other IT related global policies are available on Intranet for users to access. You can refer below link:

[Policies - All Documents \(sharepoint.com\)](#)



We set the same standards for ourselves that we expect from others.

## **Fair Competition**

The Company subscribes to upholding the highest standards of fair and ethical business practices and market driven competition. It ensures that it does not restrict the freedom of choice and free competition in any manner while designing, promoting and selling its products.

It seeks to outperform its competitors fairly and honestly, achieving competitive advantage through superior performance and never through unethical or illegal business practices.

The Company competes for business aggressively but always honestly. It believes in free and open competition that is vigorous and principled. It recognizes that laws regulate competition and trade practices vary around the world. However, certain activities, such as price fixing, agreeing with a competitor to allocate customers or territories, and bid rigging, are always prohibited.

It complies with all applicable laws; rules and regulations that govern the way companies compete. These laws are designed to foster free and fair competition. Even the appearance of improper agreements with competitors can harm its reputation and risk legal action. Antitrust/competition laws are complex and vary from country to country. Proven violations carry significant fines and even imprisonment and company discipline up to and including termination of employment.

In relation to its competitors, it:

- Never discuss or reach agreements about any aspect of the following:
  - Pricing
  - Territories
  - Markets
  - Contracts
  - Production
  - Customers
  - Inventory
  - Costs
  - Capacity

Apollo Tyres protects its own secrets and respects the intellectual property rights of others. Employees must not obtain confidential information of other parties by improper means or disclose it without authorization.

- Immediately contact our Legal Department if a competitor attempts to discuss any topic listed above.
- Conduct all relations with competitors, including social activities, as if the government will scrutinize them.
- Do not misrepresent product and price attributes or make false claims about competitors' offerings.

If you are part of the Europe region, please refer to your Competition Law guide on your local intranet. For APMEA and corporate roles, please refer to the Competition Compliance Manual on Company's intranet.

### **Inside Information and Market Abuse**

We never use or improperly disclose material, non-public information about Apollo Tyres or another company for the purpose of buying or selling securities; nor do we ever attempt to manipulate the price of publicly traded securities.

We support fair, open securities markets and strive to preserve Apollo Tyres Company's reputation as a company that can be trusted to deal honestly, everywhere we do business. Insider trading and financial market abuse not only distort financial markets, but they are also illegal. Enforcement is rigorous, and penalties are severe. Many of us have access to information about Apollo Tyres that may not be known to the public. This is known as "inside information". For more information please refer to the "Insider Trading Code" on the intranet.

The Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information is required us to ensure timely and adequate disclosure of unpublished price sensitive information ("UPSI") which would impact the price of the Apollo Tyres share. If you have access to any unpublished data that may impact Company's share price, you should refer to the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information available on the Company's Intranet.

## One Family

We create an inclusive culture that brings our people, partners, and communities together. We are committed to ensure all employees are treated with dignity and respect, all of their efforts are appreciated, and their potential is brought out to the fullest.

We value and take pride in fellow Apolloites, respecting diverse views.

### Valuing Diversity

We value the diversity of the people with whom we work and the unique contributions they make. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. We wish to provide facilities for the wellbeing of our employees including those with special needs. The basis for recruitment, hiring, placement, training, compensation, and advancement in the Company is qualifications, performance, skills, and experience. We actively engage and collaborate with colleagues, partners and communities together, to create a common vision. We celebrate oneness through building trusting relations, inclusive culture and passion towards common goals.

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### Equal Opportunities

We are committed to being an active equal opportunities employer, from recruitment and selection, through learning and development, performance management, and career development, right up to retirement. We treat everyone equally regardless of age, gender, gender reassignment, colour, ethnic or national origin, disability, hours of work, nationality, caste, religion, or belief, marital or civil partner status, disfigurement, political opinions or sexual orientation, or any other factor made unlawful by applicable laws and regulations.

We treat all colleagues with dignity and respect and expect colleagues to treat each other and our customers in the same way. We all have a responsibility not to support unfair behaviour by ignoring what is happening around us. It is the Company's policy to promote an environment free from discrimination, harassment, and victimisation where everyone will receive equal treatment. All decisions relating to employment practices will be objective, free from bias, and based solely on work criteria and individual merit. In every set of circumstances we aim to find the 'best fit' between personal requirements and business needs.

For colleagues who would like to raise a concern, please follow either your local complaints procedure or for more serious concerns, refer to the policy on Reporting of Breaches of the Code of Conduct (Annexure to this code). Your HR Business Partner will be able to provide you details.

We trust and enable our colleagues to take responsible decisions in their sphere of work.

## Human Rights

Apollo is committed to respecting human rights. We are working towards better identification, prevention, and mitigation of adverse human rights impacts resulting from or caused by our business activities.

We believe in the concept of "One Family" and the same is enshrined in our Values. We promote the awareness and realization of human rights across our value chain. We celebrate our oneness through building trusting relations, respect for diversity and passion towards common goals. For an example:

- You must know their colleagues as they would know a friend.
- You must encourage each other to lead a healthy lifestyle and balance work and personal life.
- You must value and take pride in fellow colleagues irrespective of their hierarchy, race, religion and gender.
- You must connect with each other as one team with one dream.

The Company's Human Rights Policy is available on the Company's Intranet.

## Workplace Security

The Company is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.

Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy, safety and dignity.

A separate "Policy to prevent and deal with sexual harassment" has been formulated and is available on Company's intranet. The employees are required to adhere with the same in a strict manner.

## Child and Forced Labour

We seek to conduct our business in a manner that respects the human rights and dignity of people. We wish to play a role in the elimination of human rights abuses such as child labour, human trafficking and forced labour. The Company does not hire child labour, forced labour or any form of involuntary labour, paid or unpaid. It prohibits the hiring of individuals that are under 18 years of age.

## **Compliance with International Labour Organisation (ILO) Standard's**

Across Apollo Tyres, we are committed to ensure that people are treated with dignity and respect.

The Company independently ensures that the following, identified as a part of fundamental rights at work by International Labour Organisation [ILO], are addressed while performing its activities:

- Freedom of association and collective bargaining.
- Elimination of all forms of forced or compulsory labour.
- Effective abolition of child labour.
- Elimination of discrimination regarding employment and occupation.

### **Freedom of Association and Collective Bargaining**

The Company respects its employees' right to freedom of association and participation without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

The Company respects the right of freedom of association, participation, collective bargaining and ensures all individuals impacted by the business have access to a grievance policy.

We encourage each other to work-hard, play-hard and strike a healthy work life balance.

### **Encouraging Work life Balance for employees**

At Apollo Tyres, the requirement of maintaining work life balance of its employees is recognised and promoted. The Company ensures the timely payment of fair living wages to meet basic needs and economic security of the employees.

### **Training and Development**

Training and Development is of paramount importance at Apollo Tyres because it allows Apolloites to expand their knowledge base, acquire new skills, sharpen existing ones, perform better, increase productivity and become better leaders. Continuous efforts are being taken to improve the employee capabilities by offering functional training programmes that are focused on our business imperatives.

The Company ensures continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis. It promotes employees' morale and career development through enlightened human resource interventions.

We actively engage and collaborate with colleagues, partners, and communities together, to create a common vision.



## Reporting of Breaches of the Code of Conduct (confidential reporting)

### 1. What is “Reporting of Breaches of the Code of Conduct”?

In this policy ‘Reporting of Breaches of the Code of Conduct’ means the reporting by employees of suspected misconduct, sexual harassment, illegal acts or failure to act within Apollo Tyres interests.

The aim of this Policy is to encourage employees and others who suspect misconduct / have serious concerns about any aspect of Apollo Tyres’ work to come forward and voice those concerns.

Employees are often the first to realize that there may be something seriously wrong within Apollo Tyres. ‘Reporting of Breaches of the Code of Conduct’ is viewed by Apollo Tyres as a positive act that can make a valuable contribution to our efficiency and long-term success. It is not disloyal to colleagues or Apollo Tyres to speak up. We are committed to achieving the highest possible standards of conduct and the highest possible ethical standards in all of our businesses.

To help achieve these standards we encourage freedom of speech.

If you are considering raising a concern you should read this Policy first. It explains:

- The type of issues that can be raised
- How the person raising a concern will be protected from victimisation and harassment
- How to raise a concern, and
- What Apollo Tyres will do.

If you are unsure whether to use this Policy or want independent advice at any stage, you may contact your HR Business Partner (HRBP) or the Compliance Officer. Either your HRBP or the Compliance Officer can give you confidential advice on how to raise a concern about serious malpractice at work.

### 2. What is the aim of the Policy and when does it apply?

#### 2.1. Aims of the Policy

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within Apollo Tyres without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

It is also intended to encourage and enable you to raise serious concerns **within** Apollo Tyres rather than ignoring a problem.

It is a breach of the Code to fail to report a violation or suspected violation that employees know about or to refuse to cooperate with the investigation of a suspected violation.

This Policy aims to:

- Encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- Provide avenues for you to raise those concerns and receive feedback on any action taken
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- Reassure you that you will be protected from possible reprisals or victimization if you have made any disclosure in good faith.

**Reporting of Breaches of the Code of Conduct (confidential reporting)****2.2. Scope of this Policy**

**This Policy is intended to enable those who become aware of wrongdoing in Apollo Tyres affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.**

The Reporting of Breaches of the Code of Conduct Policy is not intended to replace existing procedures:

- If your concern relates to your own treatment as an employee, you should raise it under the existing grievance procedures
- If a customer has a concern about goods or services provided to him/her, it should be raised as a complaint to the Customer Service teams.

**2.3. Who can raise a concern under this Policy?**

The Policy applies to all:

- Employees of Apollo Tyres
- Employees of contractors working for Apollo Tyres, for example, agency staff, builders and drivers

**2.4. What should be reported?**

Any serious concerns which has occurred within the last three months that about the conduct of officers or members of Apollo Tyres or others acting on behalf of Apollo Tyres that:

- Make you feel uncomfortable in terms of known standards
- Are not in keeping with Apollo Tyres Values and policies
- Fall below established standards of practice or proper behaviour.

These might relate to:

- Conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
- Disclosures related to miscarriages of justice
- Racial, sexual, disability or other harassment or discrimination
- Health and safety of the public and/or other employees
- Damage to the environment
- Unauthorized use of funds or other assets
- Possible fraud and corruption
- Neglect or abuse of customers, or
- Other unethical conduct.

Note: This list is not exhaustive.

**Reporting of Breaches of the Code of Conduct (confidential reporting)****3. Protecting the Person who has a concern****3.1. Your rights**

This policy has been written to protect those making disclosures about certain matters of concern / suspicion of misconduct.

It is unlawful for Apollo Tyres to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure.

Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. Apollo Tyres cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

**3.2. Harassment or Victimisation**

Apollo Tyres is committed to good practice and high standards and to being supportive of you as an employee.

Apollo Tyres recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

Apollo Tyres will not tolerate any harassment or victimisation of a reporter (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and any retaliation will be treated as a serious disciplinary offence that will be dealt with under the disciplinary rules and procedure.

**3.3. Support to you**

Throughout this process:

- You will be given full support from senior management
- Your concerns will be taken seriously, and
- Apollo Tyres will do all it can to help you throughout the investigation

If appropriate, Apollo Tyres will consider temporarily re-deploying you for the period of the investigation.

For those who are not Apollo Tyres employees, Apollo Tyres will endeavour to provide appropriate advice and support wherever possible.

**3.4. Confidentiality**

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

## Reporting of Breaches of the Code of Conduct (confidential reporting)

### 3.5. Anonymous Allegations

This Policy encourages you to put your name and/or your contact details to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously.

### 3.6. Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, Apollo Tyres will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action may be taken.

## 4. Raising a Concern

### 4.1. Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise any concerns with:

- Your Line Manager
- The HR Business Partner (HRBP) for your business area/region

If, exceptionally, the concern is more serious you can put your disclosure in writing, via email to:

- [coc.report@apolloytyres.com](mailto:coc.report@apolloytyres.com)

If the disclosure is about the Vice Chairman & Managing Director of Apollo Tyres your concern should be raised with the Chairman of Apollo Tyres who will decide how the investigation will proceed. This may include external investigation.

### 4.2. The special role of your HRBP

If you are unsure if there has been wrongdoing, you can contact your HRBP to seek their support. HRBPs are there to:

- Be a confidential resource for you to talk to
- Listen to your complaint
- Consider your complaint in an empathetic way
- Obtain any policy clarification you may need
- Explore options with you on finding a way forward which you would be comfortable with
- Give you access to others who may be able to help you
- Recommend if you should directly report the disclosure to the [coc.report@apolloytyres.com](mailto:coc.report@apolloytyres.com) email.

## **Reporting of Breaches of the Code of Conduct (confidential reporting)**

### **4.3 How to raise a concern**

You may raise your informal concern by telephone, in person or in writing to your HRBP. If, exceptionally, the concern is more serious you can put your disclosure in writing, via email to:

- [coc.report@apolloyres.com](mailto:coc.report@apolloyres.com)

The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- The nature of your concern and why you believe it to be true
- The background and history of the concern (giving relevant dates)

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within Apollo Tyres and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with your HRBP first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

If you are a member of a Trade Union, you may invite your trade union, professional association representative or a friend to be support during any meetings or interviews in connection with the concerns you have raised.

### **5. What Apollo Tyres will do**

Apollo Tyres will respond to your concerns as quickly as possible. Do not forget that testing your concerns is not the same as either accepting or rejecting them.

The overriding principle for Apollo Tyres will be the public interest. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so.

In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- Be investigated by management, internal audit, or through the disciplinary process
- Be referred to the external auditor
- Be referred and put through established protection/abuse procedures
- Form the subject of an independent inquiry

Within 2 working days of a concern being raised, the person investigating your concern will write to you:

**Reporting of Breaches of the Code of Conduct (confidential reporting)**

- Acknowledging that the concern has been received
- Indicating how Apollo Tyres proposes to deal with the matter
- Supplying you with information on staff support mechanisms
- Telling you whether further investigations will take place and if not, why not.

The amount of contact between you and the officer considering the issue will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

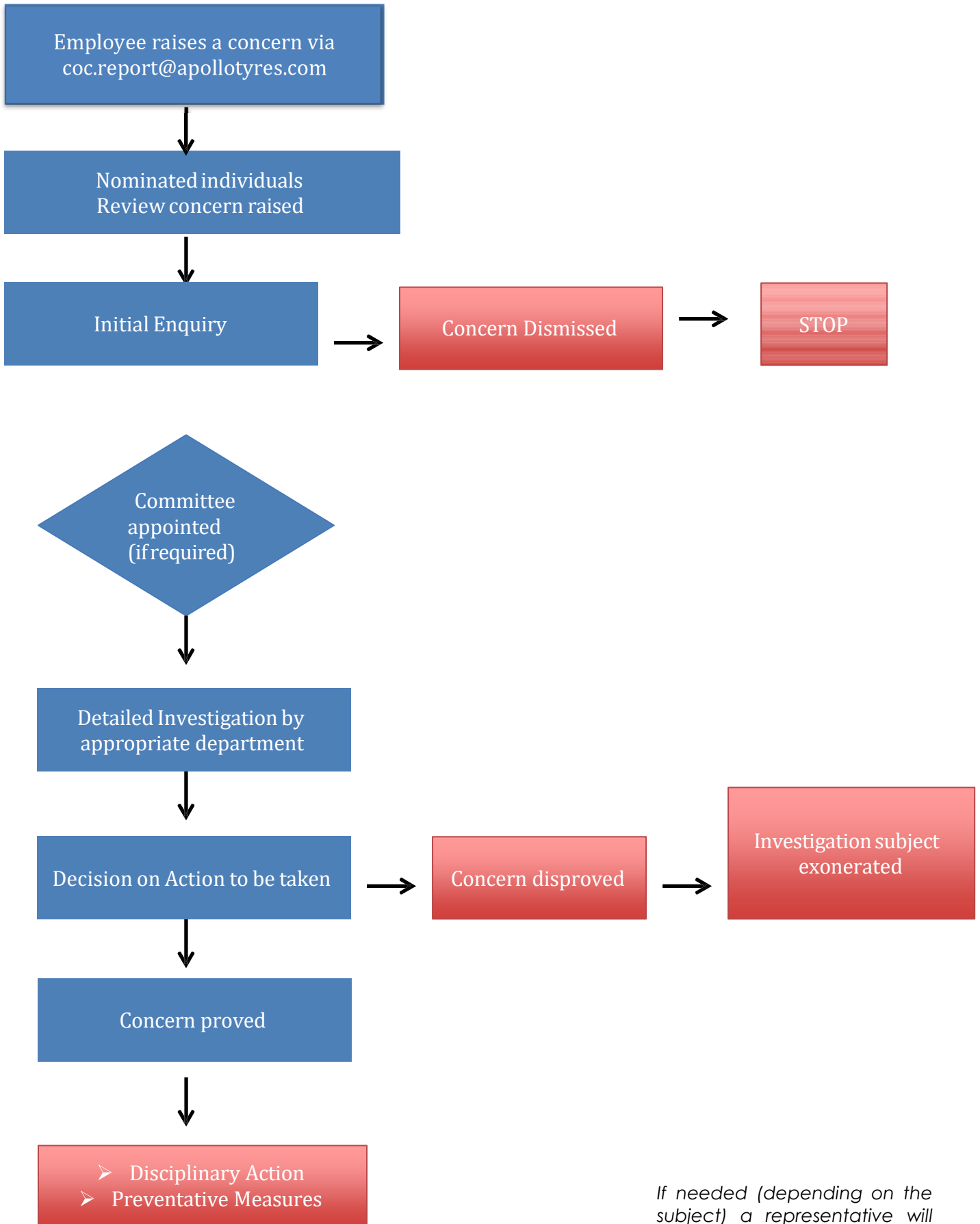
Any meeting can be arranged away from your workplace, if you wish, and a union or professional association representative or somebody else may accompany you in support.

Apollo Tyres will do what it can to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, Apollo Tyres will arrange for you to receive appropriate advice and support.

You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

**Reporting of Breaches of the Code of Conduct (confidential reporting)**

The Formal Reporting Process



*If needed (depending on the subject) a representative will be invited in the Committee.*

## Reporting of Breaches of the Code of Conduct (confidential reporting)

### 6. How the Matter can be taken further

This Policy is intended to provide you with an avenue within Apollo Tyres to raise concerns. Apollo Tyres hopes you will be satisfied with any action taken. If you are not, and you feel it is right to take the matter outside Apollo Tyres, please either contact the relevant body prescribed by your local legislation or the [coc.report@apolloytyres.com](mailto:coc.report@apolloytyres.com) email, where the Nominated Individual will be able to give you advice.

This Policy **does not** prevent you from taking your own legal advice.

### 7. Review of the Policy

The relevant Board's Committee of Apollo Tyres will review this Policy. For entities based in Netherlands, the works council will be consulted for positive advice.

### 8. Corporate Recording and Monitoring

On a quarterly basis, ahead of the relevant meeting of Board or its Committee, the Nominated Individuals will report to the Compliance Officer the register of complaints received on a 'no complainant names' basis to protect their identity. The Compliance Officer may report the findings to the Board or its Committees as may be appropriate. For entities based in Netherlands, the works council will be informed on an annual basis about the register in their area of responsibility.

The corporate register may be made available for inspection by internal and external audit, after removing any confidential details.



## Reporting of Breaches of the Code of Conduct (confidential reporting)

### Questions and Answers

#### 1. What is a “person who has a concern”?

You're a “person who has a concern” if you are a worker and you report certain types of wrongdoing. This will usually be something you've seen at work - though not always.

The wrongdoing you disclose must be in the public interest.

As a “person who has a concern” you're protected by law - you shouldn't be [treated unfairly or lose your job](#) because you have a concern about a potential breach of the Code of Conduct.

You can raise your concern at any time about an incident that happened in the past (within the last three months), is happening now, or you believe will happen in the near future.

#### 2. Who is protected by this policy and the law

You're protected if the following applies:

- Employees of Apollo Tyres
- Employees of contractors working for Apollo Tyres, for example, agency staff, builders and drivers
- Employees of suppliers
- Those providing services under a contract or other agreement with Apollo Tyres in their own premises, and
- Voluntary workers working with Apollo Tyres

#### 3. Complaints that count as a person who has a concern

You're protected if you report any of the following:

- A criminal offence, e.g. fraud
- Someone's health and safety is in danger
- Risk or actual damage to the environment
- A miscarriage of justice
- The company is breaking the law, e.g. doesn't have the right insurance
- You believe someone is covering up wrongdoing
- Sexual harassment
- Discrimination

#### 4. Complaints that don't count as concern

Personal grievances (e.g. bullying) aren't covered by the same laws that protect those who are reporting a breach in the Code of Conduct. Report these under our grievance policy.

#### 5. Who to tell and what to expect

You can tell us – this is our reporting of breaches of the code of conduct policy that tells you what to expect if you report your concern to us. There are other options if you don't want to report your concern to us directly, you can get legal advice from a lawyer, or tell a prescribed person or body e.g. if you are a member of a Company recognised trade union, you may be able to advise them.

If you tell a prescribed person or body, it must be one that deals with the issue you're raising.

#### 6. Making your claim anonymously or confidentially

You can tell us or email the [coc.report@apolloyres.com](mailto:coc.report@apolloyres.com) anonymously but we may not be

**Reporting of Breaches of the Code of Conduct (confidential reporting)**

able to take the claim further if you haven't provided all the information they need. Alternatively, you can give your name but request confidentiality.

If you report your concern to the media, in most cases you'll lose your legal rights.

**7. What we will do**

As your employer, we will listen to your concern and decide if any action is needed. You may be asked for further information.

- You must say straight away if you don't want anyone else to know it was you who raised the concern.
- You won't have a say in how your concern is dealt with.
- We can keep you informed about the action we've taken, but we can't give you as much detail if they have to keep the confidence of other people.

**VERSION**

<b>Version</b>	<b>Approved By</b>	<b>Approval Date</b>
1	Board of Directors	February 1, 2017
2	Board of Directors	May 12, 2022