

PUBLIC AND REGULATORY POLICY

1. PREAMBLE

- ✓ This policy is based on the principle that the employees of Apollo Tyres Ltd (“The Company” or “ATL”) while engaging with the public and the regulators during the course of its operations must act within the bounds of the authority conferred upon them and in accordance with the policies of the Company.
- ✓ The employees must comply with all the applicable legal and regulatory requirements. This policy sets out the fundamental standards to be followed by the employees during the course of their interaction with the public/regulators.

2. APPLICABILITY

The policy is applicable to all offices of the Company.

3. RESPONSIBLE ADVOCACY

ATL believes that it is necessary to represent to and engage with authorities on matters concerning the various sectors in which the Company operates. The engagement with the relevant authorities is guided by the values of commitment, integrity, transparency and the need to balance interests of diverse stakeholders.

The employees while dealing on behalf of the Company shall:

- ✓ Ensure he/ she has been duly authorized/ permitted to engage in advocacy of behalf of the Company.
- ✓ Ensure that its advocacy position is consistent with its values and philosophy;
- ✓ Work with industry organizations that are engaged in policy advocacy;
- ✓ Ensure that policy advocacy is conducted ethically;
- ✓ Refer to applicable policies of the Company as a guide for its actions in influencing public and regulatory policy.

4. POLICY SPECIFICATIONS

4.1 Dealing with Stakeholders

The Company is committed to provide high and consistent levels of service to its stakeholders viz. customers, shareholders, investors, suppliers, vendors, dealers, consultants, agents and various business associates.

- ✓ Employees while engaging with its stakeholders must be responsive and polite in all the dealings and respect their rights and dignity.
- ✓ Be aware of any potential conflicts of interest and discuss any concerns with the manager or reporting supervisor.
- ✓ External presentations can be an excellent way to share our expertise with others, but make sure you have the required approvals before accepting any invitation and obtain the necessary approvals on content.
- ✓ Not provide misleading or false assurances or information at any time.
- ✓ Always act in the interest of the Company in all transactions with the stakeholders.
- ✓ Not accept any favour in cash, kind or any facility.
- ✓ Deal with them strictly on a professional basis.

4.2 Dealing with various Industry Associations

- ✓ The Company can be a member of the various trade and business associations and employees can be nominated by the management as representatives
- ✓ The engagement with the various industry associations is a method for advocating the advancement of the industry and public good.
- ✓ The Company's engagement with the relevant authorities must be guided by the values of commitment, integrity, transparency and the need to balance interests of diverse stakeholders.
- ✓ The various Industry associations can be Automotive Tyre Manufacturers Association (ATMA), Confederation of Indian Industry (CII), Federation of Indian Chambers of Commerce and Industry (FICCI), Associated Chambers of Commerce and Industry of India and various other forums

4.3 Dealing with Regulators

The Company's business is in a highly regulated sector and employees will have to associate with Government Authorities/Regulatory bodies (Taxation, Customs, Central Excise, Stock Exchanges, Securities and Exchange Board of India, Reserve Bank of India etc.) and various other statutory bodies during the course

of its operations and such employees are required to build relationship of trust based on transparency and fairness at all levels.

- ✓ While dealing with the Government Authorities/ Regulators, you must ensure that the highest standards of business conduct are followed.
- ✓ Contact or engage with the relevant Government Authority/ Regulator only if authorized to do so on behalf of the Company.
- ✓ 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.
- ✓ Do not attempt to exert undue influence to obtain a favourable decision
- ✓ Do not destroy, alter, conceal any records or data in physical/ electronic form.
- ✓ Do not provide false or misleading information or create false data or records

5. AFFIRMATION TO THE POLICY

This policy is communicated to all employees in an appropriate and meaningful manner. All employees must understand and adhere to the Company's Public and Regulatory Policy and at all times abide by the standards, requirements and procedures laid down herein. They must:-

- ✓ Commit to individual conduct in accordance with this Policy
- ✓ Observe both, the spirit and the letter of the law in their dealings on the Company's behalf.
- ✓ Recognize the Company's responsibility to its shareholders, customers, employees, those with whom Company does business, and to society
- ✓ Assess priorities in the context of discharging these responsibilities appropriately on the Company's behalf
- ✓ Conduct themselves as responsible members of society, giving due regard to health, safety, and environmental concerns, and human rights, in the operation of the Company's business.

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

6. VIOLATION OF THE POLICY

Violations of law, or other Company policies or procedures by Company employees can lead to disciplinary action up to and including termination. Where the Company has suffered a loss, it may pursue legal actions against the individuals or entities responsible.

7. EXCEPTIONS

Any exceptions to the norms laid down in this Policy may be at the discretion of the Chairman/ Managing Director or any appropriate authority delegated by them.

8. AMENDMENTS

This Policy may be updated/ amended by the Company from time to time.

9. ACCESSIBILITY

This policy may be viewed online at www.apollotyres.com