

## STAR CEMENT LIMITED

### Anti-Corruption and Anti-Bribery Policy

#### Purpose of this Policy

The Anti-Bribery Policy of Star Cement Limited ensures adherence to the highest ethical standards, in compliance with the applicable anti-bribery laws. This Policy will enable employees and value chain partners to identify and discretely report breaches of the policy, if any.

Through this Policy the Company echoes its commitment on “zero tolerance towards bribery and corruption”.

#### What is Bribery?

‘Bribery’ is the act of offering, promising, or providing gainful advantage to an individual, commercial or a regulatory body. The proceeds due to the enactment of such an event could be in the nature of cash, gifts, entertainment, loans, inflated commissions, unauthorized rebates or other advantages to which the person is not normally entitled to.

Inducement is unlawful, even if it is not accepted. Giving, offering, requesting and receiving such an advantage can be construed as a bribe, even if it is made indirectly through a third party.

Bribery includes the offer, promise, giving, demand or acceptance of an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust. Bribes often involve payments (or promises of payments) but may also include anything of value - providing inappropriate gifts, hospitality and entertainment, inside information, or other favours; underwriting travel expenses; abuse of function; or other significant favours. Bribery includes advantages provided directly, as well as indirectly through an intermediary. Bribery also includes any attempt to do any of the foregoing.

#### Key Prohibitions

The key prohibitions as part of this Policy are:

1. Offering, promising, or giving a financial or other advantages to another person to induce a person or organization to perform a relevant function or to reward a person or organization for the improper performance of such a function or activity;
2. Soliciting, agreeing to receive or accepting a financial or other advantage to perform a relevant function or activity;
3. Offering or accepting gifts to or from public officials (a public sector, state or central government employee)

#### Guidance on specific areas:

##### a. Gifts and Entertainment

At times, it might be customary, to give or exchange unsolicited gifts during the festive seasons or during certain corporate events. In addition, to build business relations, it is a custom to accept and/or provide entertainment to a third party. The Company

prohibits receipt or giving of any unreasonable gifts with an intent to derive any benefit in return.

**b. Charitable contributions**

Charitable contributions should not be used as a scheme for bribery. Such contributions must always meet high ethical standards and avoid even the perception of impropriety.

Company contributions to charitable organizations will be approved and authorized in accordance with the Company's policies and systems of authority.

**c. Facilitation payments**

Facilitation payments (made to expedite the performance of a routine action by any person or organization) are prohibited.

**d. Government officials**

Payments to Government officials not mandated by law are prohibited.

**e. Expense reimbursements**

All expenses must be recorded along with relevant supporting documentation such as invoices or receipts. Any inaccurate or misleading claims are strictly in breach of this Policy.

**f. Third Parties**

Any payment which is improper in nature (including bribes) must not be routed through a third party.

### Reporting Concerns

The identification, reporting and prevention of bribery is the responsibility of all employees and value chain members. Hence, it is important for each one of us to be aware as to how to raise the concerns.

Through the Whistle Blower/ Vigil Mechanism employees and value chain partners are empowered to notify the management regarding suspected misconduct, frauds, bribery, corruption, or any other unethical misbehaviour without the fear of any disciplinary action or unfair treatment to the Chairman, Audit Committee. The Company prohibits retribution against any complainant and if this were to arise, appropriate penal action will be taken against the individuals involved in such retribution. All reports raised are taken seriously and, where appropriate, will be investigated fully.

If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, then please contact the Chairman, Audit Committee.