

Anti-Bribery and Anti-Corruption Policy



Preamble:

ATMASTCO is committed to conducting its business in accordance with the highest ethical standards, within the framework of prescribed rules, applicable laws and regulations. Integrity and trust – recognized as the core values of ATMASTCO – form the foundation of all activities undertaken to achieve its vision.

The purpose of this policy is to promote integrity, ethics, transparency in the governance of the company reinforcing the trust and confidence placed in us by shareholders and other stakeholders. ATMASTCO is dedicated to acting professionally, fairly, and with integrity in all business dealings and relationships across its operations, while implementing effective systems to prevent bribery.

Objective:

To ensure that neither the company nor any of its employees, directors or authorised representatives indulge in bribery in any of their actions taken, for and on behalf of the company, in the course of economic, financial or commercial activities of any kind.

Scope:

This Policy shall be applicable to the company and its

- (i) Board of Directors,
- (ii) Employees (full time or part-time or employed through any third party contract),
- (iii) Agents, Associates, Consultants, Advisors, Representatives and Intermediaries,
and
- (iv) Contractors, Sub-contractors and Suppliers of goods and/or services.

Definitions:

“Bribery” includes giving or receiving bribe and third party gratification.

The act of giving bribe is, when committed intentionally in the course of economic, financial or commercial activities and when it is established that there is a promise, offering or giving, directly or indirectly, of an undue advantage to any person who directs or works, in any capacity, for a commercial entity, for the person himself/herself or for another person, in order that he / she in breach of his/her duties, act or refrain from acting.

“Corruption” includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral or incompatible with ethical standards.

“Gratification” means doing/receiving a favor but not limited to pecuniary gratification.

“Business Partner” or **“Third Party(ies)”** means any individual who, or organization which, transacts with or enter into any arrangement with Atmastco or its Group/associate companies, including customers, suppliers, service contractors, intermediaries, business contacts, consultants, representatives, sub-contractors, advisers, joint venture partners, licensees,

“Public Servant” As per Section 2(c) Prevention of Corruption Act, 1988.

Policy Statement:

Atmastco is strongly committed towards complying with all applicable laws, regulations and rules thereunder from time to time, covering all branch offices and plant locations. The Anti-Bribery and Anti-Corruption policy (“The Policy”) defines the Company’s responsibility and duty to Comply with Anti-Bribery and Anti-Corruption policy Laws (as applicable from time to time). The Company maintains a zero-tolerance approach towards non-compliance with the Policy.

The Company is committed to doing business ethically and expect its employees to follow and practice business standard at all times. Any Violation of this policy may result in disciplinary action, up to and including dismissal, in appropriate circumstances. It is therefore extremely important that employees must familiarise themselves with the policies and procedures and strictly adhere to it.

The Company’s policy strictly prohibits give/ receive / facilitate bribes or other illegal gratification /gifts to another person or organization in order to unduly favor any person/party or to gain any unfair advantage or obtain /retain business. This includes compliance with prevailing anti-corruption laws of the land, prohibitions of improper payments, gifts, lavish hospitality or any kind of illegal gratification, illegal payments directly or through third parties and any kind of direct or indirect bribe.

To prevent bribery and corruption in all its activities and business dealings, Atmastco shall uphold the applicable laws in the country of operation. The elements of the Policy includes:

- All expenses should be incurred or received in a lawful manner and should not provide the impression of same being used for influencing any business decision.
- Proper and accurate record keeping along with the supporting documentation which indicate the reason for the expenditure, the period, the evidence, etc. needs to be maintained for all expenses incurred.

Responsible for the Policy

The **Designated Persons*** shall have the overall responsibility for ensuring that all the provisions of this Policy are complied by their Business Unit or team member or Function.

The Audit Committee shall have oversight over the concerns raised in this regard through the Whistle Blower Mechanism.

Process Owner (assisting the Committee): Head of Human Resources Department.

**Designated Persons: including Board Member, Key Managerial Person and All Functional Head.*

Charitable contributions and Sponsorship:

Charitable contributions can only be provided to needy people. Also, The Company may associate with that Organization which involve in charitable work in an honest manner. All the charitable activities as part of Corporate Social Responsibility (CSR) activities, shall be ethical and transparent and properly recorded in company books and records., Atmastco may provide sponsorship to events, for example, sporting or cultural events, that are legal, ethical, permissible under local laws and practices. Documented with a receipt or have a letter of acknowledgement from the charity ensure that the donations receive the proper tax treatment and be compliant with local law, or local or business unit's internal policies and procedures.

Gifts and Hospitality and Donations:

Building and maintaining commercial relationships may, at times, involve giving or receiving corporate hospitality. While such gestures can be appropriate, they can also pose risks if they create actual or perceived conflicts of interest, or if they appear to influence business decisions in any way that are inconsistent with the Company's Anti-Corruption and Anti-Bribery Policy.

Employees are strictly prohibited from accepting any donations, discounts, favors, gifts, or services from existing or potential clients, competitors, suppliers, service providers and any other stakeholders.

Employees shall never, directly or indirectly offer, pay, or authorize payment of money, offer anything of value to any government official, individual, or entity with an intent to influence the decision-making of the recipient, secure favorable treatment or any improper business advantage for the company, provide gratification in exchange for decisions or actions that benefit the Company. Any such act constitutes a breach of this policy and may expose the employee and the company to legal and disciplinary consequences.

Customary, symbolic gifts given or received during festivals—such as sweets, dry fruits, calendars, and similar low-value items—may be allowed under the following conditions:

The total value does not exceed Rs. 5000.00 in an entire calendar year. The gift is nominal and purely customary. The gift does not impair the employee's objectivity. Employees must promptly report any such gifts in accordance with the Company's internal reporting procedures.

Responsibility of Individuals and Reporting Misconduct/non-conformance and protection:

Every individual covered by this policy must read, understand, and follow it at all times. Everyone working for the company is responsible for helping prevent, detect, and report any form of corruption or misconduct. Employees should not ignore or hide anything suspicious; instead, they must immediately inform their reporting manager or a suitable HR team member if they believe or suspect that a violation has occurred or may occur. Employees and workers are encouraged to raise concerns as early as possible, even if they are unsure whether an action counts as bribery or corruption. HR, supervisors, or anyone receiving such complaints must forward the details to Vigilance Cell through the official email at grievance@atmastco.com. Anyone who breaches this policy may face disciplinary action, including possible dismissal. The company promotes openness and assures that concerns raised in good faith will always be supported, even if later proven incorrect. No employee or worker will face unfair treatment for refusing to engage in bribery or for

reporting a concern. . If anyone feels they have been treated unfairly for reporting a concern, they should immediately inform the Audit Committee through email at stakeholders@atmastco.com

Training, Communication and Implementation:

The policy will be explained to all new employees during induction and also shared with all current employees. Any employee with questions about the policy should contact their reporting departmental head.

The Human Resources Department is responsible for ensuring that all employees comply with this policy. At both office and site levels, the respective heads must implement and uphold the policy. The company expects everyone to follow these guidelines consistently and responsibly.

Monitoring & Review:

The designated person will regularly monitor and review how effectively this policy is being implemented, ensuring it remains suitable and efficient. Any improvements identified during the review will be promptly incorporated. Internal control systems and procedures will also undergo regular audits to confirm their strength in preventing bribery and corruption. All employees play an important role in the success of this policy and must use it to report any suspected misconduct. Employees are also encouraged to provide feedback and suggest ways to further improve the policy.

Sd/-
G. Chandrasekhar
Group Chief Executive Officer

Date:11.02.2026

Details of Documents

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