

ANTI BRIBERY AND ANTI CORRUPTION POLICY

The Supreme Industries Limited

612, Raheja Chambers, Nariman Point, Mumbai 400 021.

Tele: 022-2285 1656 Fax: 022-2285 1657

Website: <http://www.supreme.co.in>

Email: investor@supreme.co.in

CIN: L35920MH1942PLC003554

1. SCOPE OF THE POLICY

This Anti-Bribery and Anti-Corruption Policy (the “Policy”) applies to all its employees, Associate, Subsidiary Company, Distributors, Channel Partners, all other Stakeholders or any other person who may be acting on behalf of the Supreme.

2. POLICY FRAMEWORK

I. Employees and other representatives of Supreme are strictly prohibited from:

- All forms of Bribery and corruption practice and offering, promising, giving or authorising, directly or indirectly, any kick back to or for the benefit of any person (whether in the public or private sector) in order to obtain or keep any improper business or other advantage for Supreme, for themselves, or for their family, friends, associates or acquaintances, or otherwise using improper means to influence the actions of others;
- soliciting, accepting or receiving any bribe or kick back from any person (whether in the public or private sector); or
- Acting as an intermediary for a third party in the solicitation, acceptance, payment or offer of a bribe or kick back.
- Prohibits the making or accepting of Facilitation Payments of any kind for any favours to facilitate or expedite official business or work.

II. Gifts, hospitality and entertainment:

- All employees (including their immediate family members) shall not accept or give a gift or favour of any nature from any supplier, vendor, dealer, contractor, customer, competitor or any business associate.
- No gifts including cash gifts, hospitality or entertainment may be offered or provided in exchange for any favour (or promise of any favour) for or benefit to Supreme under any circumstances to any Government Official or any private person.
- This prohibition does not apply to routine two way exchange of normal business courtesies, which might reasonably be expected to be exchanged in the ordinary course of business. These courtesies include business lunch/dinner and exchange of company diaries and calendars, pens with company logo and the like that are not lavish in any way.
- If a gift is inadvertently received it should be promptly returned with a polite note explaining that it is contrary to the Company policy. Any favour which is inadvertently received or extended is to be brought to the notice of the CFO immediately. In case of any favour being received or extended in the context of an emergency (e.g. medical emergency), the event of such a favour being received or extended is to be brought to the notice of the reporting manager by the employee.

III. Charitable Donations

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- Supreme may make charitable donations that are legal and ethical under local laws and practices. It ensures that the charity or a support is for a legitimate cause, and that donations are not being used as a channel for Bribery.
- Any Stakeholder may also, in their personal capacity, make donations that are legal and ethical under local laws and practices. However, it must be ensured that charitable contributions are not used as a scheme to conceal Bribery

IV. Political Contributions

Supreme does not make contributions to any political party or politicians. Stakeholders must not use Supremes' name or trademark for political activities of any kind or provide money or other forms of support to political parties on behalf of Supreme.

3. RESTRICTIVE PRACTICES

Illustrative list of acts / practices that are restricted / prohibited under this Policy shall include but not be limited to:

- Dishonest misappropriation of property / money, criminal breach of trust and cheating, as defined under Indian Penal Code 1860 ("IPC");
- Receiving or giving bribe;
- Acceptance / giving of gifts over and above the extent and the manner as allowed in this Policy;
- Gifts on behalf of Supreme, its employees and other stakeholders in the form of cash or kind, in any currency;
- Charity or sponsorship in order to obtain commercial advantages
- Participation / contribution in / to political activities
- Payment of any costs for Government Officials and their relatives (or in their interests);
- Any other unethical act or omission;

4. RECORD KEEPING AND INTERNAL CONTROL

- Supreme shall keep books, records and accounts in reasonable detail that accurately and fairly reflect all transactions and disposition of Supreme assets.
- Supreme shall maintain internal controls to prevent and detect potential violations of this Policy or of applicable laws. All Persons must completely and accurately document the amount of all transactions, including payments made on behalf of or expenses incurred by Supreme.
- Records and documents generated in connection with the principles set forth in this policy, including, but not limited to, any diligence files and contracting documents, must be maintained and stored for the period specified in the Data retention policy
- Violation of this Policy, may result in legal action / disciplinary action.

5. REPORTING CONCERNS

- Employees, associates are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported immediately with concerned Business Head or Regional Business Head or Functional Head or Head-Human Resources.

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- Supreme aims to encourage genuine reporting of non-compliance and will support anyone who raises concerns in good faith under this Policy.
- Supreme will ensure that no one will suffer any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Dated: 29th April, 2022

M.P.Taparia
Managing Director

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