



ULTRATECH ANTI-CORRUPTION AND BRIBERY POLICY

Company overview

UltraTech Cement Limited (UTCL), a company of Aditya Birla Group (ABG), is the largest manufacturer of grey cement, ready mix concrete and white cement in India. UltraTech is the world's third largest cement manufacturer (excluding China). It is also India's largest exporter of cement and clinker. Currently, UltraTech along with its subsidiaries (collectively referred to as 'UltraTech') has manufacturing facilities in India, UAE, Bahrain and Sri Lanka.

UltraTech strives to be a world-class building solutions provider, a good employer and a responsible corporate citizen. The company is committed to conducting business in a transparent and fair manner while creating a positive impact on the society.

Anti-corruption and bribery policy

UltraTech's Anti-Corruption and Bribery Policy outlines the Company's zero-tolerance approach towards bribery and corruption. The objective of our anti-corruption and bribery policy is to put appropriate anti-corruption and bribery guidelines in place across all our operations globally and thus ensure zero violation of relevant laws and regulations.

Policy Requirements

Bribes, Kickbacks, and Other Payments

UltraTech's anti-bribery laws cover each of its employees or associates working on behalf of the company. The company's business decisions must not be influenced by corrupt practices. Corruption may refer to any act of payments or exchange of goods of any value and includes activities such as bribery and exchange of kickbacks.

UltraTech strictly prohibits any act of offer, promise, grant, authorization, demand, or acceptance of any promise, bribe, kickback, illegal gratuity, illegal payment, or other illegal goods and services of any value directly or indirectly, to or from any person, organization, or government representative.

Our anti-bribery and corruption policy extends to all third parties, working for the Company. The Company also does not hire third parties to conduct any act of corruption or bribery on its behalf. Third parties acting on behalf of UltraTech are prohibited from offering or accepting any bribe on the Company's behalf. Third parties include but are not limited to consultants, subcontractors, franchisees, sales agents, resellers, customs brokers, accounting or law firms, etc.

Political Contributions

UltraTech Cement or its subsidiaries do not directly or indirectly contribute, make payments or provide property or services, to any candidates running for public office or to political parties except pursuant to an approved policy in compliance with applicable laws. Any UltraTech employee who wishes to make a political contribution in his or her personal capacity, must ensure that he or she does not imply it to be a contribution made on behalf of the Company. Company contributions to charitable organizations will be approved and authorized in accordance with the Company's policies and systems of authority.

Gifts and Entertainment

Prohibited from providing gift or entertainment to customers, prospects, government officials or their family members when such expenses are not incurred while conducting company business and / or do not satisfy the guidelines enumerated in this policy and other related policies.

Kailash Jhanwar
Managing Director

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