

ANTI-CORRUPTION & ANTI-BRIBERY POLICY

Century Enka Ltd. is a Global Conglomerate, a Purpose led and Values driven organisation of Aditya Birla Group. Integrity, Commitment, Passion, Seamlessness and Speed are the Group Values and the Group's Purpose is to "Enrich lives, by building dynamic and responsible businesses and institutions, that inspire trust." Our Group Purpose and values form the foundation for all actions and decisions within our business.

Century Enka Ltd. recognizes the need for effective implementation of ABG Code of Conduct. While these principles underpin all our activities, there is a need to ensure it is practiced in letter and spirit. This Policy outlines the company's zero-tolerance approach towards **bribery and corruption**. The objective of the policy is to place appropriate guidelines in place across all our operations and thus ensure zero violation of relevant laws and regulation. The business shall integrate sound ethical practices across the business processes and governance systems.

Applicability: This Policy shall apply to both Bharuch and Pune business and shall be adopted by all offices owned, controlled, and managed by Century Enka Ltd.

Oversight: Managing Director signing this Policy is accountable for the Policy and the Unit Heads are responsible for implementing the policy at their respective sites. Century Enka Ltd. is committed to sustainable development, reflecting its dedication to ethical and responsible business practices.

Bribes, Kickbacks, and Other Payments

Century Enka Ltd. anti-bribery policy cover each of its employees or associates working on behalf of the company. The company's businesses must not be influenced by corrupt practices. Corruption refers to any act of payments or the exchange of goods of any of value and includes activities such as bribery and exchange of kickbacks. We strictly prohibit any act of offer, promise, grant, authorisation, 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, organisation, or government representative. Our anti-bribery and corruption policy extend to all third parties, working for the Company. The Company does not hire third parties to conduct any act of corruption or bribery on its behalf. Third parties acting on behalf of Century Enka Ltd. are prohibited from offering or accepting any inappropriate consideration 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

Century Enka Ltd. 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 Century Enka Ltd. 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 organisations will be approved and authorised in accordance with the Company's policies and systems of authority.

Gifts and Entertainment

All employees and associates are 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 ABG code of conduct.

To communicate this Policy within the Organisation via appropriate communication framework to engage with internal and external stakeholders to broaden our understanding of ethical business practices.

This policy will be reviewed periodically for its suitability and updated as necessary.

Suresh Sodani

Managing Director

Date: 12/05/2025