

**BALKRISHNA INDUSTRIES  
LIMITED**

**Ethics, Transparency and  
Accountability Policy**

<b>Policy Title</b>	<b>Ethics, Transparency and Accountability Policy</b>
<b>Issue Number</b>	1
<b>Issue Date</b>	18 <sup>th</sup> May, 2016
<b>Approved by</b>	Board of Directors
<b>Revision Number</b>	2
<b>1<sup>st</sup> Revision Date</b>	27 <sup>th</sup> May, 2023
<b>2<sup>nd</sup> Revision Date</b>	22 <sup>nd</sup> March, 2025

### **Policy brief and Purpose:**

Balkrishna Industries Limited (hereinafter referred to as "BKT" or "the Company") has adopted this Policy which represents our commitment to doing the right thing, all the time. BKT believe that a Company without ethics is like a body without a soul. The core value of BKT's ethical policy and practices are trustworthiness, respect, responsibility, fairness and caring. This Policy, which is based on the values and behavior of the organization, gives us the guidance and support we need to conduct our business ethically and comply with applicable laws.

### **Scope and Coverage:**

This Ethics, Transparency and Accountability Policy shall be applicable to and must be adhered by all stakeholders of BKT.

### **Our Policy Outlines:**

- Conducting our business in an ethical, transparent, respectful, honest, and responsible manner.
- Working in line with all applicable Government laws.
- Mechanisms to be followed for disclosing any unethical behavior in the workplace.

### **We Aim to:**

- Avoid participation, directly or indirectly in any activity whatsoever which promotes or falls into the category of corruption, abusive or anti – competition conduct. Employees will be subjected to strict disciplinary action, if they are found to be involved in any corrupt activity within or outside the Company.
- Be transparent and fair in dealing with all stakeholders and ensuring adherence to all the applicable laws and regulations.
- Maintain high standards of transparency in operations and will condemn bribery in all forms.
- Develop a culture where it is safe for all employees to raise concerns about

any poor or unacceptable practice and any event of misconduct.

- Constantly improve our Vigil Mechanism and Whistle-blower Policy which sets out *inter alia* the procedure to be followed while making a disclosure on the subject matter contained therein.
- Protect shareholder value, take care of our assets & resources, and be honest and transparent about our operations and performance.

#### **Implementation:**

- The Policy shall be appropriately communicated within the Company across all level and shall be displayed on Company website
- Any of the Whole-time Directors, through the Functional Heads of the Departments / Unit heads of the Company shall be responsible for ensuring that the Policy is implemented throughout the Company.
- Any grievances/ complaints with respect to violation of the Policy shall be reported to the Company Secretary
- Company Secretary shall report non-compliance of this Policy to the Board of Directors. The Board of Directors shall take appropriate action against the wrongdoer, which may include without limitation warning, imposition of fine, withholding of increment, bonus, promotion, suspension from official duties, termination of services, or any such action as is deemed to be fit in the circumstances.

#### **Modification / Amendment in the Policy:**

Any or all provisions of this Policy would be subject to revision/ amendment in accordance with the guidelines on the subject as may be issued by the Central Government or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities from time to time.