Steel Strips Wheels Limited

Anti-Competitive Behaviour Policy

Document Number: SSWL/P&A/30

Classification: Internal

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Document Control

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Approved By	General Manager-P&A

Revision History

Revision	Requested By	Revision Date	Sections modified/ Summary of Changes	Approved By

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1. Purpose & Commitment

SSWL demonstrates zero tolerance toward anti-competitive conduct and unfair trade practices. The Company is committed to fair, ethical and transparent competition and full compliance with applicable Competition/Anti-Trust Laws.

This policy protects SSWL and its employees from legal, financial and reputational risks and promotes markets benefiting customers through innovation and competitive pricing.

2. Scope & Applicability

This policy applies to all employees, Board of Directors, senior management, contractors, consultants, trainees, distributors, supply chain partners and third parties acting on behalf of SSWL.

It applies in all interactions with competitors, customers, suppliers, trade associations, industry bodies and government authorities.

3. Definitions

Item	Requirement / Description
Competition/Anti-Trust Laws	Laws that promote fair competition and prohibit anti-competitive agreements and abuse of dominance.
Competitor	Any company that offers or may offer similar products/services in the markets where SSWL operates.
Cartel	Agreement or understanding among competitors to fix prices, rig bids, allocate markets/customers, or limit production.
Sensitive Information	Non-public information such as pricing, discounts, costs, production plans, customer lists, bids, or strategic plans.

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4. Policy Requirements

4.1 Prohibited Conduct

SSWL representatives must never engage in:

- Price fixing (prices, discounts, margins, credit terms, surcharges)
- Bid rigging or coordinated tender responses
- Market or customer allocation
- Output or production limitation agreements
- Exchange of sensitive commercial information
- Improper resale price maintenance (where prohibited)
- Anti-competitive exclusivity arrangements

4.2 Trade association and industry meetings

Engagement with competitors is allowed only for legitimate purposes such as joint ventures or industry forums.

Pricing and strategic decisions must always be independent.

Improper discussions during meetings must be objected to, recorded, and reported to Legal/Compliance immediately.

4.3 Dealings with Suppliers, Customers & Distributors

Employees must not impose unlawful resale price controls, restrict sales unfairly, or create market barriers.

All agreements must follow approved documentation procedures and legal review where required.

SSWL representative shall not, under any circumstances, engage in Price Fixing with any competitor(s) or supplier(s). We will establish prices and other terms independently, without agreeing with any competitor.

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5. Roles & Responsibilities

Item	Requirement / Description
All Employees/Representatives	Understand and comply with this policy; seek guidance when unsure; report concerns.
Sales/Marketing/Procurement Leaders	Ensure teams follow compliant practices and maintain documentation.
Legal/Compliance	Provide advice, review high-risk arrangements, deliver training, and manage investigations.
Internal Audit	Test controls and review high-risk transactions and communications where appropriate.

6. Approvals & High-Risk Activities

Legal/Compliance review is mandatory for collaborations with competitors, joint bids, information-sharing arrangements, exclusive agreements and pricing-related initiatives. Meeting records must include agenda, attendees and minutes.

7. Dawn Raid / Regulatory Inquiry

In case of investigation:

- Remain cooperative
- Contact Legal immediately
- Do not destroy or alter documents
- Provide only factual information

8. Reporting & Investigation

Suspected violations must be reported via Ethics Committee channels or directly to Legal/Compliance.

SSWL ensures prompt investigation, confidentiality and non-retaliation.

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9. Training & Awareness

Mandatory annual training for Sales, Marketing, Procurement and senior leadership.

Induction training for relevant new joiners regarding competition law and related matters outlined in this policy.

10. Records & Monitoring

Key records must be retained for minimum 8 years.

Internal Audit may review high-risk transactions and communications.

11. Violations & Consequences

Any violation of the principles mentioned in this policy by any employee, contractor, consultant, trainee, or supply chain partner may have significant consequences, including fines and other penalties for improper conduct, potential prosecution, imprisonment, and/or disciplinary action up to and including termination.

12. Periodic Review

SSWL's P&A Head, in consultation with the Board of Directors and Executives, shall periodically review and update the policy to reflect applicable law(s) and/or the latest notifications released by the regulating authorities. To ensure the policy's effectiveness, SSWL may enhance, amend, or revise it at its discretion from time to time.

Prepared By:	Approved By:
Lead PM & Strategy	General Manager-P&A

STEEL STRIPS WHEELS LTD. Chandigarh

** End of Document**

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