SANCTIONS POLICY

1. Introduction

At Grasim Industries Limited ("Grasim" or the "Company"), we believe in sound, moral, ethical, and business principles. While these principles underpin all our activities, there is a need to ensure they are practiced in letter and spirit. Grasim's Sanctions Policy outlines the Company's zero-tolerance approach towards violations of applicable economic sanctions, export controls, and other trade compliance laws. The objective of this Policy is to place clear guidelines across all operations and business relationships to ensure compliance with sanctions and other related regulatory requirements.

2. Scope & Commitment

This Sanctions Policy applies to all employees or associates working on behalf of the Company. The Company's business activities must not be conducted in violation of applicable sanctions, export control, or foreign trade laws.

The Company strictly prohibits any direct or indirect dealings with sanctioned individuals, counter parties, countries, banking and financial institutions, cargo shipments, prohibited goods, software, technology, or services except where legally permissible and appropriately approved. It also forbids any attempt to evade or circumvent applicable sanctions or export control laws. Where the Company engages in goods, software, or technology subject to export controls or capable of dual civilian and military use, the Company shall adopt risk-based export-control measures, including due diligence and compliance with applicable laws, as required.

This Policy shall be read in conjunction with all other applicable policies, procedures, standards, and guidelines issued by the Company from time to time. Words and expressions used herein but not specifically defined in this Policy shall have the meanings assigned to them under the applicable laws and regulations.

3. Sanctions Regulatory Framework

The sanctions regulatory framework applicable to the Company includes sanctions laws, regulations, restrictive measures and trade controls arising under Indian law and foreign sanctions regimes that may have jurisdiction over, or otherwise be relevant to, the Company's operations, business relationships and transactions.

Such sanctions regimes may include, but are not limited to, measures implemented by the Government of India pursuant to UNSC Resolutions, directions issued by Ministry of Finance and other competent Indian authorities, and applicable counter-terrorism and counter-proliferation laws, as well as sanctions administered by foreign authorities and supranational bodies, including United States Office of Foreign Assets Control (OFAC), the European Union and United Kingdom of Financial Sanctions Implementation (OFSI).

4. Risk Based Sanctions Screening and Controls

The detailed operational procedures supporting this Framework are separately under the Company's internal protocols and advisories.

5. Governance and Oversight

Business Units and employees must remain vigilant in identifying and managing sanctions risks, implement applicable sanctions controls, conduct screening and due diligence measures, and promptly escalate any concerns, red flags, or potential breaches in accordance with the Company's internal procedures. The Grasim Legal & Compliance department (GLCD) shall be responsible for the administration and periodic review of this Policy, the interpretation of applicable sanctions requirements, and the facilitation of internal decision-making and escalation. Senior Management shall ensure the effective implementation of this Policy across the Company's business units and geographies and ensure that adequate resources are made available to support compliance efforts, while exercising oversight of the sanctions compliance.

6. Consequences of non-compliance

Failure to comply with applicable sanctions laws, regulations, or the requirements set out under this Policy may expose the Company and/or the concerned individual to regulatory investigations, monetary penalties, enforcement actions, or other legal and regulatory consequences. Such non-compliance may also result in financial losses, contractual termination, disruption or restriction of business operations, and adverse impacts on the Company's reputation and its banking, commercial, and business relationships.

In addition, any employee, officer, or representative found to be in breach of this Policy may be subject to disciplinary action in accordance with applicable laws and the Company's internal policies and procedures.

7. Questions

For additional details regarding Sanctions, or for inquiries pertaining to this Sanctions Policy, please reach out to the Grasim Legal and Compliance Department at grasim.legal@adityabirla.com

This Policy shall be reviewed periodically for its suitability and updated as necessary.

Himanshu Kapania

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Managing Director, Grasim Industries Limited

04th November, 2026