

Anti-Bribery and Anti-Corruption Policy

L&T's philosophy on corporate governance is built on a rich legacy of fair and transparent compliance and disclosure practices. This includes respect for human values, individual dignity, integrity and adherence to honest, ethical and professional conduct. This Anti-Bribery and Anti-Corruption ('ABAC') Policy is the guiding framework for ensuring compliance with various legislations and standards of behaviour to which we must all adhere, enforcing that, wherever we operate, we do not engage in any activity amounting to bribery, corruption or any other unethical business practices.

Guiding Principles

Towards this, we shall:

- Commit to uphold all applicable laws, in the countries we operate, relevant to countering bribery and corruption practices in all its forms, including extortion, conflict of interest, forgery, fraud, money laundering, insider trading and related to any of the aforementioned practices.
- Govern the behavior and set out responsibilities for all directors, executives, employees and associated persons in the conduct of business.
- 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.
- Have appropriate controls and systems in place to prevent, monitor, record and report issues pertaining to the ABAC Policy within and outside organisation.
- Provide training, information and guidance for those working for the Company, including but not limited to the Company's supply chain and any third party (or their affiliated enterprises conducting business with the Company) for identification, deterrence, reporting of bribery and corruption related issues and effective compliance and implementation of this Policy.
- Promote a culture of merit, honesty, transparency and integrity within the Company.

This Policy is applicable to all employees working at all levels and grades of L&T, including Board Members, and Senior Managerial Personnel (Senior Officers), Covenanted Officers, Managers, Executives, Supervisors, Workers and other equivalent grades of employees of the Company and Fixed Term Contract employees.

The guidelines in the Policy supplement and should be read in conjunction with Code of Conduct for Board of Directors and Senior Management, Code of Conduct for Supervisory, Executive and Officers, Code of Conduct for Suppliers (which includes Intermediaries including Consultants/Agents/Business Partners/Vendors), the Whistle-Blower Policy, the Vendor and Channel Partners' Whistle-Blower Policy and any guidance published pursuant to this Policy. This Policy will be implemented through a detailed procedure to ensure compliance with the requirements.

This policy is in accordance with all applicable laws, regulations and relevant statutory provisions in relation to countering bribery and corruption applicable to us in the conduct of our business, including the Indian Prevention of Corruption Act, 1988 ("PCA"), and other applicable Indian statutes, as amended from time to time.

We will abide by the principles of this Policy in letter and in spirit.

1st July, 2024


S. N. Subrahmanyam
Chairman & Managing Director



LARSEN & TOUBRO