



**LTTS Global Statement on
Anti-bribery and Anti-corruption
Version 1.1**

Document History

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LTTS Global Statement on Anti-bribery and Anti-corruption

Why acting with highest ethical standards and integrity is essential

As an organization driven by ethics and fairness, LTTS is committed to conducting its business activities in accordance with all applicable laws and regulations that prohibit bribery or corruption such as the Indian Prevention of Corruption Act, 1988, U.S. Foreign Corrupt Practices Act (“FCPA”), 1977, and U.K. Bribery Act, 2010 and all such other anti-bribery and anti-corruption laws of the countries where LTTS or its clients operate. This prohibition against bribery and corruption is a cornerstone of LTTS’s commitment to conducting business in an ethical and transparent manner, which is one of the core values reflected in [LTTS’ Code of Conduct \(CoC\)](#). Ethics & Integrity is a core value at LTTS, and employees are required to live the value at all times, individually and collectively. “Ethical beyond any doubt; always doing the right thing” is our credo. LTTS expects all its employees, consultants, and business partners to abide by this anti-bribery and anti-corruption standard. Our commitment to anti-bribery and anti-corruption builds on our corporate responsibility towards our customers, shareholders, and colleagues to deter, prevent, detect, and respond to all possible incidents of bribery and corruption.

KEY PRINCIPLES

- LTTS values its reputation for maintaining ethical behaviour, integrity, and reliability.
- LTTS is committed to demonstrating compliance with all applicable laws.
- LTTS follows a zero-tolerance policy towards all forms of bribery and corruption.
- All persons working with LTTS or on behalf of LTTS in any capacity, including employees at all levels, directors, interns, agents, contractors, consultants, third-parties, and business partners are required to operate in an ethical manner with integrity and transparency.
- LTTS does not give, promise to give, bribe, make any payment, gift, hospitality, kickbacks, or other benefits with the expectation of gaining a business advantage nor it allows its third parties to do so.
- LTTS does not accept any payment, gift, or hospitality from third parties that is believed to have been offered with the expectation of a business advantage in return.
- LTTS does not retaliate against any individual who has reported any incident concerning bribery or corruption.
- LTTS will not engage in any activity that might lead to a breach of this statement.

What is bribery and corruption?

Corruption is a form of dishonest, fraudulent, or otherwise unethical or illegal conduct by a person in a position of power or public trust, based on improper influence for private gain. Bribery is the most common form of corruption which may mean offering, promising giving, or receiving anything of value as an inducement for an action which is illegal, unethical or a breach of trust or to reward a person for having acted in such manner. It’s important to understand that an act may still be considered as corrupt even if:

- a bribe does not succeed.
- a person authorizes or provides direction for a bribe, but no bribe is ultimately offered or paid.

What is ‘anything of value’?

“Anything of value” includes, but is not limited to:

- cash or something in kind such as cash equivalents, stocks, personal property, assurance, or forgiveness of a debt.
- lavish gifts, meals, entertainment, and travel—any corporate travel, gifts, entertainment, and meals must be proportionate to the occasion and comply with the gift & entertainment policy/standards as stated under the CoC.
- political contributions and charitable contributions made at the request of a government official or private business partner in order to obtain or retain business or to secure an improper business advantage.
- job offers or internship awards to government officials or their relatives in return of any favour.

Where do bribery and corruption risks typically arise?

Hospitality and entertainment: Bona fide hospitality and promotional or other business expenditure, which seeks to promote our brand, to better present products and services, or to establish cordial relations, is recognized as an established and important part of doing business. Hospitality, entertainment, or other business expenses provided to business partners and customers for these purposes are permitted, as long as they are reasonable and proportionate, and are not intended to influence the outcome of any business transaction.

Hospitality, entertainment, or other similar expenses are not permitted if:

- It is lavish or unreasonable in nature intended to influence the outcome of a business transaction.
- It is for the purpose of facilitating or expediting any decision to award new business, to renew existing business or to take any other action.
- It is given for personal benefit, friendship, personal acquaintances, or family purposes.

Giving and receiving gifts: In many countries where LTTTS does business there are generally accepted customs regarding the exchange of business gifts to strengthen business relationships. LTTTS generally permits the giving and receiving of business gifts of ‘nominal value’ that are customary business courtesies and are reasonable in value and frequency and sometimes this may require prior approval from designated LTTTS authority and as per the Gift Policy stated in the [Code of Conduct \(CoC\)](#).

Facilitation payments and Kickbacks: The Company does not make facilitation payments or “kickbacks” of any kind. “Facilitation or grease payments” are payments that facilitate a normal governmental function, such as to expedite processing paperwork.

Kickbacks are payments made in return for a business favour or advantage and can include discounts or other types of cash incentives.

While these types of payments may be accepted as “a cost of doing business” in some cultures, they are illegal and are contrary to our ethical and moral values.

Use of agents and third parties: The actions of an agent, or third party acting on LTTTS’ behalf, can expose LTTTS to liability under anti-bribery and anti-corruption laws, and hence, a level of due diligence appropriate to the market may be undertaken prior to the appointment of an agent or third party, and at renewal of any agreement with an agent or third party. LTTTS may require annual audits to be conducted on such agents and third parties to ensure compliance with the laws on anti-bribery and anti-corruption and the principles stated herein.

Where and how to report instances of bribery and corruption?

Employees and representatives should seek clarification on any questions or concerns regarding activities under consideration or the interpretation of any law. If a bribe is offered from a person or entity doing business with or seeking to do business with LTTTS, the employees have a responsibility to report it immediately to their immediate manager or through the appropriate reporting channel. If employees are offered something of value and are uncertain whether they are allowed to accept it, they are required to refer to the Gift Policy stated in the CoC or consult their manager. Violations must be reported by using the established reporting mechanism or online reporting form (available on the intranet or internet). Our whistleblower policy protects those who report concerns in good faith.

What are the consequences of not meeting these standards?

Any non-compliance to these standards by an employee or third-party or business partners may result in legal/disciplinary action and/or termination of the business relationship.

Responsibility of LTTTS employees, third-parties, and business partners

- All employees and third-parties must have read, understood and comply with this statement.
- Prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. Employees and third parties are required to avoid any activity that might lead to, or suggest, a breach of this statement.
- All instances of bribery and corruption including any conflict or suspicion that a conflict with this statement has occurred or may occur in the future should be reported through authorized channels without delay.
- Employees unsure about whether a particular act constitutes bribery or corruption, must raise it with their manager.
- All vendors, suppliers, contractors, and business partners working with us must be made aware about our zero-tolerance approach to bribery and corruption at the outset of the business relationship.