



LLOYDS ENGINEERING WORKS LIMITED

(Formerly known as "Lloyds Steels Industries Limited") (hereinafter referred as 'Company')

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Purpose

- 1.1. Lloyds Engineering Works Limited has zero tolerance towards bribery and corruption. This policy establishes the principles with respect to applicable Anti-Bribery and Anti-Corruption laws.
- 1.2. The policy provides information and guidance as to how to recognise and deal with bribery and corruption issues.
- 1.3. It guides us to act professionally, fairly and with utmost integrity in all our business dealings and relationships.

2. Governance

- 2.1. The HR Head is responsible for doing periodic review and update this policy to reflect changes in applicable law(s) and /or latest notifications released by the regulators from time to time.
- 2.2. Any changes to this Policy shall be tracked and documented for future reference and all changes shall be performed by the HR Head only after prior approval of the management.
- 2.3. HR Head is responsible for regularly monitoring the effectiveness and review the implementation of the compliance principles set forth in this Policy.
- 2.4. All individuals including Directors, Senior Managers, Officers, Employees (including Permanent or temporary), Consultants, Contractors, trainees, service providers, workers and casual workers or any other person(s) associated with the Company, wherever located, are responsible for the successful implementation of the principles set forth in this policy and should ensure they use it to disclose any suspected concern or wrongdoing.
- 2.5. Any violation of this policy may have significant consequences, including potential prosecution, fines and other penalties for improper conduct, as well as imprisonment and/or disciplinary action up to and including termination of the concerned.

3. What is the meaning of bribery and corruption?

Corruption is a form of dishonest, fraudulent, or otherwise unethical or illegal conduct or abuse of power 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, soliciting or receiving anything of value as an inducement for doing an activity which is illegal, unethical or a breach of trust or to reward a person for having acted in such manner. It is pertinent to note and understand that an act may still be considered as corrupt even if:

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

4. 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 Code of Conduct, private business partner in order to obtain or retain business or to secure an improper business advantage, receiving a loan or guarantee of an obligation as a result of the position with the company.
- job offers or internship to government officials or their relatives in return of any favour.
- Offering / giving false political or charitable donations.

5. Where do bribery and corruption risks typically arise?

5.1 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 and is intended to influence the outcome of a business transaction.
- It is given for personal benefit, friendship, personal acquaintances, or family purposes.
- 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.

5.2 Giving and receiving gifts: In many communities and states, where Lloyds Engineering Works Limited does business, there are generally accepted customs regarding the exchange of business gifts to strengthen business relationships. Giving or receiving of business gifts of 'notional value' that are customary business courtesies and are reasonable in value and frequency are generally permitted at Company. However, in some cases, this may require prior approval from designated authority of the Company and as per the Gift Policy stated in the Code of Conduct.

5.3 Facilitation payments and Kickbacks: The Company does not make and prohibits any kind of facilitation payments or "kickbacks". "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.

5.4 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 from the HR Head. If a bribe is being offered by a person or entity doing business with or seeking to do business with the Company, 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. Any violations reported in good faith are protect under the's Whistle Blower Policy.

5.5 Responsibility of Lloyds Engineering Works Limited 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 the Company or under the Company's 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 the Company must be made aware about our zero-tolerance approach to bribery and corruption at the outset of the business relationship.