

L&T INFRASTRUCTURE DEVELOPMENT PROJECTS LIMITED
GROUP GIFTS, HOSPITALITY AND ENTERTAINMENT POLICY AND
PROCEDURES

1. POLICY

1.1 This document sets out the Group's Policy on giving and receiving gifts, hospitality and entertainment (*GH&E*). It should be read in conjunction with the Group Anti-Bribery and Corruption Policy (available at <http://www.lntidpl.com/company/policies/>).

1.2 GH&E which is or may be regarded as, exceptional, lavish or disproportionate and/or intended to induce or reward improper conduct is prohibited.

1.3 Group employees must not offer, provide, accept or solicit gifts in the form of cash, cash equivalents, commissions, loans, securities or goods/services at below-market value.

1.4 The Group must pay all costs associated with GH&E (e.g. transport, accommodation and meals) directly to suppliers and not to the recipients of the GH&E.

1.5 GH&E must not be offered or provided to family members or friends of the recipient.

1.6 Approval of GH&E, including GH&E relating to Officials, is required in accordance with this Policy and must be obtained in advance of any offer or acceptance of GH&E. If circumstances clearly prevent obtaining advance approval, the GH&E must be reported to the Compliance Officer at the earliest available opportunity.

1.7 Failure to comply with this Policy may result in disciplinary action, including possible termination of employment.

1.8 If you have any questions about offering or accepting GH&E or the operation of this Policy, please contact the Compliance Officer.

2. APPROVAL PROCESS

2.1 Any GH&E in excess of Rs. 5,000 requires approval of the Compliance Officer. Any GH&E in excess of Rs. 15,000 requires the additional approval of the L&T IDPL Managing Director. GH&E given to the same recipient and on the same occasion must be considered and valued collectively.

2.2 Any Group employee wishing to offer or receive GH&E must complete the GH&E Approval Form (see **Appendix**) and submit it to the Compliance Officer for approval.

2.3 Set out below is a non-exhaustive list of factors which the Compliance Officer and (where required) the L&T IDPL Managing Director may take into consideration when deciding whether or not to approve a GH&E request:

Is the GH&E compliant with applicable laws, policies/procedures and market practice?

Is there a genuine business or commercial rationale for the GH&E?

Is the GH&E reasonable and proportionate having regard to the business rationale, position and status of the recipient and appropriate to the occasion?

Is the GH&E being given in an open and transparent manner? Is it to be given or received through an intermediary (rather than directly)?

Is the GH&E being given with undue frequency to the same recipient?

Is there any indication that the GH&E contains an element of reciprocity or an expectation of receiving something in return for the GH&E, or a risk that the GH&E will influence the intended recipient's objectivity?

Is the GH&E is being given at a time when prospective business or key business decisions/transactions involving the Group and the recipient (e.g. an award of a contract) are in contemplation (or have recently been concluded)?

Is the GH&E being given to an Official? If so, the GH&E should be carefully scrutinised and extreme caution exercised before granting approval.

3. RECORD KEEPING AND REVIEW

3.1 All GH&E must be properly recorded and accounted for in the Group's books and records and must be supported by original receipts.

3.2 All GH&E Approval Forms (whether approved or declined) must be held on file by the Compliance Officer for a period of five years.

3.3 GH&E with a value in excess of Rs. 10,000 must be recorded by the Compliance Officer in the Annual GH&E Central Register.

3.4 The Annual GH&E Central Register must be submitted to, and reviewed annually by, the Audit Committee.

3.5 The Compliance Officer, with the approval of the L&T IDPL Audit Committee, may periodically revise the thresholds set out in paragraphs 2.1 and 3.3 above to ensure they are set at an appropriate level.

3.6 The Compliance Officer, in consultation with the Audit Committee, may prescribe appropriate guidelines or criteria to aid the implementation of this Policy.

APPENDIX

GIFTS, HOSPITALITY AND ENTERTAINMENT APPROVAL FORM

Name of Applicant	
Job title/Department	
Recipient/Donor of the GH&E (attach a separate sheet where appropriate): Name and job title Company/organisation	
What is the nature of your business dealings with the recipient/donor and his/her company/organisation?	
Description of GH&E	
Purpose of GH&E	
Estimated value (in Rupees, per person and in aggregate)	
Does the GH&E involve an Official? If so, please provide details.	
Have GH&E been given previously to this recipient in this calendar year? If so, please provide details.	
Does the timing of the GH&E coincide with any key business decision / transaction in contemplation (or recently concluded) involving the Group or any Group employee and the recipient/donor of the GH&E? If so, please provide details.	
Any other relevant information	

I confirm that this GH&E complies with the L&T IDPL GH&E Policy	
Signature	Date
I confirm that this GH&E complies with the L&T IDPL GH&E Policy	
Pre-approved by [Compliance Officer] [Managing Director]	
Signature	Date
Signature	Date