



# L.G. BALAKRISHNAN & BROS LIMITED

## ANTI BRIBERY AND CORRUPTION POLICY

Whoever we may deal with, and wherever we may operate, we are committed to doing so lawfully, ethically and with integrity. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated. We must not, and we must ensure that any third party acting on our behalf does not, act corruptly in our dealing with any other persons.

This anti-bribery and corruption policy sets out LGB policies to prevent acts of bribery and corruption. These policies and procedures have been designed to comply with legislation governing bribery and corruption on a global basis.

This policy provides guidance on the standards of behaviour to which we must all adhere and most of these reflect the common sense and good business practice that we all work to in any event. This policy is designed to help you to identify when something is prohibited so that bribery and corruption is avoided, and provide you with help and guidance if you are unsure about whether there is a problem and you need further advice.

### WHO THIS POLICY APPLIES TO

The fundamental standards of integrity under which we operate do not vary depending on where we work or who we are dealing with. This policy applies to all LGB officers, employees across the group no matter where they are located or what they do. It is responsibility of each of us to ensure that we comply with these standards in our daily working lives. This policy sets out a single standard that all employees must comply with, regardless of whether local law or practices might permit something to the contrary.





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## GETTING HELP

If you are unsure about your obligation under this policy, you should contact one of the following people for help.

- In the first instance, your anti-bribery and corruption officer of the Company.
- The Deputy Managing Director  
6/16/13, Krishnarayapuram Road,  
Ganapathy Post  
Coimbatore- 641 006.

## WHAT IS BRIBERY?

**Bribery involves the following.**

When a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly (it does not have to be the person to whom the bribe is offered that acts improperly) or

When a financial or other advantage is requested, agreed to be received or accepted by another person with the intention of inducing or rewarding them or another person to perform their responsibilities or duties inappropriately (it does not have to be the person who receives the bribe that acts improperly)

**It does not matter whether the bribe is**

- Given or received directly or through a third party (such as someone acting on LGB behalf for example an agent, distributor, supplier, or other intermediary) or
- For the benefit of the recipient or some other persons.

**Bribes can take forms for examples.**

- Money (or cash equivalent such as shares)
- Unreasonable gifts, entertainment or hospitality
- Kickbacks
- Unwarranted rebated or excessive commission (eg to sales agents or marketing agents)
- Unwarranted allowances or expenses
- Facilitation payments/payments made to perform their normal job more quickly and or prioritise a particular customer.





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- Political/charitable contributions.
- Uncompensated use of company services or facilities
- Anything else of value.

This policy applies to both the public and private sectors. Dealing with public officials poses a particular high risk in relation to bribery and corruption and specific guidance when dealing with public officials is set out below.

### HOW DO I KNOW IF SOMETHING IS A BRIBE.

In most circumstances, common senses will determine when a bribe is being offered. However, here are few questions you should ask yourself if in doubt.

- Am i being asked to pay something or provide any other benefit over and above the cost of services being performed.
- Am i being asked to make a payment for services to someone other than the service provider.
- Are the hospitality or gifts i am giving or receiving reasonable and justified? Would i be embarrassed to disclose them?

### POLICIES AND PROCEDURES

#### General Prohibition

All forms of bribery and corruption are prohibited. We will not tolerate any act of bribery or corruption. Any breach of this policy or local law could result in disciplinary actions being taken and ultimately could result in dismissal.

A bribe does not actually have to take place- just promising to give a bribe or agreeing to receive one is prohibited.

Bribery is prohibited when dealing with any person whether they are in the public or private sector and the provisions of this policy are of general applications.

#### Dealing with public officials.

Although this policy applies to both public and private sectors, dealing with public officials poses a particularly high risk in relation to bribery due to the strict rules and regulations in many countries.

Public officials include those in government departments, but also employees of government owned or controlled commercial enterprises, international organisations, political parties and political candidates.





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The provision of money or anything else of value, no matter how small to any public official for the purposes of influencing them in their official capacity is prohibited.

**The prior approval of anti-bribery and corruption officer is required in relation to**

- Any payment in respect of fees, salary or commission (this does not include official fees)
- Gifts and hospitality and
- Making charitable contributions in connection with dealings with a public official.

In addition, many public officials have their own rules regarding the acceptance of gifts and hospitality etc and we must respect these rules where applicable.

In accordance with the LGB Code of Ethics, political donations by or on behalf of LGB are Prohibited.

### COMPLIANCE WITH THE POLICY

It is the responsibility of anti-bribery and corruption officer to ensure compliance with this policy in each business. Ultimate responsibility for compliance with this policy throughout the group is taken by the group Compliance officer. However, each of us has an obligation to act with integrity and to ensure that we understand and comply with the policy. Ongoing compliance will be monitored and reported by Internal Audit.

Training will be provided to relevant employees throughout the company to support them in complying with their responsibilities. If you are not selected for training but believe that it is relevant for you then please ask your HR Manager for further information. In addition all employees will be required to confirm that they have understood and complied with the policy annually.

### WHISTLEBLOWING.

LGB is committed to ensuring that employees can speak up with confidence if they have any concerns or need to ask for help. If you suspect or observe anything that you think might be in contravention of this policy, you have an obligation to report it. You should raise your concerns with your local anti-bribery and corruption officer in the first instance. Alternatively, you can report your concern under the Whistleblowing policy.





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LGB will not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behaviour. All reports will be treated confidentially.

  
P Prabakaran  
Deputy Managing Director