ANTI-BRIBERY AND

ANTI-CORRUPTION POLICY

OF

LLOYDS METALS AND ENERGY LIMITED

(CIN: L40300MH1977PLC019594)

Registered Office: Plot No. A 1-2, MIDC Area, Ghugus, Chandrapur, Maharashtra - 442505

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The Policy shall be maintained through the following revision and approval record:

Revision No.	Date of Approval
R0	16-03-2023
R1	03-11-2026

The Policy shall be approved by the Board of Directors and shall be reviewed periodically to ensure its continued relevance and effectiveness.

1. Introduction

Lloyds Metals and Energy Limited operates in a sector in which the value of a single regulatory decision, land approval, mineral concession, transport permit or contract award can be very large, and in which dealings with public authorities are constant rather than occasional. The Company also holds interests, through subsidiaries and associated undertakings, in jurisdictions where the perceived risk of corruption is materially higher than in India. Bribery risk in this business is therefore structural and must be managed by system rather than by instinct.

This Policy prohibits bribery and corruption in every form and sets out the procedures by which that prohibition is given effect. It is not a statement of aspiration. Section 9 of the Prevention of Corruption Act, 1988 makes a commercial organisation liable where a person associated with it gives an undue advantage to a public servant intending to obtain or retain business or an advantage for it, and provides a defence where the organisation proves that it had in place adequate procedures designed to prevent such conduct. This Policy, together with the procedures, registers, due diligence, training and monitoring it requires, is intended to constitute those adequate procedures. Its value as a defence depends entirely on whether it is operated, evidenced and enforced.

2. Objective

The objective of this Policy is to establish a comprehensive framework to prevent, detect and address bribery and corruption risks across LMEL's operations and value chain.

To ensure our commitment to this Policy, LMEL will strive to achieve the following objectives:

- Prohibit bribery and corruption in every form.
- Maintain adequate procedures under Section 9 of the Prevention of Corruption Act, 1988.
- Promote ethical business conduct and integrity.
- Ensure compliance with applicable anti-bribery and anti-corruption laws.
- Establish robust controls, due diligence and monitoring mechanisms.

3. Scope and Applicability

2.1 This Policy applies to the Company, to each of its subsidiaries and controlled entities, and to all activities undertaken for or by any of them, directly or indirectly, in India and elsewhere.

2.2 It applies to every individual working at any level or grade, including directors, senior management, officers, employees whether permanent, fixed-term or temporary, apprentices, trainees, interns, seconded staff, casual and agency workers, and to consultants, contractors, agents, intermediaries, representatives and any other person performing services for or on behalf of the Company. Every such individual and entity is referred to in this Policy as a “Covered Person”.

2.3 This Policy is read with the Code of Conduct for the Board of Directors and Senior Management Personnel, the Whistle Blower Policy and Vigil Mechanism, the Corporate Social Responsibility Policy, the Human Rights Policy, the Related Party Transaction Policy and any guidance issued under this Policy. Where two instruments address the same matter, the more demanding requirement applies.

2.4 Where the Company holds an interest in an entity it does not control, it shall use its influence to promote standards consistent with this Policy, and shall record what it has done.

4. Governance and Accountability

The implementation of this Policy shall be overseen by the Board of Directors and the Audit Committee.

The Company Secretary and Compliance Officer shall be responsible for administration of this Policy, including risk assessments, due diligence, registers, training, investigations and reporting.

Management shall ensure implementation across operations and every Covered Person shall comply with the requirements of this Policy.

Responsibilities

4.1 Board and Audit Committee

The Board is accountable for this Policy and sets the expectation that business is not to be won or retained through improper payment. The Audit Committee oversees implementation, reviews the risk assessment, the registers maintained under this Policy, incidents and investigations and their outcomes, and the results of monitoring and audit, and satisfies itself at least annually as to the continued suitability, adequacy and effectiveness of the Policy. Any breach involving a director or a member of senior management, and any matter capable of giving rise to liability of the Company, shall be escalated immediately to the Chairperson of the Audit Committee and to the Board.

4.2 Compliance Officer

The Compliance Officer (CS and CFO) is responsible for the operation of this Policy, including the risk assessment, the registers of gifts and hospitality, solicitations, Third Parties and incidents, approvals required under this Policy, third-party due diligence, training, guidance, investigation and reporting to the Audit Committee. The Compliance Officer shall have direct access to the Chairperson of the Audit Committee and the authority to require the suspension of a transaction pending assessment.

4.3 Management

Every person in a managerial position is accountable for the conduct of the team and of the Third Parties engaged for work within that person's area, for ensuring that they are aware of and trained in this Policy, and for escalating rather than resolving locally any demand for or offer of an Undue Advantage.

4.4 Every Covered Person

Every Covered Person shall comply with this Policy, complete the training required, seek guidance where an issue is unclear, report any breach, attempted breach or red flag, and co-operate fully with any enquiry or investigation. Two questions should be asked before acting: what is the intent behind the benefit, and how would the arrangement read if it were set out in full on the front page of a newspaper.

5. Policy Commitments

5.1 Legal Compliance

The Company shall comply with all applicable anti-bribery and anti-corruption laws and regulations, including the Prevention of Corruption Act, 1988 and other relevant statutory requirements.

5.2 Prohibited Conduct

No Covered Person shall, directly or through any other person, offer, promise, give, authorise, request, agree to receive or accept any Undue Advantage in connection with the business of the Company. The prohibition applies whether the counterparty is a Public Official or a private person, whether the benefit is for the recipient or for another, whether the payment is made before or after the act it relates to, and whether or not the conduct is customary in the place where it occurs. It applies equally to conduct by a Third Party where the Company knows, or has reason to suspect, that this is what is happening.

Kickbacks in any form are prohibited. Facilitation payments are prohibited. The Company accepts that this may result in delay, and it does not accept delay as a justification for payment. Where a Covered Person is compelled to make a payment by a threat to personal safety or liberty, the payment may be made, but the person shall report it to the Compliance Officer within twenty-four hours and the Company shall record it accurately in its books and consider whether to report it to the appropriate authority. Under the Prevention of Corruption Act, 1988 a person compelled to give an undue advantage is protected only if the matter is reported to a law enforcement authority within seven days, and the Compliance Officer shall act with that period in mind.

No Covered Person shall retaliate against, or permit adverse consequence to fall upon, any person who declines to pay a bribe or who reports a demand for one. A refusal that loses the Company a contract or causes a delay is the correct outcome under this Policy and shall be treated as such.

5.3 Gifts, Hospitality, Travel and Entertainment

5.3.1 The Company does not prohibit the giving or receiving of modest and customary business courtesies. It prohibits any gift, hospitality, entertainment, travel, accommodation or similar benefit that is intended to influence a business or official decision, or that could reasonably be perceived as intended to do so.

5.3.2 A gift or hospitality is permissible only where it is given openly and not in secret; is proportionate and customary for the occasion and the seniority of the recipient; is not cash or a cash equivalent; is not lavish, frequent or repeated to the same recipient; is not solicited; is capable of being disclosed without embarrassment; and is recorded and, where required by Annexure B, approved in advance.

5.3.3 No gift, hospitality, travel, accommodation or benefit of any value shall be offered to a Public Official except in accordance with the thresholds and approvals at Annexure B, and no such benefit shall be offered at any time while a tender, contract award, claim, inspection, assessment, approval or regulatory decision involving that official or the authority concerned is pending. Where the Company properly meets the travel or accommodation cost of an official visit connected with its operations, the arrangement shall be made with the authority rather than the individual, shall be documented, and shall not extend to family members or to leisure components.

5.3.4 A gift that cannot be declined without causing offence shall be accepted on behalf of the Company, surrendered to the Compliance Officer and recorded in the gift register.

5.3.5 The Compliance Officer shall maintain a gift, hospitality and entertainment register recording the giver, the recipient, the occasion, the nature and value of the benefit, the approval obtained and the business rationale. The register shall be reviewed by internal audit and summarized to the Audit Committee annually.

5.4 Public officials and interaction with government

Dealings with government are conducted openly, accurately and through proper channels. A Covered Person representing the Company before any authority shall be truthful and complete, shall not offer or imply any benefit, and shall record the substance of material interactions. Applications, returns and submissions shall be accurate, and no person shall procure or accept an approval known to have been obtained on a false basis.

Where an official solicits an Undue Advantage, the demand shall be declined and reported to the Compliance Officer on the same day. The Compliance Officer shall maintain a register of solicitations, shall consider in each case whether to report the matter to the appropriate authority, and shall report the register to the Audit Committee. A recurring pattern of solicitation at a particular location or process shall be treated as a control matter requiring escalation, not as a local difficulty to be managed locally.

Engagement of lobbyists, liaison agents or representatives to interact with government on the Company’s behalf requires the prior written approval of the Compliance Officer, a written scope of work, remuneration on a basis unrelated to the outcome of any decision, and reporting of activity undertaken. Success fees contingent upon the grant of an approval, permit, licence or clearance are prohibited.

5.5 Employment and engagement of public officials and their relatives

The offer or provision of employment, internship, consultancy, contract or business opportunity to a Public Official, to a former Public Official within the period during which any post-employment restriction applies, or to a relative or close associate of a serving Public Official, may itself constitute an Undue Advantage. No such offer shall be made without the prior written approval of the Compliance Officer, who shall record the basis on which the appointment is justified on merit and the safeguards applied, including recusal of

the person from any matter involving the authority concerned. The same requirement applies to the engagement of an entity in which a Public Official or a relative holds an interest.

5.6 Third parties, agents and intermediaries

5.6.1 The Company may be held liable for a bribe paid on its behalf by a Third Party even where it did not authorise the payment. Third parties are accordingly the Company's principal area of exposure and are controlled as such.

5.6.2 No Third Party shall be engaged without risk-based due diligence completed and documented before engagement, at the level set out at Annexure C. Due diligence shall address ownership and beneficial ownership, the identity of any Public Official connected with the entity, capability to perform the services, reputation, adverse media, sanctions and politically exposed person screening, and the commercial rationale for the engagement.

5.6.3 Every engagement shall be on a written contract containing anti-bribery and anti-corruption representations and undertakings, an obligation to maintain accurate records, rights of audit and information, an obligation to report any demand for or offer of an Undue Advantage, and a right of immediate termination for breach. A Third Party that refuses these terms shall not be engaged.

5.6.4 Remuneration shall be commensurate with the services actually rendered, paid to the contracting party in the jurisdiction of its business and into an account in its own name, against invoices describing the work performed. Payments in cash, to third-party accounts, to offshore accounts unconnected with the engagement, or in advance of performance without recorded justification, are prohibited.

5.6.5 Due diligence shall be refreshed periodically according to the assessed risk tier, and on any change of ownership, scope or red flag. The Compliance Officer shall maintain a register of Third Parties engaged, their risk tier, the date of last due diligence and the contractual protections obtained.

5.7 Joint ventures, acquisitions and partnerships

Anti-bribery and anti-corruption due diligence shall be conducted before any acquisition, joint venture, partnership or material investment, addressing the target's dealings with Public Officials, its use of intermediaries, its books and records, and any history of investigation or enforcement. Findings shall be reported to the Board with the transaction recommendation, and shall be reflected in warranties, indemnities, conditions and pricing. Following completion, this Policy and its procedures shall be extended to the acquired business within a period approved by the Audit Committee, and a post-acquisition review conducted to confirm implementation. Historic conduct identified before or after completion shall be assessed for reporting obligations rather than absorbed.

5.8 Political contributions

No Covered Person shall make or promise any political contribution using the funds, assets, name or resources of the Company. The Company shall make a political contribution only where it is lawful, only with the prior approval of the Board recorded by resolution, only through such modes of payment as are permitted by law at the time, and only in the manner and subject to the conditions and disclosure required by Section 182 of the Companies Act, 2013. Contributions shall be disclosed in the financial statements as required. Support for a political party or candidate in a personal capacity is a private matter, shall be conducted outside working hours and without the use of Company resources, name or premises, and shall not be represented as the Company's position.

5.9 Charitable donations, community contributions and sponsorship

Charitable donations, community contributions and sponsorships are legitimate and are also a recognised route by which improper benefits are conferred. A donation or sponsorship shall not be made where it has been requested, suggested or expected by a Public Official, a customer or a counterparty in connection with a decision affecting the Company; where the recipient is connected with such a person; where the end use cannot be established; or where it is made otherwise than to a lawfully constituted organisation

registered under applicable law. Background checks shall be conducted proportionate to the amount and the context. Every donation and sponsorship shall be approved in accordance with the Company's delegation of authority, documented with its rationale, paid through banking channels to the organisation and not to any individual, and supported by evidence of application to the stated purpose.

Expenditure under the Corporate Social Responsibility Policy is governed by that policy and by the Companies Act, 2013. This Policy applies to it in addition, and the requirement of that policy that corporate social responsibility funds not be used to obtain a commercial, regulatory or reputational advantage is restated here as an anti-corruption control.

5.10 Operating in higher-risk environments

At locations where access to a site, the movement of material, or the security of people and assets depends on the co-operation of local actors, requests for payment, employment, contracts, vehicles, fuel or other benefits may be made in terms that are difficult to refuse. Such demands shall not be met by informal payment. They shall be reported to the Compliance Officer and to the Director — ESG, addressed through documented arrangements consistent with this Policy and the Human Rights Policy, and, where they involve public or private security forces, dealt with under the security and human rights provisions of that policy. Payments or benefits provided to security forces shall be lawful, transparent, recorded in writing and made through the authority concerned rather than to individuals. Community payments and benefits shall be made through documented programmes rather than to intermediaries, and shall not be used to secure access, consent or the withdrawal of objection.

5.11 Customers, discounts, rebates and commissions

Discounts, rebates, credit terms, free material and commissions are ordinary commercial arrangements and are also capable of concealing improper inducement to an individual within a customer or counterparty. Such arrangements shall be approved in accordance with the delegation of authority, extended to the counterparty entity and not to any individual, documented in the contract or in a recorded approval, reflected accurately in the invoice and in the accounting records, and applied on a consistent and explicable basis. The provision of a benefit to an individual employee of a customer, or the granting of a discount not disclosed within the customer's own organisation, is prohibited.

5.12 Statutory payments and dealings with authorities

Duties, royalties, cess, contributions to the District Mineral Foundation and the National Mineral Exploration Trust, fees, levies, penalties and other statutory payments are lawful obligations and are not within the prohibition in clause 4. They shall be computed correctly, paid within time, made only through official channels against official receipts, and recorded accurately. No payment shall be made to any individual in connection with the assessment, computation, waiver, reduction or deferral of any such liability, and no assessment shall be procured on a basis known to be incorrect.

5.13 Books, records and internal control

Every transaction shall be recorded accurately, completely, in reasonable detail and in the period to which it relates. No false, misleading or incomplete entry shall be made, and no fund, asset or account shall be maintained off the books. Expense claims relating to gifts, hospitality, travel, donations, sponsorship and payments to Third Parties shall state the purpose, the recipient and the business rationale, and shall be supported by evidence. The system of internal financial control shall include controls over the approval and recording of these categories of expenditure, and their operation shall be tested by internal audit. No Covered Person shall obstruct or seek improperly to influence any internal, statutory, secretarial, cost or forensic auditor.

5.14. Training and communication

Every employee shall receive training on this Policy on joining and at least once in every two years thereafter. Persons in roles carrying elevated exposure, including procurement, sales and marketing, logistics, land and liaison, statutory approvals, finance, security and the management of Third Parties, and

all senior management, shall receive role-specific training annually and shall provide an annual written confirmation of compliance. Completion shall be recorded and reported to the Audit Committee. This Policy shall be published on the website of the Company, communicated to Third Parties on engagement, and made available in the languages of the locations at which the Company operates.

5.15. Monitoring, assurance and reporting

The operation of this Policy shall be tested through the internal audit programme at least annually, covering the completeness of the registers, the quality and timeliness of third-party due diligence, compliance with the gift and hospitality thresholds, approvals for donations and sponsorships, the accuracy of records supporting sensitive expenditure, and the closure of previous findings. The Compliance Officer shall report to the Audit Committee at least half-yearly on the risk assessment, register activity, training completion, incidents and investigations, audit findings and their closure, and any regulatory contact. Material findings shall be reported to the Board.

5.16 Records Management

Records created under this Policy, including registers, due diligence files, approvals, training records and investigation files, shall be retained for the period required by law and in any event for not less than eight years from the end of the financial year to which they relate, in a form that permits the Company to demonstrate the operation of its procedures. Personal data within those records shall be handled in accordance with the Data Privacy and Personal Data Protection Policy.

6. Anti-Bribery and Corruption Risk Assessment Approach

The Compliance Officer shall conduct a documented bribery and corruption risk assessment covering the Company and its controlled entities, addressing the sectors and jurisdictions in which they operate, the nature and frequency of interaction with Public Officials, reliance on intermediaries, the transaction types most exposed, and the adequacy of existing controls. The assessment shall be performed at least once in every two years, and additionally on entry into a new jurisdiction, a material acquisition or joint venture, a significant change in the regulatory environment, or the occurrence of a substantiated incident. It shall be placed before the Audit Committee, and the controls in this Policy shall be calibrated to its findings, with enhanced measures applied to operations and counterparties assessed as higher risk.

7. Grievance and Feedback Mechanism

Any person may raise a concern about actual or suspected conduct contrary to this Policy with the Compliance Officer, through the Whistle Blower Policy and Vigil Mechanism, or directly to the Chairperson of the Audit Committee. Concerns may be raised anonymously. The Company shall not permit harassment, retaliation or adverse consequence of any kind against a person who raises a concern in good faith, whether or not it is substantiated, and any such retaliation shall itself be a serious breach of this Policy. The identity of a person raising a concern shall be protected so far as is consistent with a fair investigation and with the law.

Investigation and consequences

7.1 Reported concerns shall be assessed promptly and investigated by or under the oversight of the Compliance Officer, with external forensic or legal expertise engaged where warranted, and with the investigation of any matter involving the Compliance Officer or a member of senior management conducted independently of that person under the direction of the Audit Committee.

7.2 Investigations shall follow the principles of natural justice. The person concerned shall be informed of the substance of the allegation and given a reasonable opportunity to be heard, save where the interests of the investigation or the requirements of law direct otherwise. Records and communications relevant to the matter shall be preserved and shall not be destroyed or altered.

7.3 Where a breach is established, consequences may include recorded warning, withdrawal of authority, adjustment or forfeiture of variable pay, recovery of amounts paid where permitted by law, suspension and termination of employment, and, for a Third Party, suspension of work, financial consequence under the contract and termination. Where the conduct discloses an offence, the matter shall be reported to the appropriate authority and the Company shall co-operate with the investigation.

7.4 The Company shall not pay any fine or penalty imposed on an individual for a criminal offence under anti-corruption law, nor indemnify a person against the consequences of deliberate wrongdoing.

8. Public Disclosure

This Policy shall be published on the Company's website, internal repository and communicated to relevant third parties on engagement.

The Company shall make this Policy available to employees, contractors, suppliers, business partners and other stakeholders through appropriate communication channels.

9. Review of Policy

The Compliance Officer shall review this Policy at least annually and place it before the Audit Committee and the Board for approval of any amendment, and shall review it earlier upon a change in the applicable law, a material change in the Company’s operations or jurisdictions, or a substantiated incident. The Board may amend this Policy at any time, an amendment taking effect from the date of the meeting at which it is approved unless otherwise specified.

Annexure A — Red flag indicators

The following are indicative and not exhaustive. Any one of them, and in particular any combination, requires escalation to the Compliance Officer before the transaction or engagement proceeds.

1. A Third Party's principal, owner or beneficial owner is a Public Official, a relative of one, or a person who cannot be identified.

2. A Public Official suggests, requests or insists that a particular person, entity or intermediary be engaged, particularly where that official has discretion over a matter affecting the Company.

3. The Third Party lacks the qualifications, staff, premises or track record to perform the services offered, or the scope of work is vague or generic.

4. The Third Party guarantees a result, or claims an ability to obtain a licence, permit, clearance or approval, without explaining the legitimate means by which it will be done.

5. Remuneration is unusually high relative to the market, is structured as a success fee tied to an approval, or is a percentage of an award without evident justification.

6. Payment is requested in cash, to a third party, to an account in another name, to a jurisdiction unconnected with the services, or split across multiple accounts.

7. The Third Party refuses anti-bribery, anti-money laundering, audit or information clauses, or refuses access to books and records provided for in the contract.

8. The Third Party declines to identify its principals, associates or sub-contractors, or discloses that it shares its fee with undisclosed persons.

9. The Third Party insists on dealing with officials without the participation or knowledge of the Company.

10. Invoices are vague, lack supporting evidence, are duplicated, or are submitted for amounts just below an approval threshold.

11. Expenditure on gifts, hospitality or travel for a particular counterparty is frequent, escalating, or coincides with a pending decision.

12. A donation, sponsorship or community contribution is requested by or routed towards a person connected with a decision affecting the Company.

13. Due diligence discloses a history of investigation, enforcement, adverse media or a reputation for a "special relationship" with government.

14. Approvals are obtained unusually quickly, or in terms more favourable than the application supports.

15. An employee resists rotation, audit or the disclosure of a counterparty relationship, or has an unexplained personal connection to a counterparty.

16. A counterparty seeks to renegotiate terms immediately after award, or an award is made to a bidder whose evaluation record is incomplete.

Annexure B — Gifts and hospitality: thresholds and approvals

[Monetary thresholds to be set by the Audit Committee and reviewed annually. The approval structure below is the control; the figures are the calibration.]

Category	Position	Approval and record
Cash or cash equivalent, to anyone	Prohibited without exception	Not available
Gift to or from a private counterparty, below the de minimis threshold	Permitted if it meets the tests in clause 6.2	Record in the register
Gift to or from a private counterparty, above the de minimis threshold	Permitted only with prior approval	Prior written approval of the Compliance Officer; record in the register
Hospitality or entertainment with a private counterparty	Permitted if proportionate, infrequent, and attended by the Company's representative	Record in the register; prior approval above the threshold
Any gift to a Public Official	Prohibited other than a ceremonial item of nominal value given openly	Prior written approval of the Compliance Officer; record in the register
Hospitality for a Public Official	Permitted only where incidental to a legitimate business purpose and modest	Prior written approval of the Compliance Officer
Travel or accommodation for a Public Official	Permitted only for an official visit connected with the Company's operations, arranged with the authority	Prior written approval of the Compliance Officer and the Managing Director; no family members, no leisure component
Anything offered while a decision involving the recipient is pending	Prohibited	Not available
Gift that cannot be declined without offence	Accept on behalf of the Company	Surrender to the Compliance Officer; record in the register

Annexure C — Third-party due diligence tiers

Tier	Applies to	Minimum due diligence
High	Third parties interacting with Public Officials on the Company's behalf; liaison, clearing and lobbying agents; intermediaries in higher-risk jurisdictions; joint venture partners; any counterparty with a Public Official connection	Full questionnaire; beneficial ownership identification; sanctions, politically exposed person and adverse media screening; reputational enquiry; financial standing; site or premises verification; Compliance Officer approval; enhanced contract terms; refreshed annually
Medium	Significant contractors, suppliers and service providers not interacting with Public Officials; distributors and marketing intermediaries	Questionnaire; ownership identification; sanctions and adverse media screening; standard contract terms; refreshed every two years or on change
Low	Routine suppliers of goods and services of low value with no government interface	Standard vendor onboarding checks; standard contract terms; refreshed on change of ownership or on a red flag

A red flag at any tier requires escalation to the Compliance Officer and completion of the enhanced measures applicable to the High tier before the engagement proceeds.

Annexure D — Principal legal framework

This summary is for guidance and does not substitute for legal advice. Where the Company operates in a jurisdiction not covered here, local counsel shall be consulted and the requirements applied in addition to this Policy.

Prevention of Corruption Act, 1988 (India), as amended in 2018

A public servant who obtains or accepts, or attempts to obtain, an undue advantage with intent to perform a public duty improperly or dishonestly, or to forbear from performing it, is liable to imprisonment of not less than three years and up to seven years, and to fine. "Undue advantage" means any gratification other than legal remuneration and is not confined to money or to benefits estimable in money.

A person who gives or promises an undue advantage to a public servant commits an offence punishable with imprisonment of up to seven years, or fine, or both. A person compelled to give an undue advantage is protected where the matter is reported to a law enforcement authority within seven days.

A commercial organisation is liable where a person associated with it gives or promises an undue advantage to a public servant intending to obtain or retain business or an advantage for it. It is a defence for the organisation to prove that it had in place adequate procedures designed to prevent such conduct. "Commercial organisation" includes a body incorporated outside India that carries on business in India. Where the offence by a commercial organisation is proved to have been committed with the consent or connivance of a director, manager, secretary or other officer, that person is liable to imprisonment of not less than three years and up to seven years, and to fine.

Bribery Act 2010 (United Kingdom)

Offences include bribing another person, being bribed, and bribing a foreign public official. A commercial organisation commits a separate offence where a person associated with it bribes another intending to obtain or retain business or an advantage for it, subject to a defence that the organisation had adequate procedures in place. The Act applies to an organisation carrying on a business or part of a business in the United Kingdom, irrespective of where the conduct occurs, and does not exempt facilitation payments.

Foreign Corrupt Practices Act, 1977 (United States)

The Act prohibits the corrupt offer or provision of anything of value to a foreign official to obtain or retain business, and imposes requirements as to accurate books and records and adequate internal accounting controls. Its reach extends to issuers, to domestic concerns, and to conduct with a sufficient connection to United States territory or persons.

Other Indian law

Section 182 of the Companies Act, 2013 governs political contributions by companies, including Board approval, the permitted modes of payment and the required disclosure. The Prevention of Money-Laundering Act, 2002 governs the proceeds of crime and imposes reporting obligations in specified circumstances. The Bharatiya Nyaya Sanhita, 2023 contains offences relating to cheating, criminal breach of trust, forgery and criminal conspiracy that may accompany corrupt conduct. Sections 447 and 448 of the Companies Act, 2013 address fraud and false statements. The mineral and environmental regulatory statutes under which the Company holds its approvals contain their own offences relating to false statements and the procurement of approvals by misrepresentation.