

## **L&T TECHNOLOGY SERVICES LIMITED (LTTS) – MODERN SLAVERY ACT STATEMENT**

### **1. LTTS MODERN SLAVERY STATEMENT**

This annual statement is published in accordance with Modern Slavery Act 2018, Australia and Modern Slavery Act 2015, United Kingdom (UK) for Financial Year 2024- 25 and sets out the actions we have taken to assess and address modern slavery and human trafficking risks in our operations and supply chains.

This statement is made on behalf of LTTS, for its below entities: -

Country	Name of the entity	Type of the entity	Registration number
Australia	L&T Technology Services Limited	Branch	ARBN: 606851245
UK	L&T Technology Services Limited	Branch	FC031465

### **2. OUR ORGANIZATION , OPERATIONS AND SUPPLY CHAIN**

#### **2.1 Our Organization Overview and Operations**

LTTS is a global leader in Engineering and Technology consulting services. Headquartered in India, we have over 24,250 employees across 23 global design centers, 30 global sales offices, and 108 innovation labs, as of March 31, 2025. Operating in 25 countries, with an annual revenue run rate of USD 1.4 Billion, LTTS, a listed subsidiary of Larsen & Toubro (L&T), offers design, development, consultancy, and sustenance services across products and processes. Our philosophy towards a sustainable future is based on the idea that by empowering our clients, employees, and stakeholders we can bring a real change towards healing the planet. To this end, we are committed to tracking and analyzing every aspect of our business activity, from our use of technology to operations to the service we offer for our customers.

**Purposeful. Agile. Innovation.** is how the Company drives growth across its three focus segments – Mobility, Sustainability and Tech segments. Its customer base includes 69 Fortune 500 companies and 57 top ER&D companies across industries.

The FY24-25 Integrated Annual Report of the Company is developed in accordance with the Integrated Reporting (IR) framework and the GRI (Global Reporting Initiatives) Standards. Our Business Responsibility and Sustainability Report for the financial year 2024-25 which forms a part of the LTTS Integrated Annual Report can be assessed on our website at <https://www.ltts.com/system/files/2025-05/LTTS-IAR-2024-25.pdf>

## 2.2 Our Supply Chain

At LTTS, our supply chain comprises of a robust network spanning multiple categories across providers of hardware, software, cloud services, talent management solutions, office space leasing, employee travel, and other relevant services. This global ecosystem ensures that we have access to the necessary resources and capabilities to sustain operational excellence and deliver value to our clients.

LTTS promotes sustainable sourcing in accordance with global sustainable practices which is laid out in the Supplier Code of Conduct (SCoC). Suppliers must agree to the SCoC requirements to promote human rights, protect the environment, reduce waste generation, reduce GHG emissions, comply with legal requirements, and refrain from engaging in practices including child labour, forced labour, and discriminatory hiring practices. The vendors must also support safe, healthy working conditions and welfare amenities.

## 3. OUR BUSINESS

As a socially and environmentally responsible business, we are focused on sustainable growth and building long-term stakeholder value. Our sustainability framework is based on environmental stewardship, diverse and inclusive talent pool, employee engagement, community care, robust policies, strict adherence to code of conduct, a robust risk management and compliance framework, highest governance standards, transparent and accountable reporting and disclosures.

## 4. REPORTING ENTITY'S STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### 4.1 Company Overview and Operations

LTTS supports the elimination of all forms of forced and compulsory labor to ensure that we trade ethically, source responsibly, and work to prevent modern slavery and human trafficking. We are committed to addressing the modern slavery risks in our business and supply chain and ensuring that we have effective systems and practices in place to combat slavery and human trafficking. This commitment underscores the key activities we have undertaken during this financial year to combat modern slavery in our organization and across our supply chain.

### 4.2 Complaint Mechanism

We have systems to encourage the reporting of concerns and protection of whistleblowers. All our employees including sub-contracted employees have access to complaint mechanism, where they can lodge complaints on various concerns not limited to use of child labor, modern slavery, forced, bonded, or indentured labor or involuntary prison labor, human trafficking etc. Our whistleblower policy can be accessed at <https://www.ltls.com/investors/corporate-governance>.

### 4.3 Periodic review

Our compliance framework, including our policies, procedures, supplier agreements, purchase order terms, code of conduct training modules, employee code of conduct and supplier code of

conduct are reviewed periodically for any changes relating to modern slavery and other regulations and updated for changes from time to time in compliance with applicable laws.

## **5. DUE DILIGENCE, RISK ASSESSMENT AND RISK MITIGATION PROCESSES FOR MODERN SLAVERY & HUMAN TRAFFICKING**

### **5.1 Due Diligence Process:**

At LTTS, we have developed and implemented adequate due-diligence procedures for onboarding new suppliers. Suppliers must agree to comply with our policies, applicable laws and regulations. We have a detailed onboarding process for our suppliers wherein we obtain pertinent registration and permit confirmations. We also carry out annual risk assessments for our suppliers and the supply chains to access, identify and address modern slavery risks, wherever required.

We guide internal teams about risks related to compliance requirements of prospective clients and other stakeholders. We explicitly clarify our commitment towards risk management and adherence to compliance standards during our interaction with prospective clients. We conduct an operational risk assessment exercise to identify issues and offer guidance for every project. It enables us to implement modifications and abide by regulatory norms. We will continue to undertake supplier awareness and oversight in our procurement and talent acquisition process for mitigating modern slavery risk.

### **5.2 Risk Assessment and Mitigation**

LTTS' Internal Audit (IA) team provides assurance to the Board of Directors and Executive Leadership on whether risk management, internal control and governance processes are adequate and functioning. The IA team is independent of the External Auditor. Results of IA's activities are reported to the Executive Directors who are responsible for the day-to-day management of the state of affairs of the Company. LTTS undertakes risk management with a focus on labour practices, human rights, compliance with regulatory requirements, policies and procedures through ongoing periodic assessments. We assess risks related to Human Rights across the value chain. Employment contracts and policy documents go through periodic reviews to ensure that there are no human rights violations.

## **6. TRAINING AND AWARENESS**

LTTS is committed to enhancing the capability of its various teams to understand, recognize and manage the risks of modern slavery in its own operations and across the entire supply chain. Regular training sessions and awareness campaigns are conducted to prevent unfair practices and inform employees about their rights within the organization. To inculcate cultural awareness and appreciation for a different perspective at the workplace, cross cultural trainings are conducted at the organization. It helps to foster mutual respect, trust, and clear communication between employees as well as other stakeholders. To create awareness and promote best practices, we have mandatory e-Learning training courses relating to the code of conduct for all our employees including sub-contracted employees.

## **7. ASSESSING EFFECTIVENESS IN FIGHTING SLAVERY AND HUMAN TRAFFICKING**

The Company uses a wide set of metrics to monitor human rights performance, both in operations and supply chain. LTTS has a widespread set of measures relating to employee wellbeing, diversity and inclusion which enables it to actively manage these aspects of the business throughout the year, and report on the performance publicly each year in its Integrated Annual report. LTTS oversees the supplier onboarding process through the ARIBA portal. Payroll systems are monitored through periodic internal audits. The Company has a Whistle Blower Policy in place since October 2014 to encourage and facilitate employees to report concerns about unethical behaviour, actual/suspected frauds, and violation of Company's Code of Conduct. The Policy provides for adequate safeguards against victimization of persons who avail the same and provides for direct access to the Chairman of the Audit Committee. The Audit Committee of the Company oversees the implementation of the Whistle-Blower Policy. Whistle blowers are assured by the management of full protection from any kind of harassment, retaliation, victimization, or unfair treatment.

## **8. REMEDIES FOR BREACH**

The Company with reference to the Whistle Blower mechanism has created an online platform "Ethics Line" which offers an independent multi-channel interface to employees for reporting unethical conduct/malpractice they may see around them, in case of any hesitation to report face to face. Through the said helpline employees raise their concerns and the same are addressed and necessary action is taken by the Company. The said helpline and the management always maintain anonymity of the whistleblower. It helps build a culture of trust, transparency, honest communication, and ethical conduct and provides employees with a non-threatening and impartial way of communicating their concerns while allowing the organization to act on the tip-offs as per process. We advocate "ZERO TOLERANCE" for values violation & unethical conduct at the workplace. To promote this culture, "Ethics Line" plays an important role. In case of failure to comply with the Code and policies as laid down by the Company, disciplinary actions may include but are not limited to immediate termination of employment.

## **9. CONSULTATIONS**

The policies and procedures outlined in this statement are uniform across all of LTTS's subsidiaries and branches. Teams across all branches and subsidiaries operate collaboratively to ensure each of LTTS's policies are appropriately enforced and upheld. LTTS continuously reviews the sufficiency and effectiveness of its policies and programs.

## **10. FURTHER STEPS**

We will include modern slavery in the scope of supplier audit program for covering suppliers at risk and will periodically review our modern slavery and human rights policies to align with regulatory requirements and internal policies.

## **11. DECLARATIONS**

This statement has been prepared by our Company pursuant to section 54 (1) of the Modern Slavery Act 2015, UK and Section 13 of the Modern Slavery Act, Australia in respect of the financial

year 2024-25. It sets the new and ongoing steps we are taking to address and prevent modern slavery taking place, both within our business and our supply chain. The Statement has been approved by the Board of Directors of our company on July 16, 2025.

## 12. STATEMENT ANNEXURE

Other Relevant Information: Mandatory criteria page number/s of our statement that addresses each of the mandatory criteria in Section 16 of the Modern Slavery Act 2018, Australia is summarised below:

### Modern Slavery Act 2018, Australia (Cth) – Statement Annexure

No.	Mandatory criteria	Page Number/s
A.	Identify the reporting entity	1
B.	Describe the reporting entity's structure, operations, and supply chain	1
C.	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	3 and 4
D.	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	4
E.	Describe how the reporting entity assesses the effectiveness of these actions	4
F.	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	4
G.	Any other information that the reporting entity, or the entity giving the statement, considers relevant	4



**Amit Chadha**  
**CEO & Managing Director**  
**L&T Technology Services Limited**

Please note this statement has not been approved by the AGD or published on the Online Register for Modern Slavery Statements for FY 2024-25.