
WHISTLEBLOWER POLICY

L&T Technology Services HR

Version 1.2 / February 2026



Whistleblower Policy

Record of Release

Version No.	Prepared by	Reviewed by	Authorized by	Release Date	Remarks
1.0	Ankita Gawankar	CFO	CHRO	October 2014	First Release
1.1	HR India	HR Head – India	CHRO	March 2025	Annual Review with no changes
1.2	HR Policy Team & Ethics Line	HR Head – India	CHRO	February 2026	Annual Review & Updates in 1) Escalation Matrix 2) Categorization of Complaints 3) Documentation and reporting 4) Responsibility of a Whistleblower 5) Role of an Investigation Team

1. Introduction

Good Governance is essential for building trust and maintaining effective internal controls. The Whistle-blower policy provides a transparent mechanism for employees and directors to report unethical conduct, wrongdoing fraud, or violations of the code of conduct without fear of retaliation. This helps protect the Company's integrity, reputation, and financial interests.

2. Scope

2.1 The Whistleblower Policy applies to all Directors, Employees, Contract Personnel, Retainers, and Interns of L&T Technology Services Limited, as well as the directors and employees of its subsidiary companies.

2.2 The following matters are out of scope of this policy as separate forums are available for these issues:

1. Personal grievances
2. Dissatisfaction with appraisals or rewards
3. Complaints related to service conditions
4. Company policies
5. Suggestions for improving operational efficiencies
6. Sexual harassment

3. Guidelines

- 3.1 LTTS is dedicated to upholding the highest standards of ethical, moral, and legal conduct in all business operations.
- 3.2 To support these standards, LTTS encourages employees with concerns about potential misconduct to come forward and share their concerns without fear of retaliation, punishment, or unfair treatment.
- 3.3 This policy is designed to offer employees a channel to report violations of regulatory or legal requirements, non-compliance with established systems and procedures, wrongdoing, misconduct, irregularities, weaknesses in governance, and similar issues.
- 3.4 An illustrative list of acts of wrongdoing is provided in Annexure 1; this list is not exhaustive; Acts of wrongdoing include, but are not limited to, those detailed in the Code of Conduct.

Whistleblower Policy

3.5 Categorisation of Complaints: Complaints received under this policy will be categorised into three distinct types, based on the outcome of the investigation process:

3.5.1 Allegations Substantiated

When a complaint is found to be genuine after a thorough investigation, appropriate actions will be initiated. The details and outcomes of such actions shall be reported to the Investigation Committee for further review and record-keeping.

3.5.2 Allegations Unsubstantiated

If the Investigation Committee determines that a complaint is unsubstantiated and finds credible evidence that the complaint was made with malicious intent, the matter will be escalated to the Ethics Line Team. The Ethics Line Team will assess whether any action needs to be taken against the complainant, in accordance with established procedures.

3.5.3 Allegations Could Not Be Proven

There may be cases where allegations cannot be proven due to insufficient evidence, incomplete information, or a significant lapse of time between the occurrence of the alleged incident and the submission of the complaint. In such instances, the complaint will be recorded as unproven.

4. Procedures

4.1 Structure of the Investigation Committee

4.1.1 The Ethics Line team shall appoint the Investigation team, subject to approval by the Chief Human Resources Officer (CHRO).

4.2 Report a Concern

4.2.1 Reports concerning suspected unethical or improper conduct should be objective and clearly articulated, offering sufficient detail to facilitate a comprehensive understanding of the matter. Wherever feasible, submissions should include specific information such as the nature of the alleged violation, the parties involved, supporting evidence, and relevant time frames to ensure an effective investigation.

4.2.2 While whistleblowers are not obligated to substantiate allegations, they are expected to provide adequate information to establish reasonable grounds for concern. The company encourages whistleblowers to disclose their identities, when possible, as this may aid in the prompt and thorough resolution of reported issues.

Whistleblower Policy

4.2.3 All disclosures intended for the Central Team may be submitted to the address or mail ID or phone number mentioned in Annexure 2

4.3 Investigation

4.3.1 Upon receipt of a Complaint or Disclosure, Ethics Line team will conduct a discreet preliminary inquiry prior to proceeding further. Based on the assessment, an investigation team will be assigned as appropriate.

4.3.2 The investigation team is expected to complete the investigation within 20 working days, subject to the complexity and nature of the case.

4.3.3 Should the investigation team determine that additional time is required for closure, it must inform the Ethics Line team accordingly.

4.3.4 Relevant individuals may be interviewed as part of the investigation process. These 4.3.5 interviews may be conducted in person, by telephone, virtually, via email, or through written explanations.

4.3.6 To uphold the integrity of the process and maintain accurate records, investigation discussions may be recorded. Such recordings will only be disclosed to authorities if proper approval is granted by the Central Team.

4.3.7 Decisions made by the Investigation Committee shall be considered final and binding for all parties involved.

4.3.8 If the Committee determines there is insufficient basis to proceed, it will decide to close the matter.

4.4 Outcomes

4.4.1 Should the investigation conclude that an illegal, improper, or unethical act has occurred, appropriate disciplinary or corrective action will be initiated according to the Policy on Discipline Management. Disciplinary measures may include, but are not limited to, wage freezes, suspension, recovery, termination of employment or contract, warnings, or other legal actions as deemed necessary.

4.4.2 The progress and results of the investigation, along with any resulting actions, may be communicated to the whistleblower as determined by the Investigation Committee.

4.4.3 The whistleblower will be required to sign a Case Closure Acknowledgement form to confirm satisfaction with the investigation process

4.5 Documentation and Reporting

All records related to the Complaint, including but not limited to the investigation report, details of corrective actions taken, and supporting evidence, will be retained by the Central Team for a minimum of five years from the date the Complaint is resolved.

4.6 Protection of Whistleblower & Confidentiality

- 4.6.1 The identity of the Whistleblower will be maintained in strict confidence to the greatest extent practicable.
- 4.6.2 However, disclosure may be required if an employee is mandated to do so through judicial proceedings or as prescribed by applicable laws.
- 4.6.3 Individuals who misuse the procedure by intentionally submitting false or malicious complaints will be subject to disciplinary action by the Company. In contrast, no such disciplinary measures will be taken against those who report concerns in good faith, with reasonable belief in their validity, even if subsequent investigations do not substantiate the allegations.
- 4.6.4 The Company strictly prohibits discrimination, harassment, victimization, or any form of unfair treatment towards whistleblowers. Whistleblowers are protected from retaliation for making disclosures under this policy. However, protection will not apply to individuals who acquire information through unlawful means.

4.7 Responsibility of a Whistleblower:

4.7.1 This policy is designed to surface genuine and significant concerns (as outlined in Annexure 1), rather than minor disclosures. Employees are expected to exercise their rights under this policy responsibly by adhering to the following guidelines:

- 1. Disclosures or complaints should provide complete and accurate information, supported by relevant documents or evidence whenever available.
- 2. Employees must promptly report any improper practices to the Ethics Line as soon as they become aware of them. Delays in reporting may result in loss of evidence and potential financial damage to the organization.
- 3. Employees are expected to cooperate fully with the Investigation Committee and ensure strict confidentiality throughout the process.

Whistleblower Policy

4.7.2 Whistleblowers must not undertake independent investigative activities nor make decisions regarding corrective or remedial actions. Participation in investigative processes is only permitted when formally requested to support the investigation.

4.8 Role of the Investigation Team

4.8.1 Once formed, the investigation team will hold internal meetings to define the scope, methodology, and direction for each case. The team will conduct structured interviews and consultations, as appropriate, with the complainant (when feasible), the subjects of the complaint, and any relevant stakeholders or witnesses.

4.8.2 All discussions, interviews, observations, and reviewed evidence will be thoroughly documented and incorporated into the investigation report. Minutes of meetings and supporting documentation will be maintained securely.

4.8.3 The investigation process will adhere to principles of natural justice, confidentiality, non-retaliation, and applicable internal policies, ensuring established timelines and a systematic approach are followed.

4.8.4 All members of the Investigation Team shall maintain confidentiality of the case assigned to them. Information related to the investigation – including allegations, evidence, statements, findings, and identities of the involved parties- must be accessed, used and disclosed strictly on a need-to-know basis and solely for the purpose of conducting the investigation.

4.9 Escalation Matrix

4.9.1 An Escalation Matrix has been established to address any issues that may arise during the investigation process. Should either the complainant or the subject perceives any form of retaliation, bias, or lack of impartiality in the proceedings, they are encouraged to escalate their concerns to the Head of the Ethics Line. Should further escalation be necessary, matters may then be referred to the CHRO.

4.9.2 The Head of the Ethics Line is available to provide clarification, address concerns, or review the investigation process as needed, with the aim of upholding fairness, ethical standards, and integrity throughout.

5. Policy Owner

L&T Technology Services HR - Policy Team would be responsible for maintaining the policy and carrying out subsequent changes/ modifications.

6. Implementation

This policy is effective from Oct 2014 & this revised Policy on Whistleblower dated February 2026 is effective from March 2026.

7. Review

L&T Technology Services reserves the right to revise, amend, abrogate and withdraw this policy at any time and in any manner without notice. Any change or revision will be available with L&T Technology Services HR - Policy Team and communicated appropriately.

ANNEXURES

ANNEXURE 1: ILLUSTRATIVE ACTS OF WRONGDOINGS

1. Fraudulent financial reporting
2. Misappropriation/misuse of Company's resources, like funds, supplies, or other assets
3. Pursuit of a benefit or advantage in violation of the Company's interest
4. Forgery or alteration of documents
5. Unauthorized alteration or manipulation of computer files
6. Kickbacks
7. Improper use of authority
8. Release of Proprietary Information
9. Authorizing or receiving compensation for hours not worked
10. Theft of Cash/Assets/ Services
11. Unauthorized Discounts/Approvals/Sanctions
12. Falsification/Destruction of Company Records
13. Fraudulent Insurance Claims
14. Disclosure of confidential information
15. Retaliation against a Whistleblower
16. Moonlighting
17. Conflict of Interest
18. Micro-aggression
19. Insider Trading

ANNEXURE 2: COORDINATES OF ETHICS LINE

1) Write To: Ethics Line

Integrity Matters, Unit 1211, CENTRUM
Plot No. C-3, S.G Barve Road,
Wagle Estate
Thane West - 400604
Maharashtra, India

(+91) 022 42152550

2) Report Incidents Online @ www.integritymatters.in / Report@integritymatters.in /

The whistleblower can access www.integritymatters.in by providing the access code LT00001 to report any concerns.

The Whistleblower can access the Audit Committee at Audit.Chairperson@Lts.com.

3) Call the following Toll-Free Numbers to register your complaint

- India: 1800-102-6969
- USA: (+1) 888-436-0393
- Poland: (+48) 800088123
- United Kingdom: (+44) 8083044704
- Germany: (+49) 80018017222
- Rest of the World: (+91) 9595-146-146