

Business Ethics, Anti-Corruption and Anti-Bribery Policy



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Overview

It is our company policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery and corruption.

Applicability

The applicability of this statement falls under purview of the [Global Policy Applicability Statement](#).

Purpose

This policy sets out our responsibilities, and of those working for us, in observing and upholding our position on business ethics, bribery and corruption. It also provides information and guidance to those working for us on how to recognize and deal with bribery and corruption issues.

Scope

This policy applies to all persons working for us or working for any group company or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

Business Ethics, Anti-Corruption and Anti-Bribery Policy

Policy statement

It is our company policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery and corruption.

We will uphold all applicable laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

About this policy

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can, depending on the relevant jurisdiction, be punished by imprisonment and/or a fine. As an employer, if we fail to prevent bribery, we can face an unlimited fine, exclusion from tendering for public contracts, breach of client contracts, damage to our reputation, etc. We therefore take our legal responsibilities in this regard very seriously.

What you must not do

It is not acceptable for you (or someone on your behalf) to:

1. give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
2. give or accept a gift or hospitality during any commercial negotiations or tender process if this could be perceived as intended or likely to influence the outcome;
3. accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
4. accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
5. offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of our Legal Department;
6. threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
7. engage in any other activity that might lead to a breach of this policy.

Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

1. **Facilitation payments**, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official).
2. **Kickbacks** are typically (secret) payments made to a person in a position of power or influence in return for a business favour or advantage.

You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with our Legal Department.

Gifts, hospitality and expenses

We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether the gift, hospitality or expense payment is reasonable and justifiable. The intention behind it should always be considered.

This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

1. establishing or maintaining good business relationships;
2. improving or maintaining our image or reputation; or
3. marketing or presenting our products and/or services effectively.

You are prohibited from accepting a gift from, or giving a gift to, a third party unless:

1. it is made with no intention of influencing a third party to obtain or retain business, or a business advantage, or to reward the provision or retention of business or a business advantage or in explicit or implicit exchange for favours or benefits;
 - a. it is given in our name, not in your name;
 - b. it does not include cash or a cash equivalent (such as gift certificates or vouchers);
 - c. it is appropriate in the circumstances, taking account of the reason for the gift, its timing, value, and customary practices in the location where the gift is given or received (such as religious holidays or Chinese New Year);

- d. it does not cause, or appear to cause a conflict of interest;
 - e. it is given openly, not secretly;
 - f. it complies with any applicable local law, and
 - g. our Legal Department confirms it is acceptable.
2. Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.
 3. Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.
 4. We do not make contributions to political parties.
 5. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of a Group Director or someone having been delegated this authority by the Board of LTG.

Suppliers, Contractors and Other Business Relationships

We may be liable for the acts of people and parties who act on its behalf. These include agents, contractors and/or suppliers (collectively, "Suppliers"). As such, we are committed to promoting compliance with this policy by all Suppliers acting for or on behalf of us.

1. Arrangements with any Supplier should be subject to clear contractual terms and may include specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption, if deemed appropriate. We must not engage with any Supplier who it knows or reasonably suspects of engaging in Bribery.
2. Appropriate due diligence will be undertaken prior to any third parties being engaged by us. Judgement will be made on a case by case basis as to what the appropriate level of due diligence should be, as it will depend on the individual circumstances of the third party arrangements. We will also undertake appropriate due diligence to identify the risk of corruption before entering into customer, supply, partner and other business relationships, including the acquisition of another company or business.

If you have any concerns that an arrangement with a Supplier is not in accordance with this policy, you should consult with the Legal Department.

Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

1. You must declare and keep a written record of all material hospitality or gifts given or received, which will be subject to managerial review.
2. You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
3. All accounts, invoices, and other records relating to dealings with third parties including suppliers and clients should be prepared with accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

Your responsibilities

Please ensure that you read, understand and comply with this policy. This should be read in conjunction with any provisions in your employment contract and the applicable Staff Handbook which relate to ethics and conduct of Company staff.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Please ensure you notify our Legal Department as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.

How to raise a concern

You are encouraged to raise concerns with our Legal Department about any issue or suspicion of bribery or corruption at the earliest possible stage.

1. If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify our Legal Department as soon as possible.
2. If you are unsure about whether a particular act constitutes bribery or corruption, please raise it with our Legal Department.

Protection

Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform our Chief Operating Officer, our Legal Department and/or our HR Department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure.

Training and communication

Training on this policy will form part of the induction process for all individuals who work for us, and regular training will be provided as necessary. Guidance and advice provided during such training should be followed as well as this policy.

A copy of this policy, where appropriate, should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Breaches of this policy

Given the vital importance of this policy to our company, any employee who breaches this policy will face disciplinary action, which depending on the nature of the breach could result in dismissal for misconduct or gross misconduct.

We may also terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

Document control

i This policy is only controlled in its live, digital format. Any other format or export of this policy is an uncontrolled version of this document

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Author(s)	Legal	
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Version History

Date	Author(s)	Version	Changes
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Sep 25, 2025	Art Machado Angelina Kilmer Paul Gordon	1.4	Minor updates, no material change
Feb 5, 2025	Wasim Khan	1.3	Minor updates, no material change
Nov 1, 2024	Wasim Khan	1.2	Updates to the Gifts, hospitality and expenses section. New Supplier section added. Minor updates elsewhere.