

Code of Conduct



Version Number	2.0
Last Approved	Feb 16, 2026
Classification	PUBLIC

Overview

This policy outlines the code of conduct at LTG and addresses potential variations based on geographical differences.

Applicability

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

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 and interns.

Code of Conduct

1 - Policy Compliance

1. This document consolidates certain requirements regarding employee/personnel conduct from pertinent Company policies.
2. Employees, contractors, and any other applicable personnel are required to read, understand and comply with all Company policies to the extent applicable.
3. This includes staying updated with the current versions of Company policies that are communicated and available to those within scope, including those policies made available on LTG's centralised [Policy Register page](#).

2 - Business Ethics, Bribery and Corruption

1. This section outlines the Company's expectations regarding business ethics, bribery and corruption.
2. 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.
3. The Company also requires all employees to maintain professionalism at all times when representing the Company, whether in the workplace, at client sites, tradeshows, Company-sponsored events, when working from home, or in any other business-related context. Employees must also respect the rights of fellow employees and third parties,

ensuring that their actions are free from discrimination, libel, slander, or harassment.

4. Regarding bribery and corruption matters, all employees, contractors, and personnel engaged by the Company must adhere to the following:
 - a. **Facilitation payments and kickbacks** - We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. 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.
 - b. **Hospitality and expenses** - reasonable and appropriate hospitality or entertainment given to or received from third parties is allowed for the purposes of establishing/maintaining good business relationships, improving/maintaining reputation, and/or marketing or presenting our products and/or services effectively.
 - c. **Gifts** - Accepting or giving gifts is prohibited unless: (i) it doesn't influence business decisions or reward business advantages; (ii) it is given in our name, not your name; (iii) it doesn't include cash or equivalents; (iv) it is appropriate considering the context, reason, timing, value, and local customs; (v) it doesn't cause conflicts of interest; (vi) it is given openly; (vii) it complies with local laws; and (viii) our Legal Department approves it.
 - d. **Donations** - We do not make contributions to political parties. 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.

3 - Conflicts of Interest

1. Employees owe a duty to Company to advance its legitimate business interests and avoid conflicts. This includes: (a) not diverting business opportunities for personal gain, (b) not using Company property or information for personal benefit, and (c) not competing with the Company.
2. Employees must perform their duties without being influenced or impaired by external activities, interests, or relationships. A conflict of interest occurs when an employee's loyalty to the Company is compromised by outside benefits or influences. Employees should immediately report any conflicts or potential conflicts to their supervisors and the Legal Department for appropriate action.

4 - Compliance with Laws and Regulations

1. All employees must comply with applicable laws and regulations relevant to our business operations. This includes adhering to Company policies designed to ensure legal compliance.
2. Non-compliance can result in serious consequences for both individuals and the Company. Employees are encouraged to remain vigilant and proactive in upholding these standards. Any questions or concerns regarding compliance should be promptly directed to the Legal Department to ensure our operations meet legal requirements and reflect our commitment to ethical conduct.

5 - Confidentiality and Data Privacy

1. Confidentiality and data privacy are critical to our day-to-day operations. All employees are required to protect sensitive information and maintain confidentiality at all times. This includes being mindful not to disclose any proprietary information, trade secrets, or personal data to unauthorized parties, both within and outside the Company. Employees are expected to follow all Company policies, protocols and guidelines to ensure that confidential information (including without limitation, personal information) is handled with the appropriate level of

security and care, in line with our legal, statutory, and commercial requirements.

2. Any breaches or potential security threats should be reported immediately to the IT Department to mitigate risks and prevent data loss. Employees should remain vigilant and proactive in safeguarding the Company's digital assets and personal information entrusted to us by clients and partners, in adherence to our legal, statutory, and commercial obligations.

6 - Proper Accounting and Record Keeping

Employees involved in business transactions and financial activities are expected to maintain accurate and timely records. This ensures transparency, accountability, and compliance with legal and regulatory requirements. Applicable employees should follow Company's accounting principles and other appropriate requirements. Any discrepancies or irregularities must be reported to Finance immediately.

7 - Conduct Outside Working Hours and Outside Engagement

1. While the Company has no intention to intrude upon your activities or interests outside of work, we do expect that no employee will be engaged in any activity outside of work which might result in adverse publicity to the business, or which would cause the Company to question your integrity or prevent you from performing your duties/responsibilities to our satisfaction.
2. Employees may seek part-time jobs or engage in other work outside office hours. Such activities do not inherently violate this policy. However, employees must avoid any external employment, or business endeavors that conflict with the Company's interests, negatively impact job performance, or risk harming the Company's reputation. Furthermore, employees are prohibited from using Company assets, information, or equipment for external work. Prior to undertaking additional employment, employees must disclose their intentions to their department and Human Resources to ensure that the proposed activity does not present a conflict of interest and adheres to Company policies.

8 - Dress code

1. The Company provides a casual yet professional work environment for its employees, however, there will be occasions where a more professional appearance is required.
2. All employees are expected to dress in a manner consistent with good hygiene, safety, tidiness and good taste.
3. Due to the client-oriented nature of the business, you are expected to project an image which reflects a professional approach to our customers, visitors, and coworkers. You will be required to adhere to client dress codes as applicable.

9 - Use of Company Assets and Properties

1. Employees are entrusted with Company equipment, assets, and documents, and are expected to use them solely for legitimate business purposes.

2. Proper care and maintenance of these assets are crucial. Any loss or damage due to negligence may result in the employee being held responsible for replacement costs and/or face disciplinary action. Employees must adhere to the Company's IT and security policies to ensure the protection and integrity of Company assets.
3. It is essential to safeguard all Company property, including physical assets and digital information. Unauthorized use of Company assets or information is strictly prohibited, and such actions may result in severe consequences as outlined in the Company's IT and security policies.
4. Upon termination or request, employees must promptly return all Company property in their possession.

10 - Public and media communications

1. It is the policy of the Company to conduct proper relations with external third parties, including, but not limited to, analysts, consultants, trade publications, and/or news media outlets to advance the Company's business goals.
2. You may not contact or communicate with any members of the press or media, or anyone connected with these industries, on behalf of the Company unless prior written permission by senior management has been obtained.
3. You are not permitted to publish letters, articles or otherwise purporting to represent the Company unless you have obtained prior permission in writing from senior management.

11 - Violations

1. Violations of this Code of Conduct, and any other policies of the Company, will be addressed promptly by the Company. Employees who conceal misconduct, falsify records, knowingly make a false report, fail to report a suspected violation of this or any policy, or fail to comply with this or any policy, will be subject to disciplinary action up to and including termination of employment. In the event of a violation or misconduct by an employee, the Company will invoke the disciplinary procedure outlined in the employee's regional handbook at the stage most appropriate, as determined by the Company. In the event of gross misconduct or gross negligence by an employee, the Company reserves the right to summarily dismiss the employee without notice.
2. The below lists examples of misconduct, however this does not represent an exhaustive list:
 - a. Failure to comply with the Company's policies and procedures and the terms of employment
 - b. Unauthorised lateness and poor timekeeping
 - c. Unauthorised absence and/or unacceptable levels of absence from work
 - d. Rude, disruptive or otherwise unprofessional behaviour
 - e. Violation of safety rules
 - f. Misuse of the Company's and/or its clients' facilities, e.g. equipment, vehicles, internet, email and computer facilities
3. The list below contains examples of gross misconduct; however this does not represent an exhaustive list:
 - a. Theft, fraud, providing false or misleading information or any act of deceit or dishonesty
 - b. Physical violence, fighting or assault on another person, or the threat of violence to any other person

- c. Bullying or verbal abuse
- d. Using or being under the influence of drugs or alcohol during work hours
- e. A serious act of insubordination
- f. Possession of firearms or any other weapons on Company property
- g. Unlawful discrimination, harassment or victimisation on the grounds of race, religion or belief, colour, sex, age, national origin, disability or sexual orientation or any other ground

12 - Reporting and Seeking Help

1. Each employee is responsible for ensuring that their conduct and the conduct of anyone reporting to them fully comply with the policies governing the Company’s business dealings. All employees have a duty to report any known or suspected violations of this Code of Conduct. Employees may report such violations to the Legal Department.
2. This document is not a comprehensive rulebook and cannot address all situations that an employee may face. When in doubt, you are encouraged to seek help. An employee should contact his/her manager/supervisor for advice first. If the manager/supervisor is unable to resolve the problem, the employee should contact the Legal Department, either via the Legal Service Desk, or directly.

13 - Retaliation

The Company prohibits any form of retaliation against an employee, who, in good faith, seeks help or reports known or suspected violations of this Code of Conduct. Any reprisal or retaliation against an employee because the employee in good faith sought help or filed a report will be subject to disciplinary actions.

14 - Waivers and Amendments

1. No waiver of any provisions of this Code of Conduct for the benefit of an executive officer shall be effective unless approved by the Board of Directors.
2. Any waivers of any provisions of these Standards for other employees may be made by the Legal Department.

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

Document Owner	Legal	
Author(s)	Paul Gordon	
Required Approver(s) and Approval Date	GRC	Feb 16, 2026
Review cycle	Annual	
Next review date	Feb 15, 2027	

Version History

Date	Author(s)	Version	Changes
Feb 16, 2026	Paul Gordon	2.0	Annual review
Feb 17, 2025	Claire Walsh	1.0	Approval
Jan 2, 2025	Wasim Khan	1.0	Revisions and Legal Review
Oct 7, 2024	Paul Gordon	1.0	Initial Draft