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## **Company Business Ethics and Responsible Conduct** **Policy Statement**

### **HONESTY**

LFD is committed to the highest standards of ethical conduct in all that it does. The Company complies with all applicable legal and regulatory requirements governing business relationships and international trade, including relevant export and import control regulations. LFD believes that honesty and integrity engender trust and it conducts its business in accordance with all the applicable laws and regulations of the countries in which it does business and requires that its employees, agents and advisers also comply with such laws.

### **PROHIBITION OF BRIBERY AND EXTORTION**

LFD does not offer, promise, give, demand or accept bribes or other unethical inducements, including extortion, in order to obtain, retain or give business or other advantage and takes all reasonable measures within its power to ensure that its employees, advisers and agents follow the same practice.

### **COMBATING SLAVERY AND HUMAN TRAFFICKING**

LFD does not engage in any form of human trafficking or use forced labour in the performance of any of its contracts and takes all reasonable measures within its power to ensure that its suppliers, employees, advisers and agents follow the same practice.

### **COMPETITION**

LFD competes fairly and vigorously in its market sector and it does not engage in, nor is it a party to, any agreements, business practices or conduct that, as a matter of law, are anti-competitive.

### **INTEGRITY IN BUSINESS BEHAVIOUR**

LFD expects its employees to act with integrity at all times. LFD employees who have access to privileged information must not use it to achieve personal gain for themselves or others and no employee shall engage in personal activities or pursue financial or business interests which might give rise to, or give the appearance of, conflicts of interest with LFD, or which might compromise their ability to meet the responsibilities of their job.

### **CUSTOMER AND SUPPLIER RELATIONSHIPS**

LFD seeks to provide its customers with products and services which meet or exceed their requirement, to respond quickly to changing customer demand and to seek to continuously improve product quality, value and delivery times.

LFD believes in working in partnership with suppliers in order to meet its customers' expectations and ensure quality, value and timeliness of delivery and payment to suppliers will be made promptly within the agreed terms of business

### **EMPLOYEES**

LFD recruits, selects and promotes employees on the basis of their qualifications, skills, aptitude, attitude and treats all its employees with respect and dignity. Harassment or

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bullying is unacceptable. LFD complies with all relevant anti-discrimination legislation and regulations in the countries in which it does business in respect of its employment related decisions.

## **HEALTH AND SAFETY**

LFD is committed to conducting all its activities in a manner which achieves the highest practicable standards of health and safety.

## **ENVIRONMENT**

LFD is committed to a proactive policy on environmental issues. Compliance with legislation is a primary goal. A priority objective is the reduction and management of waste through better utilization of raw materials, energy resources and water supplies, as well as minimizing waste at source, and employing re-use or recycling techniques.

Employees will be educated and trained to carry out tasks in an environmentally responsible manner and are expected to act in accordance with the policy and training provided.

## **HUMAN RIGHTS**

LFD adheres to all relevant government guidelines designed to ensure that products are not incorporated into weapons or other equipment used for the purposes of terrorism, internal repression or abuse of human rights.

LFD seeks to uphold all internationally recognized human rights wherever its operations are based.

## **REPORTING AND INTERNAL CONTROLS**


LFD records all business transactions accurately, prudently and transparently in compliance with its accounting standards and utilizes appropriate internal controls to ensure that it is managed effectively and that the reported results are accurate.

## **APPLICATION AND COMPLIANCE**

The LFD code of ethics applies throughout the Company and to all its employees worldwide. Disregard or breach of the code by an employee may result in disciplinary action.

LFD seeks, wherever possible, to ensure that any joint venture in which it participates complies with the LFD code of ethics or has in place a similar code of its own.

LFD expects employees to bring any suspected or actual breach of the code promptly to management attention. Any employee making such information known to management through the appropriate procedures will not face any adverse or unfavourable treatment for such disclosure.

Signed: 

L. Fleck  
Managing Director