

ANTI-BRIBERY AND ANTI-CORRUPTION

LUFTER is committed to conduct its businesses and operations with high ethical standards and integrity. The Company adopts a zero-tolerance policy against all forms of Bribery and Corruption by its Directors, Management, Employees and any individual/organization acting for the Company and on its behalf and takes a strong stance against such acts.

This Shall mean



Comply fully with the applicable laws and regulatory requirements on anti-bribery and anti-corruption



Deliver appropriate training to employees on how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business



Assess the risks and impacts in our operations and activities; provide mitigation to control the risks



All employees are encouraged to report any suspicious activities



All reports will be taken seriously and treated with respect and confidence. No one will be victimized for making such a complaint.

LUFTER shall display this policy, ensuring the message is communicated to everyone within the organization.