



LUCKY TEX ANTI BRIBERY & ANTI CORRUPTION POLICY

Policy Statement

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

Through this policy, which is fully endorsed and supported by the Lucky Tex CEO, we set out our responsibilities in observing and upholding our position on anti-bribery and anti-corruption; and to provide information and guidance to everyone associated with us, including our employees and interested parties, on how to deal with any bribery or corruption issues.

Who is covered by the policy?

This policy applies to Lucky Tex employees globally, and interested parties in contact with Lucky Tex during the course of any business matter, either working for or on behalf of the Lucky Tex.

Basics

Any person or company commit a criminal offence punishable as per Law and if they are found guilty of either giving or receiving a bribe or act of corruption. This includes taking part in any form of corruption or bribery involving public officials or private sector individuals.

Principles

This Policy requires that employees and interested parties to comply as follows:

- Do not offer, promise, authorize or make any payment or transfer of value, including gift, hospitality or other advantage to anybody (including Public Officials) or organization. Kickbacks and illicit payments including facilitation payments, for the purpose of obtaining or retaining business or any other unfair advantage are bribery.
- Do not accept, receive, request any kind of gift, money, anything of value, hospitality or any other unfair advantage or an improper purpose or performance of an activity. The act of bribery does not have to include money.
- Offering or promising to give something to influence someone's behavior or actions is bribery. It is also bribery if done indirectly via any third party, including sponsors, customers or suppliers.
- All interested parties are required to use their best efforts to implement this policy and where applicable their own policies and procedures against bribery and corruption.
- All offers of bribes, requests for bribes or facilitation payments, including those not accepted, should be reported as soon as possible. In the first instance, please send an email to the following address for reporting any violations:

Email: obaidm@luckytexonline.com

Ph#: (92-21) 32569791-5

Interested Parties also are given a list of phone numbers to use if they wish to report an incident to Sr. HR & Compliance Manager for Lucky Tex for any anti-Bribery/corruption issues. This statement is a summary of some of the key elements of our anti-bribery and anti-corruption policy.

Salman Tabb
CEO

Date Approved/Reviewed: 01-01-2022