



LUCKY TEX

ANTI BRIBERY & ANTI CORRUPTION & ANTITRUST 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 & antitrust. 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 menaces of bribery & corruption & antitrust.

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; 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 or antitrust 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.

Lucky Tex strictly abide by all clauses under Competition Act Pakistan 2002 to 2017 in letter and spirit, few clauses are highlighted as follows: Chapter II: Prohibition of Abuse of Dominant Position, Certain Agreements, Deceptive Marketing Practices & Approval of Mergers:

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 or antitrust. 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.	Agreements with competitors about pricing, customers, market allocation and boycotts are prohibited.
	Agreements with competitors concerning the wages or benefits provided to employees or other personnel are prohibited.
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.	Agreements with competitors to allocate customers or to serve or not serve certain customers are strictly prohibited and should not be discussed.
	It is unlawful to agree with competitors to allocate product markets, market shares, business opportunities, territories or customers.
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.	Prohibits an abuse of dominant position, maintained or continued if it consists of practices which prevent, restrict, reduce, or distort competition in the market.
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.	Prohibition: No undertaking or association of undertaking shall enter into any agreement or, in the case of any association of undertakings, shall make a decision in respect of the production, supply, distribution, acquisition or control of goods or the provision of services which have the object or effect of preventing, restricting or reducing competition within market.
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:	Customer Prices dictating the prices at which the customer may sell is prohibited.
	Tying Agreements with Customer where a seller conditions the sale of one of its products upon the buyer's agreement to buy another product from the seller is prohibited.

Mr. Obaid Mohsin Alvi (Sr. Manager HR & Compliance)

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 Bribery/corruption/antitrust issues.

Salman Tabba
CEO

Date Approved/Reviewed: 01-01-2024