

THE LUX COLLECTIVE

PURCHASING POLICY

The Lux Collective (TLC) conducts all its purchasing activities in accordance with the relevant legislations. All its purchases for goods & services are to be in accordance with the Purchasing Policy and the associated standard operating procedures (**TLC Purchasing Policy – Annex 1: Part V of TLC Code of Ethics**).

This policy has been prepared to ensure the achievement of reduction of the environmental, social and economic impacts on the destinations in which TLC is operating. TLC strives to achieve environmentally preferred purchases. We also ensure that local products are purchased and seek for local service providers before going towards international providers wherever possible.

We have as criteria to evaluate factors like cost, quality, duration, and extent to which the goods or services meet the specified requirements, as well as social and environmental responsibilities. Wherever possible, we inform our suppliers of the preference for environmentally preferred products & services which meet sustainability standards (E.g. ISO certified paper) and also which are Fair Trade Certified. We also ensure that wherever possible, we utilise recycled products. We strive to look for products with limited packaging and give preference to buying in bulk and waste minimisation.

In line with our Good Corporate Governance practice, we take into account the Risk Management Principles and ensure that the goods and services being purchased are developed using safe design approach to minimise the risk of failure and harm to the customers.

Innovation and creativity being part of our core values, we also take into account that the products and services are in line with our objective to be the leaders in improved industry performance, business relationships and resource optimisation methods.



Vishnee Sowamber
Group Sustainability & Corporate Social Responsibility Manager

Date: 01.03.19

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TLC Purchasing Policy - Annex 1 Part V company Code of Ethics and Conduct



GIVING AND RECEIVING GIFTS

Make sure that you do not ask for any gift or favour from anyone if that gift or favour has an influence on the way you do your job.

You may however accept gifts in so far as they are of modest value, they are given in conjunction with the end-of-year celebration or any other special occasion and they consist of marketing items distributed to a wide business audience. The concept of "modest value" may be relative but as an indication, will fall within the scope of a simple calculator, diary or calendar. The granting or receipt of items falling outside the concept of "modest value" will have to be put into a pool and shared equitably to all the employees within the department/section.

Do not offer any gift or favour to anyone in order to influence that person in the way that he/she does the job and never offer any payment to anyone, in order to exert any influence on the way that person does business. Be aware that while moderate business entertaining is acceptable, you must be guarded against hospitality that appears to be aimed at influencing the way someone does his/her job.

You should turn down invitations to meals or entertainment that are excessive in nature or frequency, so as to avoid loss of objectivity when conducting the Company's business. You must always strictly abide by the entertainment policy of the Company, which is guided by the highest ethical standards.



DONNER ET RECEVOIR DES CADEAUX

Assurez-vous de ne pas demander de cadeau ou de faveur de quiconque si ce cadeau ou cette faveur a une influence sur la façon dont vous faites votre travail.

Vous pouvez cependant accepter des cadeaux dans la mesure où ils sont d'une valeur modeste, ils sont donnés dans le contexte des célébrations de fin d'année ou toute autre occasion spéciale, et si ce sont des objets promotionnels distribués à un grand public de professionnels. La notion de valeur « modeste » peut être relative, mais à titre indicatif, elle tombera dans la catégorie d'une calculatrice, agenda ou un calendrier simple. L'octroi ou la réception des articles qui ne relèvent pas de la notion de valeur « modeste » devront être mis dans une cagnotte commune et partagée de façon équitable à tous les Team Members au sein du département ou de la section.

N'offrez pas de cadeau ou de faveur à quiconque en vue d'influencer cette personne dans la façon dont il / elle fait le travail. N'offrez jamais des sommes d'argent à toute personne, dans le but d'exercer une influence sur la façon dont cette personne fait des affaires.

Soyez conscient que des réceptions d'affaires modestes sont acceptables. Cependant, vous devez vous méfier des réceptions qui semblent avoir pour objectif d'influencer le travail d'une personne.

Vous devez refuser des invitations à des repas ou des divertissements qui sont excessifs dans la nature ou la fréquence, de manière à éviter toute perte d'objectivité dans la conduite des affaires de la Société. Vous devez toujours respecter strictement la politique de divertissement de la Société, qui est guidée par les plus hautes normes éthiques.