



LTES

CODE OF CONDUCT



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A. LABOR

LTES is committed to upholding the human rights of employees, and to treat them with dignity and respect as understood by the international community. This applies to all employees including temporary, migrant, student, contract, direct employees, and any other type of employees.

1) Freely Chosen Employment

LTES does not apply any type of forced labour whatsoever. All work is voluntary and employees are free to terminate their employment at any time.

2) Child Labour

LTES does not use child labour in any of its activities. The term “child” refers to any person under the age of 16 or under the age for completing compulsory education. LTES supports legitimate workplace apprenticeship programs, which comply with all laws and regulations applicable to such programs.

3) Working Hours

LTES does not exceed the maximum hours set by law. A workweek does not exceed 60 hours per week, including overtime, except in emergency or unusual situations, with employees' consent. Employees are allowed at least one day off per seven-day week.

4) Wages and Benefits

Compensation paid to employees by LTES complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

5) Humane Treatment

LTES does not allow or tolerate any harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees. Any such behaviour by employees will be penalised by dismissal.

6) Non-Discrimination

LTES does not discriminate based on race, colour, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training.

7) Freedom of Association

LTES respects the rights of employees to associate freely, join or not join labour unions, seek representation, and join workers' councils in accordance with applicable laws. Employees are able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.



B. HEALTH and SAFETY

LTES is committed to minimizing the incidence of work-related injury and illness, and maintaining a safe and healthy work environment. LTES welcomes ongoing employee input related to identifying and solving health and safety issues in the workplace.

1) Occupational Safety

LTES employees are not exposed to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards). All such hazards are controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures, and ongoing safety training.

2) Emergency Preparedness

LTES minimizes impact of potential emergency situations and events through emergency plans and procedures including emergency reporting, employee notification and evacuation procedures, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

3) Occupational Injury and Illness

No occupational injury and illness cases are expected to occur at LTES working environment. Provisions to prevent and manage occupational injury and illness include encouragement of injury or illness reporting, first aid medical equipment, elimination of potential causes.

4) Industrial Hygiene

LTES employees are not exposed to any chemical, biological and physical agents.

5) Physically Demanding Work

LTES employees are not exposed to hazards of physically demanding tasks, such as manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks.

6) Machine Safeguarding

LTES does not maintain machinery that may cause potential safety hazards. Typical electrical equipment is properly maintained.

7) Sanitation, Food, and Housing

LTES employees are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.



C. ENVIRONMENTAL

LTES is committed to minimizing adverse effects on the community, environment and natural resources.

- 1) **Environmental Permits and Reporting**
LTES has obtained all required environmental permits, approvals and registrations.
- 2) **Pollution Prevention and Resource Reduction**
LTES maintains a policy of reduction and/or elimination of waste of all types, including water and energy at the source, and practices such as maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
- 3) **Hazardous Substances**
Any chemical substances at the workplace, such as cleaning materials, are identified and managed to ensure safe handling, movement, storage, use, recycling or reuse and disposal.
- 4) **Wastewater and Solid Waste**
No wastewater or solid waste is generated from LTES operations. Wastewater from sanitation facilities is controlled and treated as required by applicable laws.
- 5) **Air Emissions**
No air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products are generated from LTES operations.
- 6) **Product Content Restrictions**
LTES adheres to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labelling for recycling and disposal.



D. ETHICS

LTES is committed to upholding the highest standards of ethics including:

- 1) **Business Integrity**
LTES upholds the highest standards of integrity in all business interactions. We apply a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings are transparently performed and accurately reflected on our business books and records. Compliance with anti-corruption laws is supported by appropriate enforcement measures.
- 2) **No Improper Advantage**
No bribes or other means of obtaining undue or improper advantage are offered or accepted.
- 3) **Disclosure of Information**
Information regarding business activities, structure, financial situation and performance is disclosed in accordance with applicable regulations and prevailing industry practices.
- 4) **Intellectual Property**
Intellectual property rights are respected. Transfer of technology and know-how is done in a manner that protects intellectual property rights.
- 5) **Fair Business, Advertising and Competition**
LTES upholds the highest standards of fair business, advertising and competition. Customer information is safeguarded by appropriate measures.
- 6) **Protection of Identity**
LTES is a safe and confidential environment for employees to make whistleblower reports.
- 7) **Responsible Sourcing of Minerals**
No minerals are sourced by LTES.
- 8) **Privacy**
LTES is committed to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees. LTES complies with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
- 9) **Non-Retaliation**
LTES personnel is encouraged to raise any concerns without fear of retaliation.

E. MANAGEMENT SYSTEM

LTES management system ensures:

- (a) compliance with applicable laws, regulations and customer requirements
- (b) conformance with this Code; and
- (c) identification and mitigation of operational risks related to this Code. It also facilitates continual improvement.

1) Company Commitment

LTES is committed to compliance and continual improvement of its social and environmental responsibility.

2) Management Accountability and Responsibility

LTES senior management is responsible for ensuring implementation of the management systems and associated programs.

3) Legal and Customer Requirements

LTES senior management monitors applicable laws, regulations and customer requirements, and communicates those requirements to personnel, including the requirements of this Code.

4) Risk Assessment and Risk Management

LTES senior management identifies and controls the environmental, health and safety and labour practice and ethics risks associated with our operations.

5) Improvement Objectives

LTES social and environmental performance objectives and implementation plans include:

- Enhance company's environmental policy
- Enhance the company's social performance assessment tools and staff training on social performance management
- Use performance assessment tools to periodically assess performance vs objectives.

6) Training

LTES implements regular internal programs for training personnel to implement company's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

7) Communication

LTES senior management communicates clear and accurate information about LTES practices, expectations and performance to employees, suppliers and customers.

8) Worker Feedback and Participation

LTES collects regular feedback from employees on practices and conditions covered by this Code with the aim to foster continuous improvement.

9) Audits and Assessments

LTES performs periodic evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

10) Corrective Action Process

Any deficiencies identified by internal or external assessments, inspections, investigations and reviews are addressed timely and appropriate corrective actions are defined, documented, and monitored.

11) Documentation and Records

LTES maintains appropriate documentation and records to ensure regulatory compliance and



conformity to company requirements along with appropriate confidentiality to protect privacy.

12) Supplier Responsibility

The Code is communicated to LTES suppliers and supplier compliance to the Code is monitored.



REFERENCES

EICC Code of Conduct v4.0

ILO Code of Practice in Safety and Health

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

ILO International Labor Standards

www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm

ISO 14001 www.iso.org

Universal Declaration of Human Rights www.un.org/Overview/rights.html

United Nations Convention Against Corruption

www.unodc.org/unodc/en/crime_convention_corruption.html

United Nations Global Compact www.unglobalcompact.org

SA 8000 www.cepaa.org/

SAI www.sa-intl.org

IBM's Requirements for Suppliers on Corporate Responsibility and Environmental Management, Release Version 3.0; Release Date 24 February, 2013