

ANTI-BRIBERY AND CORRUPTION POLICY

Gifts and invitations

A gift is any item of value, e.g. discounts, loans, favourable terms on any product or service, services, prizes, transportation, use of another company's vehicles, use of vacation facilities, stocks or other securities, participation in stock offerings, home improvements, tickets, and gift certificates.

The acceptance of kickbacks or any form of gratuity for services rendered or possible orders to be awarded are not permitted under any circumstances and all cases of attempted inducement or offers of business-related benefits will immediately be disclosed to your director.

Monetary Gifts/Commission

Seasonal or congratulatory gifts as well as the usual gifts for promotional purposes should only be accepted if offered on the relevant occasions and there is no reason to doubt the bona fides of the donor. Gifts of any other nature should generally be regarded as unacceptable and be politely declined. In parts of the world where gift-giving is a common practice and declining a gift could reflect badly on Lumotech, it may be appropriate to accept a gift, even if it is relatively expensive –as long as doing so would not violate any laws or discredit Lumotech in any way, the gift is unsolicited and not offered to influence your judgement. Such gifts must be reported to your manager as well as declared to Security who will record such gift in a "gift register".

Invitations

Invitations from customers or suppliers as a courtesy extended during the normal course of business may be accepted, provided this is not being offered to influence your business decisions and should be in the interest of Lumotech. Invitations for inland trips where expenses are paid partially or fully by the host should be declined and may only be accepted with the prior approval by the relevant director. The acceptance of invitations for trips outside the countries boundaries is totally prohibited unless specifically authorized by the Managing Director.

Favours/Bribes

Lumotech does not buy business – we obtain it from the merits of our products, quality, services and people. An employee may never accept any offer, which may constitute bribery or offer bribes in any form.

General

Apply sound discretion when considering the acceptance of gifts/invitations, because business ethics are of the greatest importance to our company and if in any doubt consult with the Human Resources Director for guidance and clarity.

Whistleblowing

Whistleblowing refers to the discovery of an irregularity by an employee and the employee makes a disclosure of such irregularity by reporting the irregularity to either Lumotech Management, Metair Investment or Tip-off's Anonymous. The employee discovering the irregularity may decide to make discovery protected or not.

If the employee prefers to make such discovery anonymously, the employee may use the Metair Investment whistleblowing hotline. Contact details of the hotline is displayed on all notice boards, and covered during induction training. The current hotline details are as follows: (Free call 0800 204 839), (E-mail metair@tip-offs.com), (Free fax 0800 00 77 88), (Free post KZN 138 Umhlanga Rocks, 432), (Website www.tip-offs.com). Where an employee feels comfortable in making an unprotected disclosure the irregularity can either be reported to the Human Resources Director or the Managing Director. Any such discovery will be handled with the utmost sensitivity. Lumotech views any whistleblowing as a basic human right and as such will take all reasonable steps to protect the interest of such employee against victimisation, discrimination and possible prosecution.

In an effort to encourage employees to report any unacceptable behaviour/ irregularities, the MD may reward / recognise the whistle-blower on the successful finalisation of a case.

I, the undersigned am totally committed to this policy and will ensure that it is effectively promoted and communicated to all Lumotech employees.



Jaco du Plessis

Managing Director



Date