LASCO Manufacturing Limited

Fraud & Ethics Policy

LASCO MANUFACTURING LIMITED					
Policy	FRAUD AND ETHICS POLICY				
Policy#	LML Policy#: LML/2015- FD-1	Version#	002	Responsible Department	FINANCE
Approved by:	Managing Director	Approval Date*	2016 March 9	Revised Date:	2020 May 6 2021 October
Approved by:	Board of Directors	Approval Date:	2026 July 30	Revised Date:	

1. Purpose

1.1 LASCO Manufacturing Limited is committed to conducting business with the highest standards of integrity, transparency, and ethical behaviour.

1.2 This Fraud & Ethics Policy establishes a consistent Company-wide framework to prevent, detect, investigate, and respond to fraud, corruption, and unethical conduct across all operations of LASCO Manufacturing Limited.

2. Scope

2.1 This policy applies to all directors, officers, and employees of the Company.

2.2 This policy also applies to temporary staff, interns, consultants, contractors, suppliers, service providers, agents, distributors, customers, and any third parties acting on behalf of or doing business with the Company ("Covered Persons").

2.3 All investigations shall be conducted without regard to position, seniority, length of service, or relationship to the Company.

3. Ownership, Oversight and Governance

3.1 This Policy is issued under the authority of, and approved by, the Board of Directors of LASCO Manufacturing Limited.

3.2 The Board of Directors retains ultimate responsibility for the ownership, oversight, interpretation, and effectiveness of this Policy.

3.3 Oversight of matters arising under this Policy shall ordinarily fall within the remit of the Board Committee responsible for Corporate Governance or such other Committee as the Board may designate.

3.4 Management, Finance and the Human Resources function are responsible for the day-to-day administration of this Policy, under the direction and oversight of the Board of Directors or the appropriate Board Committee.

4. Policy Statement

4.1 The Company maintains zero tolerance for fraud, theft, bribery, corruption, falsification of records, conflicts of interest, or any other unethical conduct.

4.2 Management is responsible for establishing and maintaining effective internal controls, and all employees are expected to act honestly, safeguard Company assets, and promptly report concerns.

4.3 This policy shall be read and applied together with the Company's Whistleblowing/ Protected Disclosures Policy. Both policies are of equal standing within the Company's governance framework and shall be interpreted consistently to give effect to their respective purposes.

4.4 In the event of any apparent inconsistency, ambiguity, or uncertainty between this policy and the Whistleblowing/ Protected Disclosures Policy, the matter shall be referred to the Board of Directors or the appropriate Board Committee for determination, in accordance with the Whistleblowing/ Protected Disclosures Policy.

5. Definitions

5.1 Fraud has the meaning ascribed to it in this policy and, for the avoidance of doubt, shall be interpreted consistently with the definition of fraud referenced in the Company's Whistleblowing/ Protected Disclosures Policy.

5.2 Unethical Conduct refers to behaviour that breaches this policy, the Company's values, or applicable laws and regulations, whether or not such behaviour meets the threshold of fraud.

5.3 Reportable Matter, for the purposes of this policy, has the same meaning ascribed to it in the Company's Whistleblowing / Protected Disclosures Policy and includes any concern relating to fraud, unethical conduct, conflicts of interest, breaches of Company policy, violations of law or regulation, retaliation, or other misconduct that may expose the Company to legal, financial, or reputational risk.

6. Prohibited Conduct

6.1 Fraud

6.1.1 Fraud includes, but is not limited to, theft, misappropriation, or unauthorized use of cash, inventory, raw materials, finished goods, equipment, vehicles, fuel, or other assets.

6.1.2 Fraud includes falsification or manipulation of financial, operational, or inventory records, including the use of fictitious vendors, inflated invoices, or unauthorized payments.

6.1.3 Fraud includes improper handling or reporting of money or financial transactions.

6.1.4 Fraud includes bribery, kickbacks, facilitation payments, inducements, or collusion with suppliers, customers, or employees to bypass internal controls or divert assets.

6.2 Unethical Conduct

6.2.1 Unethical conduct includes misuse or unauthorized disclosure of confidential or proprietary information.

6.2.2 Unethical conduct includes insider profiteering or misuse of non-public information.

6.2.3 Unethical conduct includes conflicts of interest.

6.2.4 Unethical conduct includes any conduct that undermines trust, transparency, or internal controls.

7. Conflicts of Interest

7.1 A conflict of interest exists when personal interests interfere, or appear to interfere, with the interests of the Company.

7.2 Employees and directors must disclose actual or potential conflicts of interest and recuse themselves from related decisions.

7.3 Conflicts of interest include approving transactions that benefit oneself, relatives, or connected parties; holding undisclosed financial interests in suppliers or customers; operating side businesses that conflict with Company interests; or facilitating donations or sponsorships benefiting connected persons without proper approval.

8. Gifts, Hospitality, and Benefits

8.1 Employees and directors must not offer or accept gifts, hospitality, or benefits that could influence, or appear to influence, business decisions.

8.2 Cash or cash equivalents are strictly prohibited.

8.3 Gifts or hospitality above approved thresholds must be declared and approved in accordance with Company procedures.

9. Roles and Responsibilities

9.1 The Board of Directors approves this policy and retains ultimate responsibility for its oversight, interpretation, and effectiveness.

9.2 The Board may exercise its oversight responsibilities directly or through the Audit Committee or such other Board Committee as the Board may designate, consistent with the governance framework established under the Whistleblowing/ Protected Disclosures Policy.

9.3 The Audit & Risk Management Committee provides oversight of fraud and unethical conduct investigations, reviews investigation findings, and determines escalation, referrals, and corrective actions in consultation with Legal Counsel.

9.4 Management is responsible for implementing internal controls, promoting an ethical culture, supporting investigations, and enforcing corrective actions.

9.5 Internal Audit is responsible for leading investigations of suspected fraud or unethical conduct under the authority of the Board or Audit & Risk Management Committee, maintaining investigation records, and exercising unrestricted access to records and premises relevant to investigations.

9.6 Employees, directors, and third parties are required to comply with this policy and to report suspected fraud or unethical conduct in accordance with the Company's Whistleblowing/Protected Disclosures Policy.

10. Reporting of Concerns

10.1 The Company is committed to providing secure, independent, and accessible channels for reporting Reportable Matters in order to encourage early reporting and protect whistleblowers.

10.2 Reports may be made in good faith and with a reasonable belief that the information disclosed is true at the time of reporting.

10.3 Primary Reporting Channels

10.3.1 Reports may be submitted to an independent external whistleblowing service provider appointed by the Board of Directors or the Audit & Risk Management Committee. The external provider shall receive, log, and securely transmit reports to the Audit & Risk Management Committee in accordance with agreed protocols.

10.3.2 Reports may also be submitted directly to the Chairman of the Audit & Risk Management Committee or such member of the Audit & Risk Management Committee as the Board may designate for this purpose.

10.4 Secondary Reporting Channels

10.4.1 Where appropriate, reports may be made to management or Human Resources; however, such reports shall be escalated promptly to the Audit Committee in accordance with the Whistleblowing/ Protected Disclosures Policy.

10.5 Reports may be made verbally, in writing, electronically, or anonymously, using the reporting mechanisms communicated by the Company from time to time.

10.6 Receipt of disclosure is to be acknowledged within 24-48 hours after submission and followed by a period of investigation and ultimately, resolution.

10.7 Internal Audit shall not serve as the primary intake channel for whistleblower reports. Internal Audit may be appointed by the Board of Directors or the Audit Committee to investigate Reportable Matters following intake through the approved channels.

10.8 All reports under this policy shall be handled in accordance with the Company's Whistleblowing/Protected Disclosures Policy, which governs confidentiality, protection of whistleblowers, prohibition of retaliation, investigation authority and independence, and escalation to the Audit Committee and Board of Directors.

10.9 Nothing in this policy limits the right of a whistleblower to make a protected disclosure to a regulator or authority in accordance with applicable law, as set out in the Whistleblowing/ Protected Disclosures Policy.

11. Confidentiality

All reports and investigations will be handled confidentially and on a strict need-to-know basis. Employees must not conduct independent investigations or confront suspected individuals.

12. Investigation Process

12.1 All reports of suspected fraud or unethical conduct shall be assessed and investigated in accordance with the investigation authority and procedures set out in the Company's Whistleblowing/Protected Disclosures Policy.

12.2 Investigations shall be conducted under the authority of the Board of Directors or the appropriate Board Committee and may be carried out by Internal Audit, an external investigator, or such other independent party as approved by the Board or Board Committee.

12.3 Investigators shall have full and unrestricted access to all Company records, systems, premises, personnel, and information necessary to perform their duties.

12.4 Investigation findings shall be reported to the Audit & Risk Management Committee and, where appropriate, the Board of Directors, in accordance with the reporting and escalation framework established under the Whistleblowing/ Protected Disclosures Policy.

13. Protection Against Retaliation

13.1 The Company strictly prohibits retaliation, harassment, intimidation, victimization, or adverse treatment against any person who reports a concern in good faith under this policy or the Company's Whistleblowing/ Protected Disclosures Policy.

13.2 Protection against retaliation, confidentiality safeguards, and the treatment of good-faith and malicious reports are governed by the Whistleblowing/Protected Disclosures Policy, which shall prevail in respect of whistleblower protections.

13.3 Any act of retaliation constitutes a serious breach of Company policy and may result in disciplinary action, up to, and including termination of employment or contract.

14. Disciplinary and Remedial Action

14.1 Where an investigation substantiates fraud or unethical conduct, disciplinary and remedial action shall be taken in accordance with this policy, the Company's Whistleblowing / Protected Disclosures Policy, Human Resources policies, employment contracts, and the Delegation of Authority Schedule.

14.2 Disciplinary action may include warnings, suspension, reassignment, termination of employment or contract, recovery of losses, civil proceedings, or referral to regulatory or law enforcement authorities, as appropriate.

14.3 Investigators shall have no authority to impose disciplinary action but may make recommendations to management, the Audit & Risk Management Committee, or the Board of Directors.

15. Policy Hierarchy and Board Approval

15.1 In the event of any inconsistency between this Policy and the Company's Whistleblower Policy, the Whistleblower Policy shall prevail for matters involving senior management, directors, retaliation, or systemic misconduct.

15.2 This Policy is issued under the authority of, and approved by, the Board of Directors of LASCO Manufacturing Limited.

15.3 This Policy supersedes all previous Company policies relating to sexual and other unlawful harassment.

16. Training, Certification and Review

16.1 All employees must acknowledge this policy annually
16.2 Targeted training will be provided for high-risk roles
16.3 This policy shall be reviewed at least every two years and approved by the Board

17. Approval

Approved for and on behalf of the Board of Directors on the 30th day of July 2026

James E.D. Rawle
EXECUTIVE CHAIRMAN

Vincent A. Chen
COMPANY SECRETARY