



POPIA – PROCUREMENT COMPLIANCE STATEMENT

Page: 1 of 2
Revision: 0
Date: June 2021

PROCUREMENT COMPLIANCE STANDARD

LTM provides a full and extensive range of products and services to a diverse range of clients. We seek excellence in every aspect of our business and are committed to the highest standards of professionalism, ethics, and integrity. This includes a commitment to working with Suppliers to ensure a high level of compliance. We look for compliance in the categories set out below and expect our Suppliers to share our commitment and to have their own internal policies and procedures in place to support such commitment.

The provisions of these Procurement Compliance Standards shall survive the term of any applicable contractual agreement made between the relevant Supplier and any LTM entity.

Confidentiality

LTM treats the information of our clients, employees, consultants, and partners with the utmost respect. As a company we have professional obligations of confidentiality, and it is important that our Suppliers understand this.

All Suppliers will be expected to keep all information received about any LTM entity, its clients, or its staff as confidential. We require our Suppliers to put in place safeguards to ensure that access to confidential information is appropriately restricted.

All Suppliers will be required to enter into a Non-disclosure Agreement on standard LTM terms where confidential information is to be provided in advance of contractual agreements. All Supplier contracts with LTM will contain robust confidentiality clauses to ensure the maintenance of confidentiality of our people and our clients.

INFORMATION SECURITY

LTM is committed to maintaining the highest standard of information security when it comes to handling our clients', employees, and our own information.

All Suppliers are expected to put in place appropriate technical and organisation measures to protect information received about any LTM entity, its clients, or its staff.

We expect our Suppliers to have their own internal information security policy which will be made available to us for review. If we have concerns about the adequacy of the security measures, we may require our Suppliers to comply with the LTM Information Security Policy which outlines the behaviours and security measures required in protecting the information of our clients and the firm.

Data Protection

LTM is fully committed to compliance with its obligations as a data controller and/or regulated entity under the General Data Protection Regulation (GDPR) and the Protection of personal Information Act (POPIA) and all other data protection legislation in the jurisdictions in which we operate or where our personal data is transferred or processed (the "Global Data Protection Laws").

We expect our Suppliers to be fully aware of and abide by the applicable Global Data Protection Laws, and not do anything which would prevent LTM from complying with its obligations under applicable Global Data Protection Laws.

Anti-bribery and corruption

LTM is committed to preventing bribery and corruption. LTM has anti-bribery policies designed to prevent persons employed by or performing services on its behalf from paying or receiving bribes. We expect anyone providing services to or seeking to win business from us, to have similar policies, or to comply with the LTM anti-bribery policies.

Revised by: Linda Daneel

Signature:

Approved by: Hardus Visagie

Signature:



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Page: 2 of 2
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It is important to us that our Suppliers share our commitment to preventing bribery and corruption, not least because, in certain circumstances, it could be alleged that we or our clients are liable for the actions of others. If they bribe on our behalf or on our clients' behalf to obtain or retain work or a business advantage for us or our clients.

Our policy specifically prohibits dealings with any third party for the purpose of improperly obtaining or retaining business or for any other improper purpose or business advantage.

If you have a conflict in the provision of goods or services to us because of an outside interest or relationship, we expect you to disclose that to us.

Our Suppliers must not offer any partner or employee of LTM any gift or hospitality which is of such value that it might have the effect of improperly influencing their decisions.

Tax evasion

It is LTM's policy to adhere to all applicable tax laws and we expect our suppliers to do the same. We expect you to implement appropriate procedures, systems, and controls relevant to your business to prevent the criminal facilitation of tax evasion.

We do not support deliberate and dishonest complicity in tax evasion or avoidance (or financial crime more widely) and any suppliers or representatives found to be engaging in these practices may be reported to the relevant authorities.

REGULATORY COMPLIANCE

As a company which has clients globally, LTM is regulated in every jurisdiction where we provide goods or services. Our regulators have a say in the way we do business, and they regulate our relationships with third party suppliers and service providers. We expect our Suppliers to recognise the fact that we are subject to such regulatory obligations - the nature and extent of which may differ from one jurisdiction to the next – and that it may affect our dealings with them.

Where a Supplier has access to LTM's confidential information, it is our expectation that the Supplier will permit audits to be carried out as required by our regulators and to provide every assistance reasonably requested by them (and us) in this regard.

WORKPLACE HEALTH & SAFETY

We expect our Suppliers to be fully aware of and abide by their obligations under applicable workplace health and safety legislation, regulations, and standards, and to have in place an internal policy to ensure compliance with such obligations.

Revised by: Linda Daneel

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