

# Partner Code of Conduct

# Table of contents

1. Scope of Code
2. Implementation of the Code
3. Good governance
4. Protection of personal data
5. Ethical business practices
  - a. Contract of employment and working hours
  - b. Child labour
  - c. Forced labour
6. Occupational health and safety
7. Freedom of association and right to collective bargaining
  - a. Discrimination and disciplinary practices
  - b. Payment
  - c. Anti-bribery and corruption
8. Compliance with legislation regarding new employees
  - a. Respecting intellectual property rights
9. Sustainability
10. Trade sanctions





# Scope of Code

This Partner Code of Conduct (hereinafter "Code") describes the ethical and legal duties, responsibilities and obligations of any Supplier, or Manufacturer, or Reseller, or Distributor (hereinafter "Partner") of Lumon Group (hereinafter "Lumon"). The requirements described here are based on international labour standards set out in the ILO conventions, the United Nations' Universal Declaration of Human Rights, the United Nations' Guiding Principles for Business and Human Rights and the Convention on the Rights of the Child, as well as OECD Guidelines for Multinational Companies.



# Implementation of Partner Code of Conduct

The Partner shall implement the therein defined requirements across their business operations and supply chains. The Partner shall also communicate the content of this Code to its employees and ensure that necessary trainings and procedures are in place for ensuring compliance with this Code.

The Partner shall comply with all applicable laws, regulations, and directives in any country where the Partner has its business operations. The Partner is encouraged to report any suspected violations or non-compliance with this Code to Lumon.





# Good governance

The Partner abides by good corporate governance practices, including any developments thereof, to ensure compliance with any applicable legislation and the requirements of this Code.





# Protection of personal data

The Partner ensures compliance with any applicable data protection regulation and high standards of information security to safeguard privacy of individuals. Processing of personal data must be appropriate and must take place for a specific purpose and with the consent of the person concerned or on the basis of another justifying basis established by law. Everyone has the right to access the information that has been collected about them and to have it corrected.





# Ethical business practices

The Partner undertakes to act ethically and with integrity while conducting its business operations. Marketing shall be done in accordance with generally accepted marketing principles. Commercial purposes shall be recognizable in any marketing actions.

## Contract of employment and working hours

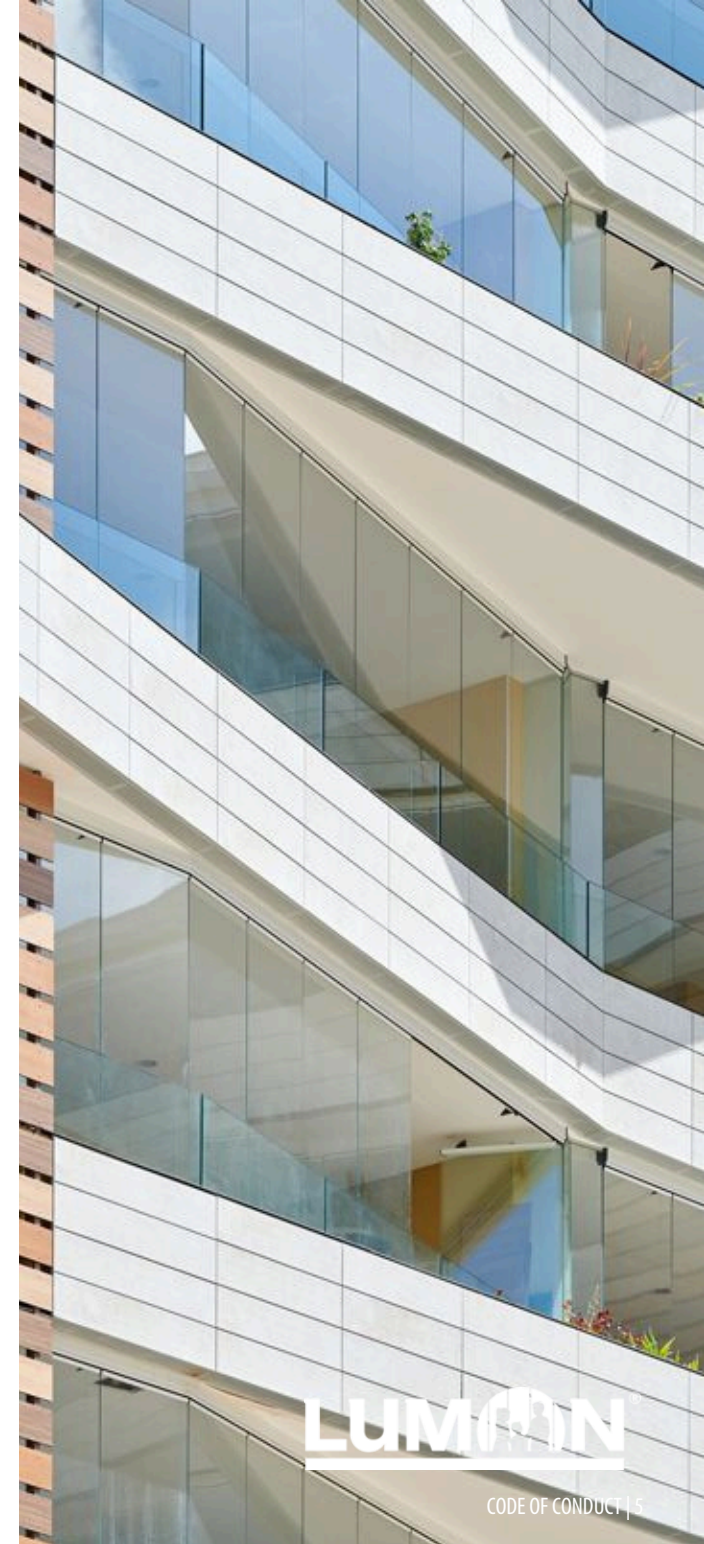
All employees shall have an employment contract that defines the terms and conditions of employment. Employees' working hours will comply with applicable national laws, and they are not excessive.

## Child labour

No person is employed who is below the minimum legal age for employment in line with ILO Convention 138 on Child Labor. Children, meaning any person under 18 years, are not employed for any hazardous work, or for work that is inconsistent with their normal development. The best interests of the child shall be the primary point of consideration in any situation, where a child is being employed. Policies and programs that assist any child found to be performing child labour are developed by the Partner.

## Forced labour

Forced, bonded or compulsory labour, slavery or human trafficking is prohibited. Any employee shall be free to leave their employment after reasonable notice. Employees are not required to lodge deposits of money or identity papers with their employer.



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# Occupational health and safety

A healthy and safe working environment is provided for employees in accordance with international standards and national laws. Any accommodation provided the employer shall always meet the basic needs of employees, including but not limited to those of safety and cleanliness.

Health and safety information and training is provided to employees, as appropriate.





# Freedom of association and right to collective bargaining

All employees are free to join or not to join trade unions or similar external representative organization and to use their rights to collective bargaining as allowed by applicable national legislation.

# Discrimination and disciplinary practices

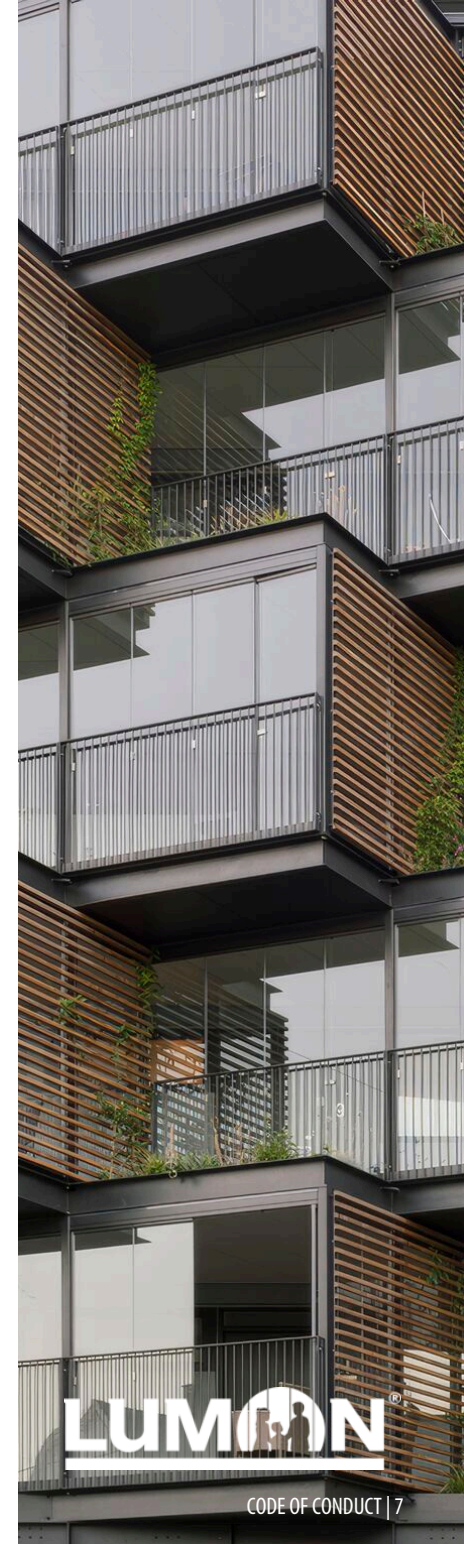
Negative discrimination such as racial or gender discrimination is prohibited. Employees are treated with respect and dignity. Mental or physical coercion, abuse or harassment and any threats or other forms of intimidation are prohibited.

# Payment

Employer must ensure that employees understand the conditions of their employment. Type of work being performed, fair and reasonable pay in line with statutory minimum wage is provided as well as fair and reasonable terms of employment.

# Anti-bribery and corruption

No form of bribery is tolerated. This includes strict prohibition of any inappropriate offers for payment to or by employees, customers, Partners, organizations, or individuals. Partner shall have reasonably adequate policies and procedures in place to monitor bribery and corruption risks.



## Compliance with legislation regarding employees

If the Partner posts its employees from abroad or otherwise provides them to Lumon, the Partner shall ensure that the requirements set out in the legislation of the destination country are fulfilled.

## Respecting intellectual property rights

The Partner respects any laws, regulations and international treaties that govern and protect intellectual property rights such as copyright, patents, trademarks, and confidential information of others, among other. Partner undertakes not to infringe any third-party intellectual property rights or confidential information while providing or developing its services and products.





# Sustainability

The Partner will take the environment and sustainability needs into consideration while running its business operations.

The Partner ensures compliance with all applicable environmental legislation and regulation.





# Trade sanctions

The Partner's business operations and goods and services provided by the Partner shall neither directly nor indirectly originate from any Sanctioned Person, country, state, territory or region, nor shall the remuneration for the goods and services provided by the Partner go to the benefit of any Sanctioned Person, or any other Person against which/whom there are sanctions imposed by the United Nations, EU, United Kingdom or United States of America either prohibiting, restricting, or otherwise targeting the transaction.

The Partner represents that neither the Partner, any of its owners, any subcontractor used in connection with the business operations nor any of their affiliates or their respective officers or directors is a Sanctioned Person.

Nothing in the business relationship between Lumon and the Partner is intended, and nothing herein should be interpreted or construed, to induce or require either Lumon or the Partner to act in any manner (including failing to take any action in connection with a transaction) that is inconsistent with, penalized, prohibited or expose such Party to any risk of punitive measures under Sanctions Laws\* .

Nothing in the business relationship or any agreement or contract between Lumon and the Partner is intended, and nothing herein should be interpreted or construed, to induce or require Lumon or the Partner to comply with any international boycott, if compliance to any agreement or contract to comply between Lumon and the Partner could violate antiboycott laws or regulations applicable to Lumon or the Partner.

\*Sanctions Laws means any law, regulation, order or directive which imposes trade sanctions (including, without limitation, asset blocking/freezing, trade embargoes, and other financial restrictions) against countries, individuals or entities on grounds whether pursuant to United Nations Security Council Resolutions or on an autonomous national or regional basis, including, without limitation: (i) sanctions administered by the Office of Foreign Assets Control of the U.S. Treasury Department or by the U.S. Department of State; (ii) sanctions or restrictive measures imposed by the European Union or its Member States; (iii) sanctions or restrictive measures imposed by Her Majesty's Treasury of the UK; or (iv) similar laws, regulations, orders and directives of other jurisdictions, but only to the extent such other jurisdictions under this sub-article (iv) are applicable.





A modern, multi-story apartment building with a mix of light blue and white facades and dark window frames. The building features large glass balconies and windows, some of which are illuminated from within, suggesting an evening or dusk setting. The sky is a soft, pale blue. In the foreground, there are blurred green trees and a street lamp.

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