

LOMGroup Supplier Code of Conduct

LOMGroup is a holding company company. Operating thru its affiliations, share companies and joint ventures worldwide in several sectors. LOMGroup operates under several brands and companies.

We are fully aware of the responsibility we bear towards our customers, shareholders, employees and the communities in which we work. Thus, we have given ourselves a strict set of ethical standards to guide us in our business dealings.

We expect all of our suppliers, i.e. all companies who do business with any company or division of LOMGroup, to adhere to the same ethical standards. For this purpose, LOMGroup has drawn up this Supplier Code of Conduct, which sets the minimum standards for doing business with any Group company or division.

Laws and Ethical Standards

The supplier shall comply with all laws applicable to its business. The supplier should support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practice. This especially applies to:

Human Rights and Fair Labor Practices

▪ Child Labor

The supplier shall not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it shall be 15 years. Workers under the age of 18 shall only perform work in accordance with legal requirements (e.g. with regards to working time and working conditions) and subject to any requirement regarding education or training.

▪ Forced Labor

The supplier shall not use any form of forced, bonded or involuntary labor. All labor must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). The supplier shall ensure that workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. The supplier shall be responsible for payment of all fees and expenses (e.g. licenses and levies) relating to workers, where legally required.

Punishment, mental and/or physical coercion are prohibited. Disciplinary policies and procedures shall be clearly defined and communicated to the workers.

▪ Compensation and Working Hours

The supplier shall comply with all applicable national laws and mandatory industry standards regarding working hours, overtime, wages and benefits. The supplier shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.

Deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted.

- **Freedom of Association and Collective Bargaining:**

The employees of the supplier must be free to join or not to join a union/employee representation of their choice, free from threat or intimidation. The supplier recognizes and respects the right to collectively bargain in accordance with applicable laws.

- **Diversity**

The supplier shall promote an inclusive work environment that values the diversity of its employees. The supplier shall not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under law.

Health & Safety

We expect our suppliers to strive to implement the standards of occupational health and safety at a high level by applying a health and safety management approach appropriate for the business. The supplier shall comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures. Employees are to be adequately educated and trained in health and safety issues.

Data Protection and Disclosure of Information

The supplier shall adhere to relevant data protection and security laws as well as to respective regulations, in particular with regard to personal data of customers, consumers, employees and shareholders. The supplier shall comply with all said requirements when personal data is collected, processed, transmitted or used.

Suppliers shall safeguard and make only appropriate use of confidential information. The supplier shall not disclose any information that is not known to the general public.

Bribery and Corruption

The supplier shall comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations and standards. The supplier shall not (either directly or indirectly) offer or promise to provide anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business.

Trade Regulation

The supplier shall comply with all applicable trade and import regulations including sanctions and embargoes that apply to their activities.

Money Laundering & Financial Records

The supplier shall comply with applicable laws and regulations designed to combat money laundering activities. The supplier shall maintain financial records and reports according to international laws and regulations.

Fair Competition

The supplier shall comply with applicable competition and anti-trust laws.

Conflicts of Interest

A conflict of interest arises when an individual has a private/personal interest which could appear to influence their decisions. Such conflict of interest situations include a relationship by blood or

marriage, partnership, business partnership or investment. The supplier shall disclose any actual or potential conflict of interest with LOMGroup personnel.

Environment

The supplier shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.

We expect our business partners to strive to support LOMGroup's climate protection goals through the products and services they deliver (e.g. by providing relevant data on climate protection). In this regard, we also expect our suppliers to take climate protection appropriately into account in their own operations, for example by setting climate protection goals for themselves and achieving them.

Business Continuity Planning

The supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases). This preparedness especially includes disaster plans to protect both employees as well as the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

Business Partner Dialogue

The supplier shall encourage its own suppliers to adhere to this Supplier Code of Conduct as part of fulfilling their contractual obligations.

Compliance with the Supplier Code of Conduct

LOMGroup reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. LOMGroup encourages its suppliers to implement their own binding guidelines for ethical behavior.

Any breach of the obligations stipulated in this Supplier Code of Conduct is considered a material breach of contract by the supplier.