

# Lumene Group Partner Code of Conduct

## INTRODUCTION

The Lumene Group of companies, hereinafter referred to as the “Lumene Group” in this Partner Code of Conduct, refers to the companies controlled by Lumene Group Oy (Business ID 3208686-5), including Lumene Oy (Business ID 2377940-8) and its subsidiaries Cutrin Oy (Business ID 2443709-8), Lumene Group Sweden AB (Business ID 559228-0191), and Lumene North America LLC (registration number 20-4349663). This code of conduct is applicable to all suppliers, service providers, partners and other third parties with whom we co-operate and have a business relationship (individually a “Partner” and collectively, “Partners”).

Lumene Group is home to four Nordic beauty brands: LUMENE, a leading Nordic beauty brand offering skin-loving skincare, face makeup, color cosmetics, and hair care products for natural feel-good glow; IDA WARG Beauty, a trusted beauty brand for lovable results, bringing playful hair care, self-tan and body care for all senses, every day; CUTRIN, salon professional hair care that combines the best of Nordic nature and advanced science for everyday hair confidence; and Promise, a salon-exclusive professional hair care brand for bold creativity and high-performance results in unique designs.

The Lumene Group prides itself on its uncompromising expertise, research, and product development capabilities, which combine the latest technology with potent local arctic ingredients, sourced sustainably and preferably from the side-streams of local industry. We manufacture majority of our products in Finland and employ about 350 people across multiple geographies.

The beauty philosophy of the Lumene Group is rooted in Nordic culture and values and has a close relationship with pure and diverse Nordic nature. Our aim is to commit and contribute to a sustainable future for beauty, with a fully comprehensive approach towards circular economy and with climate actions focusing on reduction of greenhouse gas emissions and promotion of biodiversity.

The Lumene Group is committed to conducting its activities in accordance with all applicable laws, regulations, best practices and principles set out in international conventions in particular with regard to ethics and business integrity, labour and social responsibility, and protection of the environment. Therefore, the Lumene Group expects its Partners to act accordingly and be committed to this Partner Code of Conduct and the principles set out in the United Nations’ Global Compact and in relevant international conventions and standards, such as the United Nations’ Universal Declaration of Human Rights and the conventions of International Labour Organisation, as well and to ensure that their own partners also do the same when conducting business with the Lumene Group.

The Lumene Group believes that cooperation is the cornerstone of positive change. We select our Partners carefully and engage in collaborative and open communication with them. We also expect our Partners to comply with the sustainable operating principles relating to ethical, social, and environmental aspects set out in this Partner Code of Conduct, thereby ensuring responsible procurement, and enabling the Lumene Group to work towards achieving its sustainability objectives, and ultimately towards a circular economy.

## ETHICS

### General requirements

The Lumene Group requires its Partners to be committed to ethical conduct, in full compliance with all applicable laws, regulations and international treaties, and respect for human rights according to internationally recognized standards. Should a requirement of this Partner Code of Conduct be in contradiction with the applicable laws, Partners are expected to comply with the laws.

### Confidentiality

Partners are expected to take all necessary measures to safeguard and make only appropriate use of confidential information they receive in the course of their actions with the Lumene Group. Any use of such confidential information for purposes other than for which it was provided is prohibited. Partners must have sufficient information technology

safeguards in place to protect the Lumene Group's confidential information from unauthorized access or disclosure, improper use, theft or destruction.

### **Protection of intellectual property rights**

Lumene Group protects its intellectual property and respects the intellectual property rights of others. Partners shall comply with all applicable laws and international treaties on intellectual property and to refrain from infringing intellectual property rights of the Lumene Group or a third party.

### **Business ethics**

The Lumene Group requires its Partners to commit to the highest standards of ethical business conduct. All forms of corruption, bribery, money laundering, and unlawful restrictive trade practices are strictly prohibited, and the partners are expected to make every effort to prevent, detect and discipline the same. Partners must also respect all applicable international trade restrictions and economic and trade sanctions. Partners are responsible for ensuring and monitoring their customers', suppliers', or other business partners' compliance with this Partner Code of Conduct and Partners' own Code of Conduct. Partners must immediately inform Lumene Group by contacting the responsible Lumene Group manager of any suspected violation of this Partner Code of Conduct or if they become aware that a customer, prospective supplier, or other business partner is based or is operating in a country subject to trade sanctions or in contradiction to applicable trade sanctions.

### **Improper gifts and hospitality**

Partners shall not give any gifts or hospitality to the representatives of LUMENE GROUP in any situation in which it might influence or appear to influence the representative's decision in relation to the Partner.

### **Fair competition**

Lumene Group believes in free markets and fair competition. Lumene Group conducts its business by making use of fair market practices and in compliance with applicable competition and antitrust laws. Partners must conduct their business in fair and ethical manner and compete fairly in compliance with all applicable competition and antitrust laws.

### **Animal welfare**

The Lumene Group does not tolerate animal testing of or in its products, including animal testing of the raw materials used in its products, but requires its Partners to use scientifically valid alternatives acceptable to regulators instead.

## **LABOUR AND HUMAN RIGHTS**

The Lumene Group believes that a diverse community is more creative and empowered and therefore, equality and diversity are an important part of the work community at the Lumene Group. No decisions by the Lumene Group are affected by anyone's background, such as age, gender, or disability, or by belonging to a different language, cultural or other population group. The Lumene Group expects its Partners also to commit to strengthening the diversity of their culture and maintaining an inclusive environment. In addition, Partners shall commit themselves to uphold the human rights of employees and external stakeholders. Employees and external stakeholders must be treated with dignity and respect at all times. Partners are expected to support and respect internationally recognised human rights and to treat their employees and external stakeholders fairly, equally and with dignity. Lumene Group expects its Partners to have or work towards having a well-documented assessment of the company's impacts to people and where harm may occur in its operations, supply chain and business relationships. The Lumene Group expects its partners to engage continuous improvement actions relating to human rights due diligence.

### **Freedom of association**

In accordance with applicable laws and regulations, Partners shall respect employees' right to form or join trade unions as well as the right to collective bargaining and action.

### **Prevention of forced labour and human trafficking**

Lumene Group is committed to respecting the human rights of workers throughout our operations and supply chain and expects the same from our Partners. Modern slavery in all forms or human trafficking is not tolerated. Further, employees shall not be forced to hand over valuables passport, work permits or identification papers to their employer.

### **Prevention of child labour**

The Lumene Group does not accept child labour under any circumstances or contract with Partners using child labour. Every child is to be protected from economic exploitation and from carrying out work that can be considered dangerous, to have a negative effect on the child's education or harmful to the child's health or development. The term 'child labour' refers to work carried out by a child who is under 15 years of age, or under 14 years of age in those countries specified in Article 2.4 of ILO Convention 138 on the minimum age. A young person less than 18 years shall not be given admission to work which might jeopardize his or her health, safety or morals.

### **Working hours**

Working hours must comply with national legislation and agreements. Employees must be provided with adequate rest periods and breaks. Any reasonable overtime must be recorded and adequately compensated.

### **Wages**

Wages, benefits and overtime compensation must always comply with applicable laws, regulations and agreements corresponding to the local market standards. Any deduction from wages as a disciplinary measure is prohibited.

### **Discrimination and oppression**

The Lumene Group does not tolerate discrimination, threats, bullying, oppression or harassment in any form, and supports equal opportunities for all employees. Partners must strive to foster an environment free of discrimination and respectful of all people and their unique abilities, strengths and differences. Any discrimination based on prejudice or partiality is prohibited.

### **Health and safety**

Partners shall commit to ensuring safe working conditions and a healthy and clean working environment for their employees. Partners shall always comply with the minimum standards according to applicable laws and regulations regarding the working environment. All necessary actions to avoid accidents and work-related injuries must be taken.

## **ENVIRONMENT**

### **Sustainability**

The Lumene Group requires its Partners to comply with applicable laws, regulations and the principles set out in the UN Global Compact concerning the environment. Partners are expected to proactively work towards reducing all negative environmental impacts, including but not limited to emissions into the air, soil and waterways, and to make more efficient use of resources by promoting responsible environmental practices, circular economy and environmentally sustainable use of materials. Our suppliers are strongly encouraged to set measurable targets for the reduction of greenhouse gas emissions throughout their operations and supply chains, and to regularly report on progress towards these objectives.

### **Palm oil, palm kernel oil and their derivatives**

All our palm oil suppliers must be members of the RSPO (Roundtable on Sustainable Palm Oil) and source their raw material from producers who are also members of the RSPO. Partners must report the quality of palm oil, palm kernel oil or their derivatives used (Mass Balance or others) in raw materials supplied to the Lumene Group.

### **Soya oil and its derivatives**

Partners must report to the Lumene Group the proportion of soya oil and/or its derivatives used in raw materials supplied to the Lumene Group that is certified as sustainable (organic or Identity Preserved (IP)).

### **Genetically modified organisms, GMOs**

Any products supplied to Lumene Group, including their production processes, shall be free from genetically modified organisms, GMOs.

### **Environmental permits and reporting**

Partners shall make sure that they obtain, keep current, and follow the reporting guidelines of all the required environmental permits and registrations. Partners shall ensure that their key employees are aware of and trained in product safety practices.

**DATA PROTECTION AND PRIVACY**

The Lumene Group requires its Partners to comply with all applicable laws, regulations and best practices in the processing and protecting of personal data, including to only collect personal data which is necessary for the purposes of processing, to ensure the accuracy of the personal data and to protect the data from unauthorised access. Any processing of personal data must be conducted in a way that it does not jeopardise the privacy of individuals any more than necessary.

**MANAGEMENT SYSTEMS**

Partners are expected to have the risk management, documentation and measurement systems in place to facilitate compliance with all applicable laws and the promotion of continuous improvement with respect to the expectations set forth in this Partner Code of Conduct.

**COMPLIANCE WITH THIS PARTNER CODE OF CONDUCT**

The Lumene Group requires that all its Partners read and comply with this Lumene Group Partner Code of Conduct and take all reasonable efforts to communicate the requirements of this Partner Code of Conduct to its employees and such partners that conduct business with the Lumene Group. Enforcement of this Partner Code of Conduct is important to the Lumene Group’s business, and it is the responsibility of Partners to ensure that this Partner Code of Conduct is implemented.

Partners shall provide upon request information and documentation supporting compliance with this Partner Code of Conduct. All Partners will also need to provide on request such registration certificates, information and documentation as required for the Lumene Group to fulfill its own mandatory obligations. More specifically, Finnish Partners will need to fulfill all the requirements of the Finnish Act on the Contractor’s Obligations and Liability when Work is Contracted Out (1233/2006, as amended), and provide all needed information and documentation to prove such compliance.

The Lumene Group reserves the right to make inspections to ensure that this Partner Code of Conduct is being enforced. These inspections may be performed by an independent third party and may be unannounced.

In case a Partner fails to comply with the terms of this Partner Code of Conduct and the remedial actions to make good such breaches to the Lumene Group’s satisfaction within an agreed time period, the Lumene Group may terminate its business relationship with the Partner.

The Lumene Group invites its Partners which become aware of misconduct or illegal activities affecting people, society, the environment, or the Lumene Group, including any non-compliance with this Partner Code of Conduct or applicable laws, to raise concern anonymously or openly by using the Whistleblowing channel of the Lumene Group, more information of which is available on <https://www.lumenegroup.com/lumene-group-whistleblowing-privacy-notice/>.

**We hereby understand, accept, and will comply with the Lumene Group Partner Code of Conduct.**

#18567320v6

Signature: .....

Name and position: .....

Company: .....

Date: .....