

## Lumene Group Public Affairs and Advocacy Policy

### Version History

Version	Date	Description	Author	Approved by
1.0	16 <sup>th</sup> Feb 2026	Approval	R&D Function / Alain Mavon	Lumene Group Leadership Team
1.0	4 <sup>th</sup> Mar 2026	Approval	R&D Function / Alain Mavon	The Board of Directors

This Public Affairs and Advocacy Policy outlines Lumene Group's approach to engaging with public stakeholders. It ensures transparent, ethical, and consistent advocacy aligned with our values, sustainability goals, and legal and regulatory frameworks.

Lumene Group does not typically engage in direct lobbying. When needed, advocacy is conducted directly or through intermediary organizations such as industry associations or NGOs, ensuring alignment with our values and compliance with relevant laws. We are committed to ethical business conduct, transparency, and responsible corporate citizenship. We recognize our responsibility to contribute positively to society and the environment.

This policy applies to all Lumene Group employees, executives, and any third parties acting on our behalf. It is applicable globally, with respect for local laws and cultural contexts.

### Principles for responsible public affairs and advocacy

Lumene Group commits to the following principles:

- **Positive impact:** We will engage in public affairs and advocacy activities, including lobbying, only when they aim to create a positive impact on society or the environment.
- **Integrity, transparency, and compliance:** All interactions under this policy with public officials and stakeholders must be honest, open, and documented, and must adhere to all applicable laws, regulations, and internal code of conduct.
- **Evidence-based advocacy:** Our positions will be based on reliable and/or scientific data.
- **Political contributions:** Lumene Group does not support political parties or candidates and does not make financial or in-kind contributions to political parties and candidates.
- **Anti-corruption and bribery:** We maintain a zero-tolerance policy toward corruption and bribery in all our operations, including lobbying activities.
- **Intermediary organizations:** Lumene Group is a member of the Finnish Cosmetic and Hygiene Industry Association, which may conduct lobbying on behalf of the industry. We also hold a board position within the association. We regularly review the association's lobbying positions to ensure alignment with our values and this policy and reserve the right to publicly distance ourselves from any activities that conflict with our principles.

- **Disclosure and reporting:** All lobbying is registered where required. Lobbying activities will be reported annually, and all meetings with public officials are internally documented.

### **Governance and oversight**

This policy is reviewed and approved by the Lumene Group Board of Directors and is subject to review at least every two years to ensure its continued relevance and effectiveness. The VP of R&D & Sustainability is accountable for enforcing the policy and ensuring compliance throughout the organization. The policy is embedded within Lumene Group's corporate governance framework and is communicated to relevant internal and external stakeholders to ensure awareness and alignment. It's also publicly available on our website to ensure transparency and accountability to all stakeholders.

We proactively assess and monitor potential risks associated with public affairs and advocacy activities, including those carried out by intermediary organizations, and take corrective action when necessary. Regular internal reviews are conducted to evaluate compliance with this policy and to identify opportunities for improvement.

Stakeholders are encouraged to raise any concerns related to our business practices, including lobbying, through our confidential Whistleblowing channel:

<https://www.lumenegroup.com/lumene-group-whistleblowing-privacy-notice/>