

## Lumene Group's Human Rights Policy

Lumene Group is committed to corporate human rights responsibility, which forms the foundation of social sustainability. Lumene Group's approach is guided by the UN Guiding Principles on Business and Human Rights.

This Human Rights Policy guides and strengthens Lumene Group's approach to human rights responsibility by setting out key principles and guidelines.

To support Lumene Group's work on human rights and the implementation of this Policy, a human rights impact assessment (HRIA) covering the Group's value chain was carried out at the beginning of 2026 with the support of external experts. The assessment provides a solid foundation for the further development of Lumene Group's work in this area.

### **Lumene Group respects human rights**

Lumene Group is committed to respecting internationally recognised human rights, including labour rights, as defined in international human rights norms adopted by states.<sup>1</sup> In line with the UN Guiding Principles, the Group conducts human rights due diligence to identify, prevent, mitigate, and account for how it addresses actual and potential adverse human rights impacts related to its operations and business relationships.

Lumene Group considers impacts across its entire value chain. Particular attention is paid to four key stakeholder groups and to respecting the human rights of individuals belonging to them: the Group's own work community, consumers, workers in the supply chain, and nearby residents and affected communities.

### **Lumene Group's relevant human rights issues**

Lumene Group's *own work community* is its core stakeholder group, as the Group has direct and significant impacts on, and leverage over, the well-being and working conditions of individuals within it. The HRIA identified the following salient human rights issues for this group to be prioritised: protecting life and health; equality and non-discrimination; and work-life balance. Other relevant issues include preventing inappropriate treatment and behaviour, such as harassment, bullying, and mobbing; protecting privacy, including personal data security; the opportunity to express one's identity at work; freedom of expression; and trade union rights.

*Consumers* are essential to Lumene Group's business, and the Group has direct impacts on them through its products. For this stakeholder group, the following human rights themes have been identified as salient: protecting life and health; equality and non-discrimination; and protecting privacy, including personal data security.

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<sup>1</sup> The most central human rights norms to be taken into account in business are set out in the International Bill of Human Rights (including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) and in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

In its sourcing, Lumene Group pays due regard to the rights of *workers in its supply chain*. Particular attention is given to fundamental human rights issues, such as protecting life and health; preventing child labour; and preventing work under prohibited conditions, including forced labour and human trafficking. In addition, relevant themes include equality and non-discrimination; a living wage and reasonable living conditions; and trade union rights.

With regard to *nearby residents and affected communities*, Lumene Group places particular emphasis on protecting life and health.

### **Continuous improvement, remediation, and cooperation**

In accordance with the UN Guiding Principles, Lumene Group is committed to continuously improving its work on human rights responsibility.

While Lumene Group has taken steps to prevent and mitigate negative human rights impacts within its value chain, it continues to refine its processes and practices to strengthen prevention and mitigation. As part of this work, Lumene Group seeks to enhance communication and transparency regarding its performance in the area of human rights.

Lumene Group is also committed to developing and maintaining appropriate remediation processes and measures in cases where it has caused or contributed to negative human rights impacts.

Furthermore, Lumene Group considers close cooperation and meaningful engagement with relevant stakeholders, including business partners and collaborators, essential to strengthening its efforts to respect human rights.

This policy was adopted by Lumene Group's Board of Directors on 4 March 2026.