

Lumene Group's Responsible Marketing and Public Relations Policy

Purpose and scope

This Responsible Marketing and Public Relations Policy outlines Lumene Group's commitment to conducting all marketing and public relations (PR) activities in a responsible, ethical, and transparent manner.

At Lumene Group, all our marketing and communications are grounded in compliance with applicable laws and regulations, including the EU Cosmetics Regulation and consumer protection legislation. In addition, we follow recognized industry standards and self-regulatory frameworks, such as the Cosmetics Europe Charter and Guiding Principles for Responsible Marketing Communications and the International Chamber of Commerce (ICC) Advertising and Marketing Communications Code. All marketing and PR activities must also align with internationally recognized standards of ethical business conduct, fair labor, social responsibility, environmental sustainability, and good governance.

Beyond compliance, all our marketing and communications must reflect Lumene Group's core values: inclusivity, integrity, transparency, growth-orientation, curiosity, and care. These frameworks ensure that our communications are truthful, substantiated, and respectful of consumer rights.

This policy applies to all marketing and PR activities conducted by or on behalf of Lumene Group and its current brands, LUMENE, IDA WARG Beauty, CUTRIN, and Promise, across all markets and communication channels. It governs the actions of Lumene Group employees involved in marketing, communications, PR, and brand-related activities, as well as external agencies, consultants, and partners working on our behalf. This policy covers all forms of communication, including advertising, social media, influencer collaborations, public statements, press releases, events, sponsorships, and product packaging and labelling.

The policy is overseen and approved by the Lumene Group Leadership Team. It is updated when needed to reflect changes in regulations, industry standards, or Lumene Group's strategic direction. Any breaches of this policy may result in corrective actions and reputational risk mitigation measures.

OUR CORE PRINCIPLES FOR RESPONSIBLE MARKETING AND PR

Responsible, truthful, and ethical communication:

- Marketing and PR practices are guided by ethical principles, especially in contexts where audiences may be more vulnerable or where messaging has heightened emotional or social impact.
- We commit to ensuring that all marketing and communications are truthful, non-deceptive, and aligned with our Lumene Group values.
- Language must be clear, understandable, and appropriate for the general knowledge level of consumers, avoiding jargon or complexity that could hinder understanding.
- All messaging must be supported by appropriate evidence and reflect our genuine practices and impact. We do not engage in exaggeration, omission of essential information, or manipulation of facts.
- We aim to minimize the use of visual retouching across imagery for all our brands. For the LUMENE brand, we apply general post-editing (e.g. brightness, contrast, saturation) to ensure

technical quality, but we do not retouch or manipulate body shape, size, or skin in advertising materials.

- We avoid any image retouching or manipulation that could mislead consumers about the efficacy or benefits of our products.
- We do not tolerate misleading, manipulative, or discriminatory content in any form.

Product claims and testing:

- Claims must be understandable, precise, verifiable, and substantiated using relevant data, and must remain proportional to Lumene Group's actual actions and impact.
- All our statements and product claims are carefully considered to ensure honest and truthful communication.
- Product efficacy claims are supported by adequate, and verifiable evidence, including efficacy studies when needed.
- Efficacy testing is conducted in cooperation with external laboratories specializing in cosmetic efficacy testing. Consumer testing panels are used to validate perception and performance.

Advertising integrity and brand safety:

- We ensure that all advertising across media is truthful, sincere, non-misleading, and decent.
- We apply strict media buying policies and conduct careful audits of publishers and platforms before placing advertising. Our goal is to ensure that Lumene Group's content does not appear alongside hateful, discriminatory, sexual, denigrating, or otherwise harmful content.
- We ensure that our targeting practices are not discriminatory in nature and that we do not exclude audiences or media environments based on e.g. religion or race.
- We do not target advertising based on special categories of personal data, such as health information, political opinions, ethnic origin, or religious belief.
- We prioritize brand suitability and aim to collaborate only with media environments that align with Lumene Group's values.

Ethical media relations:

- We engage with media respectfully and professionally, providing timely, accurate, and truthful information in all communications.
- We respect journalistic independence and freedom of expression.
- We do not offer payments, gifts, or other incentives in exchange for positive media coverage.
- We aim to ensure that all promotional content is clearly identifiable as such, avoiding any form of covert advertising.
- All media interactions are conducted in line with Lumene Group's values, with a commitment to openness and integrity to maintain public trust.

Sustainability and impact:

- All sustainability claims must be clear, specific, verifiable, and supported by relevant data.
- We don't use vague or misleading terminology such as eco-friendly, unless it is clearly defined and substantiated, and we actively work to prevent greenwashing.
- We communicate both progress and areas for improvement in our sustainability performance.
- We follow the EU regulation and national guidance to ensure compliance.

Inclusivity and representation:

- We are committed to continuously improving how we communicate and represent the diverse communities we serve. Our goal is to foster inclusive, respectful, and empowering narratives across all our marketing and PR efforts, and we recognize this as an ongoing effort.
- We aim to use neutral and respectful language, such as preferring terms like blocklist and allowlist over blacklist and whitelist, to avoid unintended connotations.
- We strive to ensure our campaigns reflect people of all backgrounds, ages, genders, skin tones, and body types, celebrating real beauty in all its forms. This is a continuous effort, and we're committed to improving representation over time.
- We seek to avoid reinforcing harmful stereotypes or unrealistic beauty standards in our communications.

Children and youth:

- We do not target children or teens under the age of 18 in any marketing or PR activities, in line with Lumene Group's ethical standards and responsible marketing principles.
- We do not collaborate with influencers under the age of 18, ensuring that all promotional partnerships reflect our commitment to responsible communication.

Consumer engagement:

- Lumene Group places a strong emphasis on consumer engagement. We maintain an open and continuous dialogue with our consumers to ensure that our product portfolio responds to their evolving needs.
- Consumers are encouraged to share feedback and ideas through various channels, including consumer care, beauty advisors, and social channels. Feedback from consumers, partners, and regulators is used to improve our practices.

Influencer and social media responsibility:

- We guide influencers and content creators to clearly disclose any paid collaborations, advertisements, sponsorships, or commercial interests, regardless of their audience size or platform.
- We, together with our partners and influencers, share responsibility for ensuring that all influencer content is truthful and non-misleading.
- Influencers must align with Lumene Group's values and are not permitted to make exaggerated or misleading claims.

- We do not collaborate with influencers under the age of 18. If minors are featured in any content, it must be age-appropriate, non-exploitative, and created with parental consent.
- We only allow filters that serve a consumer-guiding purpose, such as helping users find their foundation shade or understand how to use a product. We do not permit filters that alter skin, body shape, or size, as they may mislead consumers about product performance.

AI in marketing & communications:

- We use AI tools to support creativity, branding, and efficiency in marketing and PR, always reviewed by human.
- AI-generated content must be truthful, clearly disclosed, and aligned with Lumene Group's values. It must fully comply with applicable laws and regulations, and be decent, honest, and free from bias, discrimination, or stereotyping.
- We remain fully responsible for all communications created or influenced by AI.
- All AI-driven activities comply with GDPR, data ethics, and Lumene Group's broader cybersecurity and privacy framework.
- We recognize the evolving risks associated with AI and are committed to enhancing internal and external information security to mitigate these risks.

Privacy and data protection:

- We respect the privacy and data confidentiality of individuals and stakeholders in all marketing and communications.
- All our activities comply with EU General Data Protection Regulation (GDPR) and other applicable regulations, including the Network and Information Systems Directive 2 (NIS2).
- Lumene Group follows a comprehensive cybersecurity and privacy framework, including the principles of ISO 27001, to ensure responsible data handling and risk management.
- Our Information Security Management System (ISMS) and Privacy Information Management System (PIMS) guide how we manage and protect personal data in marketing and PR.
- We use a dedicated platform to manage privacy and information security data, ensuring transparency and accountability.

This policy was approved by the Lumene Group Leadership Team on November 17, 2025.