

LUMENE GROUP'S MODERN SLAVERY STATEMENT 2025

Introduction

This statement, made in accordance with Section 54 of the UK Modern Slavery Act 2015, outlines the steps Lumene Group ("Group", "we", "us", "our") has taken during the financial year 2025 to ensure that slavery and human trafficking do not occur in any part of our own business or supply chain.

We recognise that modern slavery, including forced or compulsory labour, slavery, servitude, human trafficking, state-imposed forced labour, and child labour is a serious and ongoing concern when operating in a global environment. Lumene Group is committed to respecting the human rights of workers throughout our operations and supply chain as well as to ensuring that modern slavery and human trafficking are not tolerated within our business or supply chain. We also expect all our business partners and suppliers act in a manner consistent with our principles and adhere to ethical business conduct.

Lumene Group's structure and business

Lumene Group is a Nordic beauty company dedicated to developing and manufacturing high-performing skincare, makeup, and hair care products. Our purpose is to empower Better Beauty Choices, and our vision is to be the leading beauty company from the Nordics, recognised for our leading work in circular beauty among a wide international consumer group. Sustainability has been at the heart of Lumene Group for decades, making us a pioneer in the circular economy. Our commitment to sustainability and ethical practices is reflected in our status as a certified B Corporation™.

Lumene Group's main operating companies are Lumene Oy, Cutrin Oy and Lumene Group Sweden AB. We employ over 350 professionals, and our headquarters are in Espoo, Finland, where over 80% of our products are developed, designed, and manufactured. Lumene Group's headquarters, laboratory, and factory are all located under one roof in Espoo, Finland. Our brands LUMENE, CUTRIN, IDA WARG Beauty, and Promise are present in 26 countries, with online stores serving consumers worldwide. Key markets include Finland, Scandinavia, the UK, Germany and Poland.

Since September 2021, the majority owner of Lumene Group has been Verdane, a private equity company with offices across Northern and Western Europe, that is known for being a growth partner to ambitious companies committed to sustainability. In April 2025, Swedish investment company Creades became the minority owner of the Group.

Supply chain

In 2025, Lumene Group manufactured about 17 million pieces of beauty products. With the strategic choice to develop and manufacture products in Finland (80% of all our products), the Group has comprehensive control over all aspects of product development and manufacturing, including how products are designed, what kind of raw materials are chosen, and how the production is organised in the most sustainable way.

Suppliers are a vital part of our value chain. We are committed to establishing ethical and mutually beneficial relationships with our network of suppliers and partners, and we aim to continuously improve our procurement and sourcing activities, particularly with regard to sustainability issues such as modern slavery.

When working with partners, i.e., material and service providers, there is an ever-increasing need for transparency. This transparency requires ongoing monitoring, close collaboration,

and mutual reporting within these partnerships. Our suppliers are mainly European, but some materials are sourced globally. For chemical raw materials, we cooperate with global suppliers as well as Nordic companies and start-ups. Packaging componentry is mainly European with a focus on medium-sized, family-owned businesses. Our supplier relations are long-term, typically ranging from 10 to 20 years, and even longer. Naturally, new suppliers are onboarded following defined processes and approval protocols. We are currently working with approximately 100 first-tier suppliers, and for raw materials, we collaborate with around 150 second-tier manufacturers. When subcontracting production of finished goods, we maintain around ten partnerships across Europe.

Lumene Group's policies and procedures in relation to modern slavery

Lumene Group is committed to conducting its activities in accordance with all applicable laws, regulations, best practices, and principles set out in international conventions, particularly in relation to ethics and business integrity, labour and social responsibility, and environmental protection. Therefore, we expect our partners to act accordingly and to be committed to our Partner Code of Conduct and the principles set out in the United Nations Global Compact, as well as in relevant international conventions and standards, such as the United Nations Universal Declaration of Human Rights and the conventions of International Labour Organization and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Lumene Group has several group-wide policies and processes in place relevant to human rights and modern slavery, which we regularly review and update with input from both internal and external stakeholders. Our policies relevant to human rights and modern slavery include those listed in the following table.

Policy or process	Commitment
Lumene Group Code of Conduct	Lumene Group Code of Conduct sets the standard for ethical behaviour for all our employees and business partners. The Code of Conduct is supplemented by additional policies and guidelines.
Lumene Group Partner Code of Conduct	<p>Lumene Group requires its partners (including suppliers) to commit to ethical conduct, full compliance with all applicable laws, regulations and international treaties, and respect for human rights according to internationally recognised standards. The Partner Code of Conduct is based on the principles of the United Nations Global Compact. All forms of corruption, bribery, money laundering, and unlawful restrictive trade practices are strictly prohibited.</p> <p>Lumene Group Partner Code of Conduct addresses topics such as labour and human rights, prevention of child labour, prevention of forced labour and human trafficking, and freedom of association.</p> <p>Lumene Group Partner Code of Conduct is published on Lumene Group's website.</p>
Lumene Group Human Rights Policy	This Human Rights Policy guides and strengthens Lumene Group's approach to human rights responsibility by setting out key principles and guidelines.

Lumene Group Sourcing Policy	Lumene Group Sourcing Policy defines guidelines for the ways of working within the Group and its value chain. Lumene Group's Sourcing Policy ensures ethical, high-quality, and sustainable procurement, supporting the Group's mission while fostering strong supplier relationships. It applies to all suppliers, including sub-contractors, agents, and subsidiaries, prioritises local sourcing in the Nordics and Europe, and acknowledges the global nature of the value chain.
Lumene Group Corporate Social Responsibility Policy	<p>Lumene Group Corporate Social Responsibility Policy (CSR) outlines our efforts to give back to the society. Lumene Group is dedicated to protecting human rights and providing a safe and equal workplace to every employee in our value chain. We are committed to ethical practices, people policies, and diversity, equity & inclusion (DE&I).</p> <p>Lumene Group Corporate Social Responsibility Policy (CSR) is described in the LUMENE Group Annual Report 2025, published on Lumene Group's website.</p>
Lumene Group Risk Management Policy	Lumene Group's risk management is guided by the Risk Management Policy approved by the Board of Directors. The Policy defines the Group's risk management principles, objectives, responsibilities, and the organisation and monitoring of the Group's risk management process.
Lumene Group Supplier Self-Assessment Questionnaire	Lumene Group Supplier Self-Assessment Questionnaire is required for direct procurement suppliers with an annual spend over €30,000. The Supplier Self-Audit Questionnaire is sent to suppliers every three years.
Supplier Selection and Approval Process	Supplier Selection and Approval Process describes how Lumene Group selects its suppliers as well as the requirements Lumene Group has for a company to become an approved supplier. All new suppliers must also be screened against sanctions lists before entering into any contractual relationship.
Supplier Evaluation and Co-operation Process	Supplier Evaluation and Co-operation Process describes how Lumene Group evaluates the performance of its suppliers and co-operates with its existing and active suppliers for continual procurement. Evaluations are conducted together with relevant functions (e.g., R&D and QA) and may include audits, self-audits, and supplier score cards (i.e., rating reports). We also monitor supplier performance via EcoVadis supplier rating platform. Corporate social responsibility and sustainability are assessed in the evaluation. Modern slavery risk is a part of the assessment criteria.

Lumene Group Sanction Policy	The purpose of this policy is to ensure that Lumene Group complies with all applicable sanctions laws and regulations thereby mitigating the risk of engaging in transactions with sanctioned individuals, entities, or countries.
------------------------------	--

Other relevant commitments and initiatives

Lumene Group’s sustainability strategy is built on leading in circular beauty, driving climate action, and expanding social accountability. We advance circularity in beauty through innovative packaging and product design, reduce emissions while supporting wetland restoration, and strengthen social responsibility by engaging employees, fostering inclusivity, and ensuring ethical practices across our supply chain to help prevent modern slavery.

Lumene Group has conducted a 4-Pillar Sedex Members Ethical Trade Audit (SMETA) to further deepen the understanding of labour standards, working conditions, and environmental performance across the Group’s operations and supply chains. The SMETA audit is designed to help protect workers from unsafe conditions, overwork, discrimination, low pay, and forced labour.

Our long-term sustainability work was acknowledged in 2024 when LUMENE and CUTRIN became a certified B Corp™. The certification means that an independent, third-party analyst has verified our responsible practices in areas such as energy use, waste management, water consumption, diversity, ethics, and corporate transparency. Certified B Corporations, or B Corps, are companies verified by B Lab to meet high standards of social and environmental performance and to make a public commitment to stakeholder governance.

By becoming a B Corp, Lumene Group is joining a global movement towards a more equitable, inclusive, and regenerative economy. Currently, two of Lumene Group’s brands, LUMENE and CUTRIN, are B Corp certified, with plans to include IDA WARG Beauty in the future. The B Corp certification process evaluates every aspect of a business’s operations, focusing on five key impact areas: governance, workers, community, environment, and customers. Lumene Group achieved a score of 84,5 on the verified B Corp Assessment.

Processes and actions to prevent modern slavery

We understand that our biggest exposure to modern slavery is in our supply chains. Our partner criteria are strict, and partner selection forms the foundation of risk management in our value chain. Lumene Group’s partner selection follows a defined and structured process, and we only operate with companies that are legally compliant and have a good reputation.

We expect that all partners working with us have signed our Partner Code of Conduct, which includes prohibitions against human rights violations and modern slavery. All our direct procurement partners have committed to the Partner Code of Conduct, and a significant portion of our indirect procurement partners have also signed our Partner Code of Conduct. We will continue to work on the matter.

We minimise sourcing from risk countries (according to the Amfori BSCI Country Risk Classification). We also monitor partner performance regularly in a variety of ways, including audits and score cards. Audits can be performed by Lumene Group, by a third party, or by the partner itself as a self-audit.

Lumene Group’s risk management is guided by the Group’s Risk Management Policy which is approved by the Board of Directors and which defines the Group’s risk management principles, objectives, and responsibilities as well as the organisation and monitoring of the

risk management process. Risk management is a systematic activity, aimed at ensuring the comprehensive and appropriate identification, assessment, management, and monitoring of risks, as well as the development of contingency plans.

Lumene Group takes all allegations of suspected human rights violations and shortcomings seriously and thoroughly investigates all cases. We have identified the risks associated with certain raw materials used in our products, such as berries and mica. Following the indications of human trafficking identified by Finnish authorities in 2022 among individual berry suppliers, the matter has remained a key priority for us. In line with our commitment to upholding the highest standards of social responsibility, we made the decision to terminate cooperation with one supplier in 2024 due to non-compliance with our requirements. During 2025, we have strengthened our due diligence processes and supplier engagement. This has included, for example, the introduction of a structured questionnaire for berry suppliers to assess labor practices, working conditions, and compliance with our code of conduct. We have also continued an active dialogue with suppliers and other stakeholders to promote transparency and improvements across the value chain. We remain committed to continuous monitoring, collaboration, and development to ensure responsible sourcing practices.

Employee rights and equality are an essential part of the social responsibility of Lumene Group operations. We continue to work on the complex theme of human rights due diligence and have strengthened collaboration with our suppliers, especially in areas identified as high-risk for human rights violations. We have updated our sourcing processes and initiated a more systematic partner due diligence approach to monitor potential sustainability issues, including the prevention of modern slavery in our partners' operations and supply chains.

As part of our efforts to promote more transparent, attractive, and engaging pay practices in accordance with the EU Equal Pay and Pay Transparency Directive, Lumene Group has implemented a transparent grading, performance management, and remuneration process. Lumene Group pays all employees at least the minimum wage stipulated by the applicable collective agreements or national legislation.

The Lumene Group Remuneration Committee guides, evaluates, and oversees policies and processes related to salary planning, merit process, and employee benefits. The HR team is responsible for implementing fair remuneration practices. When planning changes to the current policies, staff representative bodies are always included. Lumene Group upholds the freedom of association and recognizes the collective bargaining rights of employees.

As part of our commitment to ethical practices and the prevention of modern slavery, we maintain a zero-tolerance policy towards bullying and harassment in all forms. We foster a workplace culture built on respect, dignity, care, and inclusion. All employees, contractors, and partners are expected to uphold these values, and any behaviour that undermines the safety or well-being of individuals is not tolerated. We provide clear reporting channels and support systems to ensure that concerns are addressed promptly and appropriately.

Lumene Group is committed to advancing diversity, equity, inclusion, and belonging (DEIB) and is working to integrate it as a strategic part of its operations. Current initiatives include the development of a two-year DEIB strategy, equity and inclusion training for People Managers, the enhancement of the DEIB Ambassador Group's activities, and the establishment of an external DEIB Advisory Board.

Training and knowledge enhancement

All Lumene Group employees are required to familiarise themselves with and commit to the Lumene Group Code of Conduct, which includes topics on modern slavery and respecting of human rights. It highlights our expectations for all our employees to be aware of how their

work impacts the human rights of individuals within our operations and supply chains. The Code of Conduct sets the standard for ethical behaviour for all our employees and provides guidance on important matters such as working conditions. The Code of Conduct also informs employees on Lumene Group's process for whistleblowing, thereby supporting the detection of possible human rights violations and shortcomings in our operations.

Tracking progress and effectiveness

Lumene Group continuously monitors the signing rate of the Lumene Group Partner Code of Conduct.

Since 2024 we have used EcoVadis as a tool to support supplier sustainability assessments, including modern slavery reporting. Through EcoVadis, we receive structured insights on our suppliers' performance related to modern slavery risks.

Lumene Group's whistleblowing channel provides employees and external parties with the opportunity to raise concerns anonymously and confidentially regarding suspected unethical conduct or illegal activities, including human rights violations. The Audit Committee oversees the Group's whistleblowing practices, and all cases reported through the whistleblowing system are reported quarterly to the Audit Committee and to the Board of Directors. In 2025, no modern slavery issues were reported via the whistleblowing channel, and no human rights-related violations were identified within Lumene Group companies.

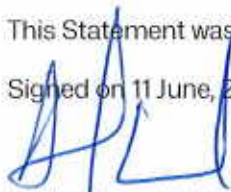
The way ahead

We acknowledge the complex nature of modern slavery and recognise that, in a continually evolving business landscape and supply chain environment, it is essential to remain aware of human rights risks in our operations, both internally and in our partner relationships.

We recognise that preventing modern slavery is a continuous process. We are committed to continually improving our policies, procedures, and practices, and to working with our suppliers and partners to better understand risk areas and mitigate any negative impacts identified.

This Statement was approved by the Board of Directors of Lumene Group on 11 June, 2026.

Signed on 11 June, 2026



Adrian Innergård

CEO, Lumene Group