Code of Conduct of Lightholm Group

Applies to: All employees, contractors and representatives

Effective: May 2026

1. Introduction

As a company, we are committed to upholding high ethical and professional standards in everything we do. To achieve this goal, we have established a comprehensive Code of Conduct policy that applies to all employees, contractors, and representatives of our organization.

Our Code of Conduct sets forth the principles and values that guide our business practices and interactions with others. It covers a wide range of topics, including but not limited to ethical behaviour, workplace safety, confidentiality, environmental protection, anti-discrimination, and fair compensation.

We align our Code of Conduct with internationally recognized standards, including the UN Guiding Principles on Business and Human Rights, ILO core labor standards, and applicable EU directives on corporate sustainability and due diligence.

By adhering to this Code of Conduct, we demonstrate our commitment to maintaining a positive and productive work environment, as well as our dedication to being a responsible and trustworthy member of the communities we serve.

We encourage all employees to familiarize themselves with our Code of Conduct and to always act in accordance with their principles and values.

This Code applies across all jurisdictions in which Lightholm operates and sets minimum standards; where local law imposes stricter requirements, those shall prevail.

2. Legal Compliance

We shall comply with all applicable laws and regulations in the countries where we operate.

Lightholm expects all employees to comply with all applicable laws, regulations, and ethical standards.

Employees must not engage in any conduct that violates the law or the company's policies and procedures.

Employees have a duty to report suspected violations through designated reporting channels without fear of retaliation.

3. Human Rights and Labor Standards

Lightholm is committed to respecting internationally recognized human rights and avoiding complicity in human rights abuses.

We explicitly support:

- Freedom of association and the right to collective bargaining
- Elimination of forced labor, modern slavery, and human trafficking
- Abolition of child labor
- Non-discrimination and equal opportunity

Lightholm prohibits all forms of discrimination based on gender, gender identity, age, religion, ethnicity, nationality, disability, sexual orientation, marital status, political beliefs, or any other protected characteristic.

We are committed to fair wages and working conditions that meet or exceed legal minimums and industry standards.

4. Workplace Conduct and Inclusion

Lightholm is committed to creating a respectful, inclusive, and safe working environment.

Harassment, bullying, violence, or any form of inappropriate conduct will not be tolerated.

Employees are expected to treat each other with respect and professionalism at all times.

We actively promote diversity, equity, and inclusion across our workforce and business relationships.

5. Health and Safety

We are committed to maintaining a safe and healthy work environment.

We comply with all occupational health and safety laws and implement preventive measures to minimize risks.

Employees must follow all safety procedures and report hazards immediately.

6. Environmental Responsibility

We comply with all environmental laws and regulations in the countries where we operate.

We are dedicated to continuous improvement in environmental performance.

We commit to reducing environmental impact, including emissions, waste, and resource consumption, and to supporting sustainable development.

We prohibit activities that cause significant environmental harm, including pollution of air, water, or soil.

Where applicable, we comply with international environmental conventions, including those related to hazardous substances and waste management (e.g., Basel Convention, Stockholm Convention, Minamata Convention).

7. Business Integrity and Anti-Corruption

Lightholm has zero tolerance for bribery, corruption, facilitation payments, or unethical business practices.

Employees must not offer, give, or accept any improper advantage.

Conflicts of interest must be disclosed and managed transparently.

8. Confidentiality and Data Protection

Employees must protect confidential company information and respect data privacy.

We comply with applicable data protection laws, including GDPR where relevant.

9. Reporting and Whistleblowing

Employees are encouraged to report concerns or violations.

Lightholm ensures confidential reporting channels and prohibits retaliation against whistleblowers.

On site feedback boxes are available or email: lh.complaints@lightholm.com

10. Implementation and Accountability

This Code applies to all employees, contractors, and business partners.

Suppliers and partners are expected to adhere to equivalent standards, and Lightholm reserves the right to assess compliance.

Violations of this Code may result in disciplinary action.

Signature

Sven Aabreldaal

For and on behalf of Lightholm Group