

Responsible Sourcing Policy of Lightholm Group

Applies to: All raw material procurement
Effective: May 2026

1. Purpose & Scope

Lightholm is committed to responsible and ethical sourcing of all raw materials used in the manufacture of our outdoor, industrial, and commercial LED luminaires. This policy applies to all raw material procurement and governs our relationships with sub-suppliers who provide aluminum, glass, rubber, iron, copper, and other materials essential to our products.

All materials are sourced through a network of sub-suppliers selected and managed directly by Lightholm. This policy sets out the standards we expect of ourselves and our supply chain partners.

2. Supplier Selection & Due Diligence

We assess sub-suppliers based on their ability to meet our quality, ethical, and environmental standards. Our due diligence process includes:

- Evaluation of new suppliers prior to engagement against defined quality and ethical criteria
- Ongoing review of existing suppliers to ensure continued compliance with this policy
- Assessment of environmental and social practices as part of supplier onboarding

3. Ethical & Legal Compliance

We require all sub-suppliers to operate in full compliance with applicable laws and regulations, including those relating to labor rights, environmental protection, and anti-corruption. Lightholm does not knowingly source materials from suppliers involved in human rights violations, forced labor, child labor, or any illegal practices.

4. Environmental Responsibility

Lightholm prioritizes materials and suppliers that support our commitment to energy efficiency and environmental sustainability. These values are central to our product philosophy and reflected in our eco-friendly product range. We encourage suppliers to minimize waste, reduce emissions, and adopt sustainable practices in their operations.

5. Transparency & Traceability

We maintain visibility over our supply chain and expect sub-suppliers to provide relevant documentation and transparency regarding the origin and processing of materials supplied to us. Suppliers are expected to make information available upon request to support our audit and compliance obligations.

6. Conflict Minerals

Lightholm exercises due diligence to avoid sourcing conflict minerals in accordance with OECD Due Diligence Guidance and applicable regulations. We expect our sub-suppliers to apply equivalent standards within their own supply chains.

7. Remediation & Grievances

Where Lightholm identifies a sourcing-related breach of this policy, we are committed to working with the relevant supplier on a corrective action plan. Concerns regarding sourcing practices may be raised through our designated grievance channel, managed by two designated managers, and all reports are investigated without fear of retaliation.

8. Continuous Improvement

Lightholm is committed to continuously improving our sourcing practices. We engage with suppliers to raise standards across our supply chain and will update this policy as our business, regulatory environment, and best practices evolve.

9. Governance & Review

This policy applies to all raw material procurement activities undertaken by Lightholm and its subsidiaries. It is overseen by Lightholm management and reviewed annually or following any material change in our supply chain or applicable regulatory requirements.

10. International Standards Reference

This policy is informed by the following frameworks:

- UN Guiding Principles on Business and Human Rights
- OECD Due Diligence Guidance for Responsible Supply Chains
- ILO Core Labor Conventions
- EU Corporate Sustainability Due Diligence Directive (CSDDD)
- Basel, Stockholm, and Minamata Conventions (where applicable)

Signature



SVEN AABRELDAL

Sven Aabreldaal
For and on behalf of Lightholm Group