

# Supplier Code of Conduct for Lightholm Group

*Applies to: All suppliers, subcontractors and business partners*

Effective: May 2026

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As a company, we are committed to upholding high ethical and professional standards in everything we do.

This Supplier Code of Conduct defines the minimum standards that all suppliers, subcontractors, and business partners of Lightholm must comply with.

Our Code of Conduct sets forth the principles and values that guide our business practices and interactions with others.

This Code is aligned with internationally recognized standards, including the UN Guiding Principles on Business and Human Rights, ILO core conventions, OECD Guidelines for Multinational Enterprises, and applicable EU sustainability and due diligence regulations.

## 1. Statutory requirements

The supplier shall comply with the national laws in the countries where they operate.

Where this Code sets stricter requirements than local legislation, the supplier shall comply with this Code.

The supplier shall immediately inform Lightholm of any conflicts between this Code and applicable laws.

## 2. Protection of the environment

The supplier shall:

- Take necessary measures to avoid pollution
- Assess environmental impacts
- Establish environmental procedures
- Actively reduce environmental impact, including emissions, waste, and resource consumption

- Avoid harmful soil, air, and water pollution and excessive resource use  
Comply, where applicable, with international environmental conventions (e.g., Basel, Stockholm, Minamata)

### 3. Ethical conduct

The supplier shall act with integrity.

Lightholm does not accept fraudulent behavior.

The supplier may not participate in corruption, bribery, or embezzlement.

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

The supplier shall establish processes to prevent, detect, and address corruption risks.

Conflicts of interest must be disclosed and managed transparently.

The supplier shall handle personal data according to applicable regulations.

The supplier shall comply with applicable data protection laws, including GDPR where relevant.

### 4. Freedom of association and collective bargaining

The supplier shall respect employees' rights to freedom of association and collective bargaining in accordance with ILO conventions.

### 5. Discrimination and inclusion

The supplier should ensure a workplace free from discrimination, harassment, bullying, or any form of inappropriate behavior.

Equal treatment shall apply regardless of gender, age, ethnicity, nationality, disability, religion, sexual orientation, or any other protected characteristic.

### 6. Fair compensation

Wages shall meet or exceed legal minimum standards and industry benchmarks.

Compensation shall be sufficient to meet basic living needs, where reasonably applicable within the local economic context.

## 7. Working hours

Working hours shall comply with ILO standards and applicable laws.

Overtime must be voluntary, limited, and compensated fairly.

## 8. Health and safety

The supplier shall provide a safe and healthy working environment in line with applicable laws and international standards.

Risk assessments must be conducted regularly, and preventive measures implemented.

Employees shall have the right to remove themselves from dangerous situations without retaliation.

## 9. Employment conditions

Employment must be based on documented, transparent, and legally compliant agreements.

Suppliers shall not use employment structures (e.g., subcontracting, temporary contracts) to undermine workers' rights.

## 10. Child labor

Child labor is strictly prohibited in accordance with ILO standards.

## 11. Young workers

Young workers must be protected from hazardous work and conditions that interfere with education or development.

## 12. Forced labor and modern slavery

The supplier shall not engage in or benefit from forced labor, modern slavery, human trafficking, or involuntary work.

Employees must be free to leave employment with reasonable notice.

## 13. Accommodation (if applicable)

Any accommodation provided must meet health, safety, and dignity standards.

## 14. Conflict minerals

The supplier shall exercise due diligence to avoid sourcing conflict minerals and comply with OECD guidelines and applicable regulations.

## 15. Business partner responsibility

The supplier shall ensure that its own suppliers and subcontractors comply with equivalent standards.

## 16. Reporting and whistleblowing

The supplier shall provide mechanisms for employees to report concerns confidentially and without fear of retaliation.

Lightholm employees and supplier employees may report concerns through designated reporting channel via emails to [lh.complaints@lightholm.com](mailto:lh.complaints@lightholm.com)

## 17. Monitoring, audits, and enforcement

Lightholm reserves the right to inspect supplier facilities.

Suppliers must provide relevant documentation upon request.

Failure to comply may result in corrective action plans, suspension, or termination of the business relationship.

## 18. Implementation and accountability

Suppliers are expected to actively implement this Code through policies, training, and internal controls.

## 19. International standards reference

(keep your list but strengthen wording)

This Code is based on international frameworks including:

- UN Guiding Principles on Business and Human Rights
- ILO Conventions
- OECD Guidelines
- UN Global Compact
- Relevant EU regulations

Signature



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*For and on behalf of Lightholm Group*