

LumenRadio Group Supplier Code of Conduct

INTRODUCTION

LumenRadio Group (i.e. LumenRadio AB and its subsidiaries) is committed to responsible and sustainable business practices. Our core values of Reliability, Innovation, Simplicity and Energy (RISE) guide our actions and decisions. This Supplier Code of Conduct outlines the standards we expect from our suppliers regarding legal compliance, business ethics, human rights, labor standards, environmental responsibility, and health and safety.

1. LEGAL COMPLIANCE

Suppliers must operate in full compliance with all applicable laws, directives and regulations, including sanctions issued by the UN, EU or US. This Supplier Code of Conduct does not replace legislation, and if there is a conflict, the legislation takes precedence. Suppliers are expected to adhere to the highest standards of integrity and fair dealing.

2. BUSINESS ETHICS

- **Anti-Corruption:** Suppliers must not engage in any form of corrupt activities, including bribery, conflicts of interest, fraud, extortion, embezzlement, and unlawful kickbacks. Suppliers must implement their own whistleblower policy and process.
- **Competition and Antitrust Laws:** Suppliers must comply with all applicable competition and antitrust laws, avoiding practices such as price fixing, market sharing, bid rigging, or customer allocation.
- **Data Protection:** Suppliers must follow applicable data protection laws and regulations, ensuring the confidentiality and security of all data.
- **Conflict of Interest:** Suppliers must avoid conflicts of interest in their dealings with LumenRadio – this involves excluding all possibly biased personnel (e.g. any close relative to a LumenRadio employee) from inter-company activities.
- **Responsible Business Practices:** Suppliers must avoid excessive business entertainment that could inappropriately affect business decisions and must not participate in money laundering or financing of terrorist activities.
- **Transparency:** Suppliers must maintain transparent and accurate books and records to demonstrate compliance with this Supplier Code of Conduct and applicable laws, such as the EU CSRD Directive.

3. HUMAN RIGHTS AND LABOR STANDARDS

- **Child Labor:** Suppliers shall not employ individuals below the minimum age permitted by local law. In no case shall children under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest, be employed. Suppliers must comply with all applicable laws and regulations regarding child labor, including the International Labor Organization (ILO) conventions. Additionally, suppliers must ensure that no person under the age of 18 is employed in hazardous work that could jeopardize their health, safety, or morals.

- **Forced Labor:** Suppliers must not use any form of forced or bonded labor, including prisoners or illegal workers.
- **Freedom of Association:** Suppliers must respect the rights of employees to freely associate and bargain collectively.
- **Non-Discrimination:** Suppliers must provide a work environment free from discrimination and harassment, ensuring equal opportunities for all employees.
- **Working Hours:** Suppliers must comply with local laws regarding working hours, overtime and related compensation.
- **Living Wages:** Suppliers must ensure that wages paid for a standard working week meet at least the statutory minimum wage, prevailing industry wage, or wage negotiated in collective bargaining agreements, whichever is higher.
- **Ethical Recruitment:** Suppliers must follow ethical recruitment practices, ensuring no recruitment fees are charged to employees and that written contracts are provided.

4. ENVIRONMENTAL RESPONSIBILITY

- **Environmental Compliance:** Suppliers must comply with all applicable environmental laws and regulations, obtaining and maintaining necessary permits and licenses.
- **Sustainability:** Suppliers are encouraged to develop and implement environmentally friendly technologies and practices, striving to reduce resource consumption, waste, and pollution. Suppliers are expected to measure and follow up scope 1, 2 and 3 emissions, as defined in the GHG Protocol.
- **Biodiversity:** Suppliers should understand and mitigate their impact on biodiversity, promoting reforestation, conservation and other similar actions improving conditions in their local environment.
- **Resource Efficiency:** Suppliers must monitor, track, and document the use of natural resources, such as water, energy, and raw materials, and strive to improve efficiency.

5. HEALTH AND SAFETY

- **Safe Work Environment:** Suppliers must provide a safe and healthy work environment – fulfilling all local laws and regulations and employ a process for identifying and managing occupational health and safety hazards within their operations. Suppliers must also provide adequate protective clothing and equipment for all their employees.
- **Building and Fire Safety:** Suppliers must ensure that buildings and equipment meet safety standards, with clearly marked emergency exits and regular safety drills.
- **First Aid and Medical Care:** Suppliers must provide adequate first aid equipment and ensure access to medical care for work-related injuries.
- **OHS Training:** Suppliers must ensure that their personnel receive appropriate occupational health and safety training.
- **Emergency Preparedness:** Suppliers must implement emergency plans, fire safety, and emergency response procedures, including regular training and drills.
- **Product Safety:** Suppliers must ensure that their products fulfill applicable regulations regarding product safety from a component and raw material perspective – including, but not limited to, REACH, RoHS and PFAS requirements. Should LumenRadio's item

specifications and/or purchase order requirements prevent suppliers from doing this, then this should be communicated back to LumenRadio together with an ambition to find an alternative compliant solution.

6. RESPONSIBLE SOURCING

- **Conflict Minerals:** Suppliers must ensure that the sourcing of minerals does not contribute to human rights abuse or conflict. Suppliers must follow the OECD Due Diligence Guidelines and provide information on the use of conflict minerals. LumenRadio will never specify the geographic origin of a certain compound (e.g. gold), giving suppliers freedom to influence this.
- **Sustainable Materials:** Suppliers must ensure that raw materials are sourced sustainably and do not harm the environment or local communities.

7. IMPLEMENTATION AND MONITORING

LumenRadio will monitor the implementation and adherence to this Supplier Code of Conduct. Compliance will be assessed regularly, and actions will be required from Suppliers to address non-compliances. Assessments may be carried out through Supplier self-declaration and/or on-site audits (by LumenRadio or a third party). Repeated or unaddressed violations may result in a reduction, or ultimately the termination, of the business relationship.

RAISING CONCERNS

Suppliers and their employees are encouraged to report any concerns regarding non-compliance with this Supplier Code of Conduct to LumenRadio through designated channels, e.g. our Whistleblower Portal accessible from our homepage.

This Supplier Code of Conduct is hereby confirmed.

Date and place:

Signature and stamp:

Name:

Title:

Company: