

# Lightware Business Partner Code of Ethics

At our company, we are unwavering in our commitment to ethical business practices, sustainability, and social responsibility. To bring these values to life, we hold our business partners, which include suppliers, service providers, consultants, and others, to the same high standards. In this Code, we outline the ethical principles that we expect our business partners to uphold.

These standards apply to all business partners, encompassing third parties along with their employees or agents who supply products or services to Lightware.

## Ethical Business Conduct

We anticipate that our partners will consistently demonstrate ethical and fair business conduct in all of their dealings.

## Human Rights

“At Lightware, we are unwavering in our dedication to upholding the human rights of all our stakeholders.”

Therefore, we expect our business partners to honour human rights, encompassing civil, political, economic, social, and cultural rights, in their operations. This includes the right to life, liberty, security of person and health, the right to be free from all forms of forced or compulsory labour, the right to be free from child labour, the right to a fair wage and a standard of living, and the right to freedom of expression.

## Fair Employment Practices

Our business partners are prohibited from tolerating any form of forced, bonded, or child labour. They must be committed to fair employment and remuneration practices in accordance with applicable laws.

## Avoiding Discrimination

Our business partners must refrain from any form of discrimination based on characteristics or situations that are irrelevant to professional matters, including but not limited to gender, marital status, age, ethnicity, colour, religious or political beliefs, disability, or sexual orientation.

## Avoiding Harassment

Our business partners must avoid engaging in any behaviour that others may perceive as offensive, intimidating, humiliating, malicious, or insulting.

## Health and Safety

Our business partners must always adhere to relevant health, safety, and environmental laws and regulations, regardless of their primary activities.

## Environment

Our business partners are obligated to minimize the use of raw materials and resources in the production of their products and services to reduce environmental impacts. They should manage waste generated in compliance with legislation and actively promote sustainable production and environmentally friendly practices while adhering to applicable environmental laws.

## Communications

Our business partners are expected to maintain the highest standards of conduct in both verbal and written communications, characterized by mutual respect.



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## Avoiding Conflict of Interest

Business Partners are expected to avoid and disclose situations that create or appear to create conflicts of interest with our Group.

## Information Security

Our business partners are required to maintain the confidentiality of all business data in line with applicable laws and confidentiality agreements. They must implement suitable security measures to ensure data confidentiality, integrity, and availability to authorized parties.

## Protection of Personal Data

Our business partners must comply with personal data protection laws, collecting and processing only necessary personal data and providing adequate information to data subjects in line with the law.

## Protection of Assets

Business partners have a duty to protect the tangible and intangible assets owned by Lightware and its customers.

## Ensuring Financial Transparency

Business partners are required to respect tax legislation and uphold the principles of financial transparency.

## Avoiding Insider Trading

Business partners must not unlawfully use inside information for financial gain or share inside information with unauthorized individuals.

## Gift Giving

Business partners must refrain from offering high-value gifts if doing so could create an actual or perceived conflict of interest, compromise the integrity of employees, unduly influence employee decisions, or lead employees to act in a manner inconsistent with their duties.

## Ensuring Fair Competition

Business partners are prohibited from engaging in any activity aimed at fixing prices, forming cartels, abusing dominance, or other illegal conduct. They must operate in line with fair competition rules and applicable competition law.

## Anti-Corruption

Business partners must commit to conducting business free from all forms of corruption and bribery, including bribery, influence peddling, and other unfair practices.

## Avoiding Money Laundering

Business partners must take all available measures to prevent money laundering.

## Products and Services

Business partners should strive to deliver quality and safe products and services, meeting the highest standards of quality and safety based on product or service specifications. They must not intentionally or negligently compromise expected high quality.

## Conclusion

Lightware's business partners are expected to demonstrate their dedication to ethical principles by adhering to this Code and taking appropriate actions based on their size and risk. If you wish to report unethical behaviour, please refer to our [Whistleblowing procedure](#).

