



Trust Charter

Luminous'
Code of Conduct

Trust Charter, Luminous' Code of Conduct

We want trust to power all our interactions with stakeholders and all our relationships with customers, shareholders, employees and the communities we serve, in a meaningful, inclusive and positive way.

Luminous's purpose is to empower all to make the most of our energy and resources, bridging progress and sustainability for all.

We believe that trust is a foundational value. First, trust is earned, both by individuals and by organizations. Second, trust serves as a compass, showing the true north in an ever more complex world. Third, trust is core to our Environment, Sustainability and Governance commitments.

We want trust to power all our interactions with stakeholders and all our relationships with customers, shareholders, employees and the communities we serve, in a meaningful, inclusive and positive way. Hence we created this Trust Charter to act as our Code of Conduct and demonstrate our commitment to ethics, safety, sustainability, quality and cybersecurity, underpinning every aspect of our business and our willingness to behave and respond respectfully and in good faith to all our stakeholders.

It is both our individual and collective responsibility to comply and respect laws and regulations, to apply our Luminous Policies and to uphold strong ethical principles to earn trust at all times.

As trust fuels empowerment, each section of the charter states clear do's and don'ts and provides clear references to relevant policies and procedures (which are adapted to meet local legal requirements when necessary).

Our Code of Conduct applies to everyone working at Luminous or any of our subsidiaries. Hence, we train our employees yearly on the Trust Charter and regularly ask that they confirm their acceptance of its content.

What you can do if in doubt or need to raise a concern

We are encouraged to use our judgment to determine the best course of action, but there may be times when we face ethical dilemmas or are unsure and need guidance to better understand how to act. In such cases, our network of Ethics Delegates is available for advice and support.

Our alert system  [Trust Line](#) allows our employees and our external stakeholders to raise any concerns. When an alert is raised, it is subject to a thorough and confidential investigation, protecting all individuals involved. The findings of such investigations are then submitted to the relevant governing committees, who decide on the appropriate action to be taken.

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Exemplify Our Leadership Expectations

01

TRUSTED TEAMS



Leadership is recognition of experience and expertise, but also a responsibility.

Our leaders set the tone and exemplify our culture. Beyond our core values, leaders throughout our organization must live up to, and actively demonstrate, our leadership expectations. In today's new normal, leaders need to guide their teams to navigate the fast-paced, ever-changing work environment. The marker of a great leader is in delivering meaningful business impact in an inclusive manner, with an empowered team.



- Inspire our strategic vision for the future, built on digital transformation
- Build teams with diverse skills, backgrounds and profiles
- Focus on serving customers and winning, over beating KPIs
- Dare to disrupt and innovate in our markets and with our teams
- Champion new ways of working, built on digital, green, agile, flexible and hybrid work practices
- Ensure the psychological safety of teams through trust and empowerment
- Coach teams to learn new skills and grow their careers to the fullest
- Act like owners, taking responsibility for our company's integrity, when leading teams and reporting incidents



- Lose sight of our greater mission and ambition while pursuing our day-to-day activities
- Micro-manage our teams
- Resist change
- Complicate situations with unnecessary or inefficient processes
- Ignore signs of ethical or harassment violations

Create Equal Opportunities



Our Diversity, Equity and Inclusion ambition aims to offer equal opportunities to everyone, everywhere.

We want our employees — no matter who they are, or where they live in the world— to feel uniquely valued and safe to contribute their best, free from harassment, victimization and discrimination. A diverse and inclusive workforce yields stronger innovation and performance. Equal opportunities are strengthened through transparent and equitable access to information and tools that support growth and development.



- Foster an open and safe work environment so that everyone can share their perspective and authentically be themselves,
- Encourage employees to take ownership of their careers and take advantage of different platforms and programs to grow,
- Ensure equal pay for equal work and implement fair and equitable pay practices,
- Demonstrate inclusive behavior by identifying and addressing our own biases,
- Build and support a culture of respect and speak up when we see discrimination or harassment of any kind.



- Make assumptions about people or their intentions,
- Let biases drive decisions
- Accept or allow intimidation, discrimination, or disrespect,
- Tolerate degrading comments on race, sex, ethnic and national origin, religion, political opinion, age, medical status, marital status, disability, pregnancy, sexual orientation, gender, or gender identity

Harness the Power of All Generations

03

TRUSTED TEAMS



We seek to create an open and supportive workplace where all employees are ‘talent’ and empowered to grow to their full potential, developing new skills and building their careers for today and tomorrow.

We want to inspire and attract the next generation of talent by building strong relationships with universities, campuses and underprivileged communities. Our more experienced talents can also lead, coach and share their knowledge. By leveraging the power of all generations, we can create a workforce with unrivaled skills and experience.

- ✔
 - Foster learning, upskilling and development for all, whatever career stage employees are at,
 - Drive employees’ development through career conversations and platforms, such as the Open Talent Market,
 - Facilitate open discussions by dedicating time to late-career conversations,
 - Invest in mutual mentoring relationships to bridge knowledge and skill gaps,
 - Commit to investing in and hiring ‘next generation’ talented recent graduates, interns and apprentices,
 - Support digital upskilling across all generations, in response to business and market needs.
- ✘
 - Withhold organizational information that may hinder effective collaboration and business continuity, such as support with succession plans
 - Limit career progression based on assumptions and/or stereotypes



LUMINOUS

Champion Well-Being and New Ways of Working



TRUSTED TEAMS

04

In today’s global, digital and ever-changing environment; agile, inclusive, efficient, trusted, and empowered interactions between colleagues, partners and customers are more vital than ever.

The emotional, physical, social and mental well-being of our people is important and can be sustained by purposefully building a more resilient organization in which people can set boundaries and perform at their best. As a company, we are embracing new — more digital, agile and smarter — ways of working that drive higher performance, improve well-being and offer a more equitable and inclusive work environment.



- Implement Flexibility@Work practices to better manage our time at work, or when away from it
- Adopt a digital-first mindset, implementing new ways of working to connect with customers, partners and teams
- Strive to enhance well-being, physical and mental health and develop smarter ways of working to free up people’s time and save energy
- Focus on results and outcomes instead of placing more value on time connected at work



- Judge people’s flexibility needs, whatever their situation
- Ignore signs of distress, stress or burn-out
- Underestimate the value of rest and recovery

Be S.A.F.E First



We are all empowered to look after our own safety and the safety of others.

We never compromise on safety. We have our 'S.A.F.E. First' rules that remind us to pause and reflect on our own safety before beginning any task, analyzing Self, Activity, Facility, and Environment. We make the safe choice, every day, everywhere.

- ✔
 - Assess the risk before starting any activity
 - Only carry out tasks that we are qualified to perform
 - Stop work when situations are unsafe
 - Report all opportunities to continuously improve our health and safety, and share solutions
 - Look out for the safety of our colleagues, contractors, and customers
 - Follow the Safety Golden Rules for machine, electricity, road, power industrial trucks and falls
- ✘
 - Interfere with or bypass safety control measures
 - Become complacent about unsafe behavior and situations
 - Lay blame if someone speaks up about safety hazards



TRUST WITH CUSTOMERS AND PARTNERS

Strive for High Quality

01

TRUST WITH CUSTOMERS AND PARTNERS



Our priority is to delight our customers with an outstanding end-to-end experience. Quality is every customer’s right and every employee’s responsibility.

Experience is the most important driver for customers, defining the business relationships they sustain with suppliers and partners. Our customers place trust in our resilient, highly personalized, multi-channel experience, and the superior quality of our products. To ensure this, we act with agility, discipline, and good business sense throughout the offer life cycle from creation to supply, manufacturing, delivery, when in operation and when being serviced.



- Empower our people to put customers first, by prioritizing their interests, anticipating their needs, reacting quickly and always going the extra mile through a consistent experience at every touchpoint
- Ensure our products’ reliability, safety and cybersecurity to secure customers’ business continuity and protect their people, assets and data
- Guarantee that our digitized end-to-end value chain drives resiliency at each touchpoint when customers seek to “get quotations, place and follow orders, get delivered, or get technical support”
- Make sure our analytics, processes and people make the difference, to deliver the ultimate customer experience
- Listen carefully and continuously, turning insights into value via end-to-end improvement
- Respect our promises to customers by not compromising on quality at any point in the lifecycle of our offers



- Delay removing internal barriers to resolve quality issues
- Lay blame if an employee speaks up about a customer issue

LUMINOUS
02

Strive for Resiliency

TRUST WITH CUSTOMERS AND PARTNERS



Resiliency is the capacity to quickly recover from difficulty. We use a risk-centric framework to reduce our exposure to technological, environmental, process, geo-political. and health risks that disrupt our business.

We have standardized issue-escalation processes in place, as well as risk assessment and business impact analysis. We are prepared to manage any crisis with disaster recovery and business continuity plans, if needed. Our local leaders are empowered to assess risks, increase their preparedness and handle all types of crises with a rapid and effective response, thanks to processes and tools in place to support them.

- Respond to emergencies by focusing on protecting lives, minimizing damage to assets and any impact on both the immediate area and the wider environment
- Focus on keeping and/or getting our critical operations running in times of crisis, with tools, processes, roles and responsibilities for immediate and effective response
- Strive to continuously improve our response and recovery management, learning from simulations and real events

- Assume that resiliency planning is somebody else's responsibility

Reach the Highest Standard for Cybersecurity, Data Privacy and Protection

a) Excel at Cybersecurity

TRUST WITH CUSTOMERS AND PARTNERS

03a

Cybersecurity is an essential business imperative for us, our ecosystem and the industry at large.

Our strategy encompasses people, processes, and technology across the operational lifecycle. We align with the ISO Framework, follow globally recognized standards¹ and comply with certified 'secure by design' development processes, to safeguard our digital ecosystem and deliver secure offers, systems, solutions and services.

- ✔
 - Comply with regulations and coordinate with law enforcement, when required
 - Assess and continuously seek to improve our cybersecurity posture (and the cybersecurity posture of our ecosystem)
 - Help our customers to improve their cybersecurity posture enabling them to strengthen security protection and evaluate risks stemming from suppliers by applying defined standards and frameworks
 - Promote cybersecurity through trusted and transparent information sharing; provide support against cyber threats and attacks
 - Collaborate with cross-industry organizations² to secure value chains and strengthen digital trust
 - Provide clear communication and public statements on Luminous and its ecosystem's cybersecurity posture, if required
- ✘
 - Consider that cyber risks are purely technical issues or separate them from other enterprise risks
 - Assume that our suppliers, partners or external organizations will manage cyber risks for us

¹Such as ISO 27001:2013

b) Honor Data Privacy and Protection



TRUST WITH CUSTOMERS AND PARTNERS

03b

We recognize the right to privacy and protection of personal information as a fundamental human right. We consider fairness, transparency, data integrity, quality, security, and trust as core principles of how we handle data and use it in the products, systems and services we deliver.

By promoting a data protection culture, we are committed to spreading these principles throughout our organization, in our R&D processes and to continuously improve our products and customers' experience. We are set up to ensure resilient data handling and storage processes and comply with relevant regulations. We make it a point to responsibly source, process and share data.



- Process personal information fairly and transparently with appropriate security safeguards
- Adopt a 'privacy by design' approach in our R&D processes
- Work with suppliers or vendors that comply with data-protection requirements
- Protect personal information and respect individuals' rights
- Run compliance controls and implementation programs



- Allow unauthorized access, unrestricted sharing, unlawful or unsecured use of personal information
- Violate human rights and civil liberties by misusing our knowledge

c) Use AI and Data Science responsibly

We believe digital resources must be used for the good of humanity and are convinced that Artificial Intelligence (AI), data science and digital innovation can generally bring substantial benefits to society.

We leverage digital technologies to benefit our customers and employees for a sustainable future, based on human-centered design with a 'do no harm' oversight.



- Promote the use of AI and technology, while taking well-being, dignity, integrity, transparency, ethics and sustainability into account
- Ensure fairness and accountability in the use of AI to anticipate potential bias and avoid discrimination
- Implement privacy and security safeguards when leveraging AI and other digitally innovative systems
- Implement appropriate governance and raise awareness on the possible impact of AI
- Develop algorithmic transparency and other automated decision-supporting digital technologies
- Act fairly when making decisions based on AI algorithms, addressing potential bias, aiming for equal treatment and respecting individuals' legal rights



- Implement or use algorithms that impair unbiased decision-making

Prohibit any Form of Corruption

04

TRUST WITH CUSTOMERS AND PARTNERS



We uphold a zero-tolerance policy for corruption and bribery, in compliance with all laws, such as but not limited to the French Sapin 2 Law, the US Foreign Corrupt Practices Act, The Prevention of Corruption Act, 1988, and the UK Anti-Bribery Act.

Clear boundaries and efficient processes ensure that risks are managed effectively and that all employees are empowered to act to avoid any form of corruption. Any compromise on such principles can be harmful to employees, to Luminous and the communities it serves.

- | | |
|---|--|
| <ul style="list-style-type: none"> ✔ Highlight our zero-tolerance for corruption and money laundering, internally and when dealing with third parties • Ensure that all given or received gifts, invitations, donations, hospitality packages and sponsoring activities are lawful, transparent, appropriate, approved as per our policies, and properly documented in our records • Immediately inform our manager when aware of any action contrary to policies • Organize our marketing events and manage customer invitations in line with our policies, with a clear business purpose • Apply our commercial policy with acceptable and transparent rebates and discounts, justified by the work delivered • Follow all accounting, record-keeping and financial reporting requirements applicable to payments, particularly in compliance with legal and/or regulatory anti-corruption provisions | <ul style="list-style-type: none"> ✘ Give or accept bribes, whatever their form, monetary or in-kind, such as monetary gifts or payment of travel • Facilitate payments to secure or speed up routine legal or government-related actions, such as issuing permits or releasing goods held in customs • Grant unlawful benefits to any third party to speed up a process or gain favor • Invite public officials without approval, as per our policies and procedures • Engage in or cover up corrupt practices or suspicious/illegal financial transactions, including those potentially perceived as money laundering • Approve any payment without relevant authorization according to our Chart of Approval and without checking the recipient • Accept any undue solicitation from third-parties |
|---|--|

Require Third-Party Integrity

05

TRUST WITH CUSTOMERS AND PARTNERS



Our relationships with third parties, such as customers, business partners, distributors, suppliers, subcontractors, or business agents are built on integrity and trust.

We expect third parties to manage ethics and compliance risks according to their level of exposure, abiding with anti-corruption and export control laws and regulations, and in respect of international human and labor rights, such as eliminating forced labor, child labor and discrimination. We ensure that our business is not used to launder money from criminal activities.



- Only approve third parties following internal ethics and compliance due diligence according to our Chart of Approval and the appropriate monitoring of the related risks through training, audits or certification
- Ensure third-party contractual provisions are adapted to any identified risks
- Enforce our Supplier's Code of Conduct
- Ensure third-parties' scope of work is contractually defined, their performance effective, and payment proportionate to industry and local standards
- Ensure that payments to third parties, especially business agents, are accurate and auditable
- Ensure that our activities are not used for money laundering



- Enter into a third-party relationship without defining the scope of work
- Allow third parties to give bribes or make questionable payments on our behalf
- Use or pay business agents unless approved as per the Business Agents policy
- Pay a third-party without following the contractual payment terms, an invoice or prior approval according to our Chart of Approval

Avoid Conflicts of Interests



TRUST WITH CUSTOMERS AND PARTNERS

06

A Conflict of Interest situation occurs when an employee’s personal interest potentially competes with – or is in opposition to – the interests of Luminous.

Situations of conflict of interest can unconsciously influence a person’s judgment and challenge their integrity. We recognize and respect that employees may take part in legitimate financial, business and other activities beyond their jobs at Luminous. However, these activities cannot conflict with their responsibilities to Luminous.



- Disclose potential, apparent or actual conflicts of interest and comply with related mitigation actions
- Disclose involvement with, or financial stakes in any organization related to our competitors, customers or suppliers, and explain how this allows us to influence decisions in its favor
- Consult with our Ethics Delegates or HR Business Partners in case of doubt



- Hide information on any conflict of interests
- Debate or participate in internal decision-making processes, should a conflict of interest arise
- Allow decisions or actions to be influenced by favoritism, nepotism or preferential treatment
- Help or work for our competitors
- Engage in or have direct or indirect interests in any other activity, business or employment that interferes in any way with our responsibilities and availability to Luminous

Uphold Fair Competition

When companies compete in an equal and fair manner, trust is guaranteed.

This ensures more innovation in markets, enabling companies to meet consumers' needs with better prices and to drive sustainable growth. As an ethical company, we refrain from any conduct which violates, or can be perceived as violating, competition laws or regulations.



- Set our commercial policy, prices and discounts independently from competitors, manufacturers and distributors
- Act fairly with our partners
- Act promptly when we receive confidential information from or about our competitors, ceasing all communication and reporting any incidents to our legal teams



- Share any confidential information with competitors
- Split up and share business opportunities, territories or markets with competitors
- Consult and agree with competitors on margins or the timing of price or margin increases
- Intentionally communicate using language that could be considered misleading from a legal standpoint
- Ask new hires to share confidential information about competitors for whom they used to work
- Request confidential information from former Luminous employers who currently work for competitors
- Encourage customers or suppliers to breach contracts with competitors

Abide by Export

Controls and Sanctions



Export Control involves the transfer of goods, services and technology within a country, between countries or nationals.

As a global business, with operations and business activities conducted across many countries, it is important to comply with applicable export control laws and sanction regulations, as well as enhancing supply chain security.



- Conduct business with respect to export control and sanction laws and regulations
- Adhere to reporting and recordkeeping, in compliance with the applicable laws and guidelines



- Evade any applicable laws and regulations relating to Trade and Export controls and sanctions, including licensing requirements
- Conduct business activities before undertaking due diligence and clearance procedures
- Get involved in projects with domestic or cross-border transactions which may expose Luminous to infringing export control regulations

Select and Manage Suppliers Responsibly

We value our relationships with suppliers, beyond the purchase and delivery of goods and services. We deal with them in a mutually supportive and open, fair, objective way.

To achieve our vision for sustainable procurement, we require our suppliers' full support and collaboration. We conduct our business together ethically, focusing on human rights and social impact at all levels and the preservation of ecosystems and resources with circular economies for an inclusive and carbon-neutral world.

We expect our suppliers to commit to and implement business practices with full respect to the environment, human rights, health, safety, decent work conditions, and fair business standards.



- Extend our values and commitments to the whole value chain and not only to our employees
- Require future and existing suppliers to comply with Luminous's Suppliers Code of Conduct
- Award suppliers fairly based on open, competitive bidding and without favoritism
- Support suppliers in understanding our terms and conditions and in meeting our expectations, in line with industry standards
- Expect our buyers, and other Luminous stakeholders in contact with our suppliers, to apply fair and ethical business practices



- Impose abusive conditions on suppliers, such as unattainable deadlines or unfair payment conditions, etc.
- Select or award suppliers who do not meet our values and expectations



TRUST WITH INVESTORS

Prevent Insider Trading

01

TRUST WITH INVESTORS



Insider trading occurs when a person trades in a company’s securities when in possession of material nonpublic or price-sensitive information about that company.

As employees, we must be mindful of our responsibility to respect insider dealing laws and regulations as we may have access to inside information about Luminous and its listed subsidiary companies.

Employees are not restricted from making personal investments, but it is prohibited to trade in any Luminous or listed parent/subsidiary companies’ shares while aware of nonpublic information that can significantly affect the market value of these shares.

Examples of insider trading include buying or selling shares before announcing financial results, acquisitions, divestments, winning or losing major contracts, or ongoing litigation, etc. which may cause the company’s share price to rise or fall.

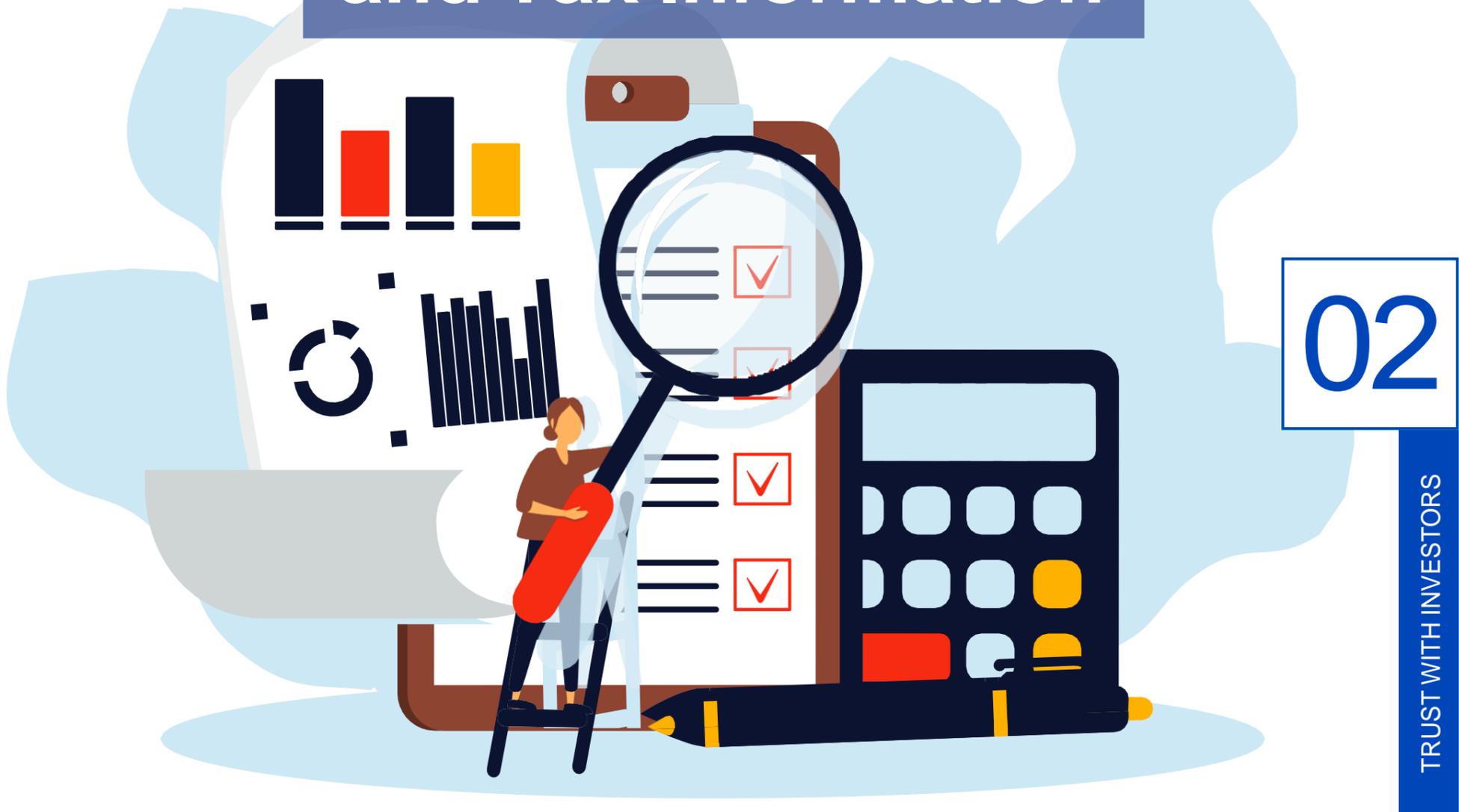


- Only disclose inside information, on a strictly need-to-know basis and with the authorization of the Board of Directors’ Secretary
- Avoid chain mails and conversations in public spaces
- Consult the Board of Directors’ Secretary, if in doubt, before buying or selling Luminous shares or its listed parent/subsidiary companies’ shares



- Buy or sell shares in Luminous or its listed parent/subsidiary companies if we have inside information at that time
- Disclose inside information to anyone, inside or outside the company, without the Board of Directors’ Secretary authorization

Deliver Accurate Financial Statements, Records and Tax Information



All our financial records must be accurate, properly maintained and transparent to accurately present Luminous's performance in accordance with Indian Accounting Standards (Ind AS) and to regularly provide transparent and trustworthy information to shareholders.



- Enforce internal controls and processes to ensure that our financial and business records, including financial and non-financial reporting, are always accurate
- Continuously review and improve our processes to attain the best standards in the market
- Follow all recordkeeping guidelines to maintain records securely
- Cooperate with our internal and external auditors



- Make any exceptions to our financial processes
- Sell, transfer or dispose any of Luminous's assets without proper authorization and documentation
- Accept cash transactions unless no alternative is possible and only then subject to the authorized legal amount, expressly authorized and properly recorded
- Conceal payments via third parties
- Knowingly evade tax obligations

Deliver Solutions in Compliance with Financial and Risk Management Standards



TRUST WITH INVESTORS

03

Our solutions are designed, manufactured, and delivered to meet customer specifications, ranging from simple engineered-to-order solutions to complex integrated solutions.

From the earliest stage of each project, we involve experts to identify and manage potential risks related to financial, legal and implementation matters. We comply with contractual terms and financial reporting standards to protect our assets.



- Consult legal expertise to check liability exposure before approving contracts
- Allocate people to each project with appropriate skills and competencies
- Implement a sequential business opportunities review and approval methodology, in compliance with our Charts of Authority
- Run comprehensive expert assessments so approvers make informed decisions by evaluating risks, benefits and propose mitigating actions
- Identify project performance obligations per the Recognize Revenue policy, in accordance with International Financial Reporting Standards (IFRS)
- Conduct regular project reviews to update forecasts, control risks, identify opportunities, and monitor customer satisfaction
- Secure cash and margins for projects in compliance with all applicable laws, regulations and standards through accurate and timely reporting



- Get involved in bids and contracts without expert analysis and approvals per our Chart of Approval
- Get involved in the integration of legal entities or other arrangements which intend to share profits and/or losses and liabilities without CFO approval
- Provide parent company guarantees without CFO approval
- Raise customer expectations that don't coincide with our Chart of Authority's approved mandate
- Knowingly misrepresent a projects' financial performance

Preserve our Information Technology and Related Intellectual Property Assets



04

TRUST WITH INVESTORS

Our IT (Information Technology) and IP (Intellectual Property) assets enable us to effectively achieve our business and sustainability goals and become a more digital organization.

It is our collective responsibility to source, implement, manage, and retire our IT and IP assets correctly. Moreover, it is essential to reduce any existing and new risks that may arise from how we use these assets.



- Understand how to properly handle company assets and apply security guidelines
- Give the same level of care to those company assets we use as we would to our own assets
- Apply sustainable thinking when working with or returning our company assets
- Apply our IT Asset Management Policy when creating software IP



- Use company assets for our own personal needs or in ways that interfere with our professional responsibilities
- Use assets belonging to third parties, such as photos or videos, etc., without ensuring that we have the right to use them
- Acquire, sell, transfer, or dispose of any IT or IP assets without following Luminous's process

Preserve our Reputation



We are all custodians of our brand and its reputation. As representatives of Luminous, we must choose our words wisely and act responsibly in both formal and informal meetings and discussions.

Information is valuable, and the unauthorized disclosure of internal information can be detrimental to the Luminous brand image. As well, we make our best effort to honor the commitments we take in financial and extra-financial matters and we communicate on a regular basis on the achievement of these commitments.



- Demonstrate ethical and professional behavior externally and protect Luminous's reputation, use official communication materials and follow brand guidelines
- Act with caution when posting on social media
- Avoid discussing confidential topics externally, in public places
- Respect confidential information by signing Non-Disclosure Agreements (NDA)
- Take the right care in elaborating our commitments for future financial and extra-financial performance, and make our best effort to deliver



- Interact with the press or speak publicly without prior approval
- Share any confidential or proprietary company information related to R&D, pre-launches, mergers, acquisitions, disposals, financial performance, intellectual property, internal documents or customer and employee information, etc.
- Comment on financial performance or announcements
- Get involved in activities that could reflect negatively on Luminous
- Involve Luminous in our personal convictions and beliefs
- Express our personal opinions about Luminous through official communication channels, such as social media
- Disparage Luminous or our colleagues on online forums



TRUST WITH COMMUNITIES

LUMINOUS

Act for a Climate Positive World



TRUST WITH COMMUNITIES

01

We take our climate pledge very seriously, and we help our customers drive their business growth while reducing their carbon emissions. We share our carbon-neutrality responsibility and ambitions with our employees, customers and other stakeholders.



- Increase our customers' energy efficiency, enable the growth of renewable energy and reduce CO₂ emissions
- Consider climate impact as part of our corporate and industrial strategy
- Advise customers on improving their energy management and reducing their carbon footprint
- Act with suppliers to reduce emissions throughout our supply chain, from production to transport to waste management
- Disclose detailed information on the environmental life cycle footprint of our products
- Reduce the CO₂ emissions in our sites and facilities with our technologies and by using renewable energy sources
- Encourage our employees, partners and customers to reduce their carbon footprint



- Consider the environment secondary to our business priorities
- Merely comply with laws and regulations; on the contrary we strive to set and achieve ever more ambitious goals

Be Efficient with Resources

02

TRUST WITH COMMUNITIES

In respect of our planet, its nature and biodiversity, we have pledged to continuously minimize our environmental impact and take care to use fewer resources and more green materials in our products. We have developed circular-use systems to incorporate reuse, repair and recycling, and welcome innovative service models which extend the life of our products.



- Innovate with circular offers enabling increased life cycle services and efficient maintenance
- Include recycled materials in our products without compromising on safety and quality
- Reduce waste intensity
- Comply with high environmental standards and regulations
- Disclose environmental information about our products
- Prevent and limit pollution and emissions
- Report environmental abuses for investigation and remediation
- Save water and implement responsible sewage management
- Endorse initiatives to protect nature and wildlife



- Practice the planned obsolescence of our products
- Seek exemption from substance regulations
- Intentionally disregard our indirect impact on biodiversity

Uphold Responsible Lobbying and Political Activity



TRUST WITH COMMUNITIES

03

We play a role in the public debate, clearly stating our position on issues, defending our interests and participating in technical discussions.

As such, we must act with integrity in all public decision-making processes and interactions with public officials when lobbying. We communicate publicly and transparently on our position shared through official meetings or position papers with public decision-makers.



- Take part in lobbying and representation activities only when authorized
- Report our lobbying activities where requested
- Strictly adhere to laws governing lobbying and interaction with public officials, and expect the same from third-parties who act on our behalf



- Participate in activities that could be considered as taking a partisan position on behalf of Luminous
- Make contributions (either monetary or in-kind) to political bodies directly or through third parties
- Get involved in political activity or representation on behalf of Luminous
- Interact with public officials or participate in activities that could be considered as taking a partisan position or which may compromise Luminous's reputation

Empower Local Communities

Our global presence allows us to help less-privileged communities through specific initiatives. Through charitable contributions and donations, by teaching, and volunteering our personal time, we support and stimulate communities, providing training to empower grassroots development and investment.



- Support communities with reliable, long-term commitments
- Maintain flexible work policies that encourage employees to devote work time to volunteering
- Provide opportunities to devote time to volunteering, community service and social causes



- Force any employees or third-parties to participate in, or donate to good causes
- Get involved in initiatives that are not in line with our ethical principles or community work

Do not use 'Conflict Minerals'



TRUST WITH COMMUNITIES

05

We do not use any products or raw materials which either directly or indirectly finance armed groups involved in the mining and trading of 'conflict materials' and associated human rights abuses. In line with this commitment, we ensure our products and the substances used in our products are compliant with applicable laws, throughout our supply chain.



- Source minerals and metals from trusted and socially and environmentally responsible suppliers
- Influence suppliers towards more responsible sourcing with a Conflict Minerals Compliance program
- Adhere to internationally recognized standards for Conflict Minerals



- Work with suppliers who source from or are related to organizations violating human rights

Act as Good

Corporate Citizens

a) Protect the Vulnerable from Abusive Working Conditions



TRUST WITH COMMUNITIES

06a

We believe in dignity, respect, fairness and protecting the most vulnerable from abusive working conditions, including child, forced or other improper labor. We monitor and evaluate our supply chain to ensure that everyone involved has safe working conditions, decent working hours and can earn a minimum living wage. We expect our suppliers, subsidiaries and customers to act similarly.



- Operate a value chain free from labor abuses of any kind
- Treat our suppliers and subsidiaries' workers as we treat our own employees
- Conduct due diligence with suppliers, contractors and other stakeholders
- Continuously improve our entire supply chain through dialogue, information sharing and training
- Work with NGOs, business associations and other companies to collectively improve working conditions



- Tolerate human rights infringements
- Delay in responding to any potential labor abuse or violations

b) Respect the rights of Association, Representation and Social Dialogue



TRUST WITH COMMUNITIES

06b

We uphold our employees' right to set up associations and recognize their right to collective bargaining. In accordance with local regulations, our employees are free to join, take part in or leave labor organizations that maintain and defend their interests. We follow all the requirements to build and sustain fruitful and mutually beneficial relationships between labor organizations and management.



- Respect the right of workers to set up and join representation groups and unions
- Foster and encourage constructive dialogue
- Provide workers with the means to run these activities



- Implement internal measures which limit employee access to labor organizations
- Interfere with the work of employee representative groups and unions
- Discriminate or intimidate employee representative bodies or their members

LUMINOUS

Khushiyon ka ghar

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