

Code of Conduct and Ethics

At LUMINO, we believe in human rights.

Human rights can generally be divided into the following categories:

- Fundamental human rights in the workplace
- Working conditions
- Civil and political rights
- Economic, social and cultural rights
- Rights for vulnerable groups

LUMINO takes responsibility for supporting and respecting all human rights and will ensure that it does not contribute to violations of these rights on any of the following levels:

- Impact caused by LUMINO
- Impact that LUMINO contributes to via its relationship with a subcontractor
- Impact caused by a subcontractor which LUMINO does not contribute to itself, but is still linked to the negative impact via its relationship with the supplier.

To ensure LUMINO does not cause or contribute to and is not linked to negative impact on human rights, it will continually work to:

- Asses the risks of negative impact
- Manage identified risks, with the highest priority given to the most severe risks
- Monitor the effects of these efforts and communicate regarding their progress
- Engage in dialogue with the groups and individuals that could potentially be impacted



HUMAN RIGHTS IN THE WORKPLACE

Child labour, as defined in ILO conventions 138 and 182, is prohibited. Procedures shall be in place for action to take if child labour is discovered in order to resolve the issue without harming the social situation of the child or family (UN Convention on the Rights of the Child 32).

The hiring of young workers is permitted, provided that their school education is not affected and that they do not work overtime or perform dangerous tasks.

All forms of forced or compulsory labour are unacceptable. LUMINO does not tolerate the use of prisoners or illegal workers to produce goods or perform services.

All workers shall be treated with respect and dignity. Physical punishment or harassment of a physical, psychological, sexual or verbal nature is not permitted.

Discrimination on the basis of ethnic origin, gender, age, pregnancy, religion, social origin, disability, political opinions or sexual orientation is prohibited.

Workers shall have the right to organise in a union without negative consequences. In countries where the right of association is limited or in development, LUMINO will help to facilitate meetings between workers and management to discuss pay and working conditions without negative consequences (ILO 87 and 98).

WORKING CONDITIONS

All workers shall have received a legally binding employment agreement in writing in a language the employee understands which lays out the terms and conditions of employment. The employer shall have procedures in place to ensure that all workers are informed of their statutory rights and obligations.

Wages shall be paid directly to the employee at the agreed time and in full. Wages shall be no less than the statutory minimum wage. Everyone who works has the right to just and favourable remuneration, ensuring for themselves and their family an existence worthy of human dignity (ILO 131, Art 23 UDHR).

The weekly working hours are not permitted to exceed the statutory maximum. All overtime shall be voluntary and shall be compensated in accordance with national legislation. The worker shall not be required to pay deposits. (ILO 1 and 14, Art 23.3 UDHR).

The working environment shall be safe and promote good health for the worker. Systematic efforts shall be undertaken at the workplace to actively prevent work-related injuries. LUMINO will ensure that goods are produced in buildings that are safe to be in.

Workers shall have access to clean sanitary facilities and clean drinking water (ILO 155, 164).

LUMINO will have procedures in place for fire protection and safety in accordance with national legislation and/ or international guidelines.

In the event that LUMINO provides its employees with housing, the fire protection, safety and hygiene requirements above shall extend to such housing.



ENVIRONMENT

The environmental aspects considered in this Code of Conduct are those which impact the human environment where production of the goods and raw material extraction take place.

LUMINO continues to provide environmental and health assessments of goods in line with applicable statutory national legislation.

LUMINO will work systematically to reduce the impact of the product on the environment and human health. This systematic work can include, but is not limited to: identifying significant environmental impact, measuring, recording and working actively to reduce the supplier's consumption of energy and resources, waste, and emissions to the ground, atmosphere and water.

LUMINO will have procedures in place to check that raw materials are extracted in a responsible manner for the most significant parts of the product.

Chemicals used in production and raw material extraction shall be handled in such a way that risks to humans and the environment are minimized.

If there is a threat of severe or irreparable damage to the environment or human health, action to prevent the damage should not be postponed. This also applies in cases where complete scientific evidence is lacking (Precautionary Principle, Rio Declaration).

CORRUPTION AND BRIBERY

The supplier is not permitted to give or take bribes or use any other method to unjustly influence officials, the judiciary or private entities.

In dealings with subcontractors, consultants and other intermediaries, the supplier shall have procedures in place to ensure that there is no corruption (United Nations Convention against Corruption).

Andrew Small

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