

CODE OF CONDUCT

Molto Luce GmbH

CODE OF CONDUCT

2023 | 10

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1. BASIC UNDERSTANDING

assume responsibility within the context of our respective possibilities and scope of action by taking into account the consequences of our business decisions and actions in legal, economic, technological as well as social and ecological terms. In this way, we contribute to the social and economic development of the countries and regions in which we operate.

Our actions comply with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and honesty as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labour standards of the International Labour Organization (ILO) as well as the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct defines the basic principles of our actions, which we actively require our employees worldwide to observe. The content applies to all branches and business units of our company.

We expect the same basic understanding from our business partners. Rights in favour of third parties should not be established.

2. COMPLIANCE WITH THE LAW

Compliance with the applicable laws and other legal regulations of the countries in which we operate is a matter of course for us. If local laws and regulations are less restrictive, our actions are based on the principles of this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law takes precedence. However, we endeavour to comply with the contents of this Code of Conduct.

3. INTEGRITY AND COMPLIANCE

We have taken appropriate compliance measures to ensure that the following topics are adequately covered:

3.1 CORRUPTION

We do not tolerate corruption, bribery or extortion; they prevent fair competitive conditions. In our business relationships, we do not promise, offer, grant, demand or accept inducements with the intention or appearance of influencing business decisions or gaining any other unauthorised advantage, nor do we allow ourselves to be promised such inducements. A particularly strict standard must be applied when dealing with persons to whom special criminal and liability regulations apply (e.g. public officials).

Only minor gifts and/or invitations that are customary in the country and typical of the country may be accepted or offered in accordance with general, socially recognised and customary business practices if they serve to maintain business relationships and as long as they are not intended to influence a business action or omission. If, as a result, business decisions are influenced or the mere appearance is created that business decisions can be influenced, such gifts and/or invitations are also prohibited.

Offering, requesting or accepting gifts of money or cash is not permitted in any case.

If there are any doubts, the direct superior must be informed and, if necessary, their authorisation obtained.

3.2 FAIR COMPETITION

We act in accordance with national and international competition and antitrust law and do not participate in price fixing, market sharing or customer, market or supply agreements.

3.3 PREVENTION OF MONEY LAUNDERING

Money laundering refers to the process of smuggling illegally obtained money or illegally acquired assets into the legal financial and economic cycle. We fulfil our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

3.4 PROTECTION OF INFORMATION AND INTELLECTUAL PROPERTY

We protect confidential information and respect intellectual property; technology and know-how transfers must be carried out in such a way that intellectual property rights and customer information, business secrets and non-public information are protected. We observe the applicable laws for the protection of business secrets and treat confidential information of our business partners accordingly.

3.5 DATA PROTECTION

We process, store and protect personal data. Personal data is collected confidentially, only for lawful, predetermined purposes and in a transparent manner. We only process personal data if it is protected against loss, alteration and unauthorised use or disclosure using appropriate technical and organisational measures.

3.6 EXPORT CONTROL

We undertake to comply with the relevant legal standards for export control - in particular authorisation requirements, export and assistance bans - when transferring and exporting our goods.

3.7 AVOIDANCE OF CONFLICTS OF INTEREST

We avoid internal and external conflicts of interest that could illegitimately influence business relationships. If this is not successful, we disclose these conflicts.

4. HEALTH AND SAFETY

We will protect the health of our employees by taking appropriate health and safety measures, e.g. implementing an occupational health and safety management system, that adequately address the following issues:

- Compliance with applicable laws and adherence to international health and safety standards.
- Appropriate workplace design, safety rules and provision of appropriate personal protective equipment.
- Implementation of preventive controls, emergency procedures, an accident reporting system and other appropriate continuous improvement measures.
- Providing employees with access to potable water in sufficient quantities and access to clean sanitary facilities.

We ensure that all our employees are instructed accordingly.

5. COMPENSATION AND WORKING HOURS

Compensation is based on applicable laws and binding collective bargaining agreements, supplemented by applicable national minimum wage laws. Employees are provided with clear, detailed and regular information on the composition of their compensation.

We comply with applicable laws and (international) labour standards regarding maximum working hours and ensure that:

- Working hours, including overtime, do not exceed the maximum limits permitted by law.
- Working hours, including overtime, may not exceed 60 hours per week, even in exceptional cases, unless there are no provisions to the contrary.
- Employees are permitted to take legally required rest periods.

6. RESPECT FOR HUMAN RIGHTS

We respect and support the observance of internationally recognized human rights and will

- respect the personal dignity, privacy and personal rights of each individual,
- protect and grant the right to freedom of opinion and expression and
- do not allow any unacceptable treatment of employees, such as physical and psychological abuse, sexual and personal harassment or discrimination.

6.1 BAN ON CHILD LABOUR

We do not tolerate the use of child labour. We do not hire employees who are not at least 15 years of age and require proof of age. The minimum age may be reduced to 14 years in countries that fall under the exception for developing countries under ILO Convention No. 138. We do not hire employees for dangerous

work who are not at least 18 years of age in accordance with ILO Convention No. 182.

6.2 BAN ON FORCED LABOUR

Forced labour, modern slavery, or other forms of involuntary slavery are prohibited. All work must be voluntary and the employment relationship must be terminable.

6.3 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the rights of employees to freedom of association, assembly and collective bargaining to the extent permitted by law and possible in the country in which we operate. Where this is not permitted, we will search for appropriate compromises for our employees.

6.4 PROMOTING DIVERSITY AND EQUAL OPPORTUNITY

We promote equal opportunity and do not tolerate discrimination. We treat all people equally, regardless of gender, age, colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideologies, or other personal characteristics.

7. ENVIRONMENT, ENERGY AND CLIMATE CHANGE

We act in accordance with applicable laws and international standards to minimize negative impacts on the environment and continuously improve our environmental and climate protection activities. All employees are made aware of environmental protection and are provided with the necessary training and courses.

We have taken appropriate environmental measures and documented them in a sustainability program that adequately covers the following topics:

- Objectives, definition and implementation of actions and their continuous improvement
- Environmental aspects such as reducing CO2 emissions, increasing energy efficiency and using renewable energy, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and disposing of it properly, and handling hazardous substances responsibly for people and the environment.

8. DEALING WITH CONFLICT MINERALS

We take the necessary care to avoid the use of conflict minerals in our products to prevent human rights abuses, corruption, and the funding of armed groups.

9. SUPPLY CHAIN

We expect our suppliers to adhere to the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct throughout their supply chains. We reserve the right to review the application of this Code of Conduct by our suppliers on a systematic and ad hoc basis. This may take the form of questionnaires, assessments or audits.

If there is any doubt about compliance with this Code of Conduct, the supplier will be asked to take appropriate action and report the matter to the appropriate contact in our company. If necessary, the relationship will be terminated.

10. CONSUMER INTERESTS

Where consumer interests are involved, we will comply with consumer protection legislation and appropriate sales, marketing and information practices. Particularly vulnerable groups (e.g. young people or pregnant women) are given special consideration.

11. IMPLEMENTATION AND ENFORCEMENT

We will make relevant and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees will be informed of the content of the Code of Conduct and will receive training on relevant topics as required. Violations of the Code of Conduct will not be tolerated and may result in employment consequences.

11.1 COMMUNICATION

We communicate openly and in a dialogue-oriented way with employees, customers, suppliers and other interest and stakeholder groups about the requirements of this Code of Conduct and its realization.

11.2 INFORMATION AND VIOLATIONS

We provide our employees and business partners with access to a protected mechanism for the confidential reporting of possible violations of the principles of this Code of Conduct. If you have a concern, please contact the following person/office directly or anonymously.

WOLFGANG BRUNMAYR

Name of the contact / position

brunmayr@moltoluce.com

Contact details (e-mail address, phone number)

12. SIGNATURE

FRIEDRICH EIBER
Name of the authorized signatory

Signature of the authorized signatory

WELS, 11.01.24
Place, date



MOLTO LUCE GmbH FN 165421v
Company name, address, company stamp