

# SUPPLIER CODE OF CONDUCT

## 1. GENERAL

### 1.1. CONTEXT

Luminus wants to build a **carbon-neutral energy future**, where planetary protection, human well-being and economic growth are reconciled thanks to electricity and innovative solutions and services. As a company, we are convinced that we can only achieve this goal with the **cooperation of our suppliers**. With this Code of Conduct we want to establish the **basic principles** for establishing and evaluating **sustainable cooperation** in all its forms.

### 1.2. CODE OF CONDUCT COMPLIANCE

Luminus expects its suppliers to **comply with this code of conduct** and to continuously improve their sustainability performance. The supplier does this by providing its own personnel with the required training and competencies, as well as extending the same sustainability requirements to the own supply chain.

Implementing mechanisms to identify and manage sustainability risks as well as developing corresponding documentation to demonstrate compliance with this Code of Conduct are a logical consequence of this.

## 2. ETHICS AND GOOD GOVERNANCE

*To be socially responsible, we expect suppliers to conduct business in an ethical manner and to act with integrity according to basic principles of good governance.*

*Ethical requirements include but are not limited to the following:*

### 1.3. RESPECT FOR LEGISLATION

Suppliers will comply with all applicable national and international laws, as well as generally recognized standards and regulations.

Particular attention is paid to protecting confidential information, personal data & privacy and intellectual property rights, as well as preventing violations of competition law, anti-trust laws, anti-money laundering laws and anti-terrorism laws.

### 1.4. BUSINESS INTEGRITY

Suppliers shall not employ or tolerate any form of fraud, corruption, extortion or embezzlement. They shall also not offer or accept bribes or other illegal gratuities to or from their business partners.

Suppliers may not offer Luminus employees gifts or other personal benefits arising from relationships with suppliers.

### 1.5. CONFLICTS OF INTEREST

When employees or associates of the supplier, who are in any way connected to Luminus as a procurer or as a customer, may directly or indirectly influence (whether or not resulting in personal interests) an objective course of the procurement procedure or the execution of the contractual commitment, the supplier will take the necessary actions to withdraw these persons and replace them with neutral persons.

### 3. SAFETY AND HEALTH

*Suppliers provide their employees with a physically and psychosocially safe and healthy workplace. In addition, they shall take the necessary steps to ensure everyone's safety when their employees or associates enter Luminus' premises or infrastructure. This includes, but is not limited to:*

#### 1.6. REGULATIONS AND CERTIFICATION

Suppliers will comply with all applicable quality, safety and health regulations and requirements and fulfill their operational and reporting obligations. A supplier that can provide safety certification (such as SCC, SCC, ISO 45001, or equivalent) will be valorized by Luminus.

#### 1.7. PREVENTIVE ACTIONS

Suppliers will protect their employees from hazards and risks associated with the work equipment, products and materials their employees use. Suppliers will provide controls, work procedures, preventive maintenance and the necessary technical protective measures and training to reduce health and safety risks in the workplace. Where necessary, suppliers will provide workers with appropriate collective or personal protective equipment.

A safe and healthy work environment/accommodation includes, at a minimum, potable water, appropriate lighting, heating or cooling, ventilation and sanitation.

#### 1.8. EMERGENCIES, RISKS AND TRAINING

Suppliers will make available safety information about identified workplace hazards and train workers to adequately protect themselves from those hazards.

Suppliers will identify, assess potential workplace emergencies and minimize their impact by implementing emergency plans.

### 4. ENVIRONMENT, BIODIVERSITY AND ENERGY

*Luminus expects suppliers to show commitment, act proactively and continuously improve the way they work with regard to energy use, environmental protection and promotion of biodiversity.*

#### 1.9. REGULATIONS AND CERTIFICATION

Suppliers will comply with all applicable environmental and energy regulations and requirements as well as their operational and reporting obligations.

A supplier that can present environmental and/or energy management certification (such as ISO 14001, ISO 50001 or equivalent) will be valorized by Luminus.

#### 1.10. CONSERVING AND RECYCLING

The supplier shall take action to reduce or limit the consumption of water, gas and electricity (and others) and/or implement recovery measures where appropriate. The supplier shall favor reusable packaging wherever possible and will limit the use of artificial noise and light sources.

#### 1.11. REDUCING IMPACT

The supplier will reduce emissions of greenhouse gases and encourage waste sorting, treatment and recycling. Where possible, the principle of circularity will be applied.

The supplier will avoid harmful impact and local contamination of a product on the environment and avoid the use of resources whose extraction is harmful to the environment, climate or biodiversity.

### 1.12. COMPENSATING MEASURES

If the above primary actions are not feasible, the supplier takes the commitment to consider (with or without a third party) and arrive at compensatory measures that preserve and/or promote the environment and biodiversity. Examples include: action to improve water quality, protect ecosystems, plant new forests.

## 5. HUMAN RIGHTS

*Suppliers take action to protect every individual and therefore recognize the Universal Declaration of Human Rights, and act accordingly. They protect the human rights of their employees and treat them with dignity and respect.*

*This includes the following aspects:*

### 1.13. LABOR AND WORKING CONDITIONS

Suppliers will not tolerate child labor in the supply chain. They must avoid any form of child labor in their business practices in accordance with the principles of the United Nations Global Compact.

In addition, they will not accept any form of slavery, forced or compulsory labor and human trafficking.

Suppliers respect the principle of “freely chosen work.”

Suppliers respect legal working hours and provide their employees with fair and competitive compensation and benefits associated with them.

### 1.14. DIGNITY, DIVERSITY AND INCLUSION

Equal treatment of all employees is a fundamental principle of the supplier's company policy.

There shall be no discrimination on the basis of race, national origin, sex, age, appearance, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, or any unlawful criterion under applicable law.

Racism will not be tolerated by the supplier.

Suppliers will provide their employees with a work environment free from inhumane treatment, free from sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of such treatment. In addition, suppliers are expected not to terminate an employment contract unfairly or without clear evidence that termination of an employment contract, related to an employee's work performance, is permitted by law.

### 1.15. FREEDOM OF ASSOCIATION

Suppliers will seek open and constructive dialogue with their employees and employee representatives.

In accordance with local laws, suppliers will respect the rights of their employees to freely associate, join unions and works councils and be represented.

## 6. VARIA AND OTHER PROVISIONS

### 1.16. LOCAL ECONOMY

Whenever possible, suppliers give preference to local production and employment in their own region. By doing so, they contribute to the economic growth and sustainable growth of the communities in which they operate. This practice not only promotes local employment and economic stability, but also helps reduce environmental and community impacts through shorter supply chains.

### 1.17. AUDIT PRINCIPLE

Upon request, Luminus can review the necessary documentation demonstrating that the supplier is taking the necessary actions to comply with this code of conduct. With mutual agreement on the content, the supplier grants its cooperation to Luminus to audit specific elements mentioned in this code of conduct.

### 1.18. WHISTLEBLOWER POLICY

For actions or behaviors that violate this Code of Conduct that may or may not impact Luminus, the supplier agrees to report them to [ethics@luminus.be](mailto:ethics@luminus.be).

### 1.19. REFERENCE SCORING (ECOVADIS E.A.)

In order to scale its maturity in terms of corporate social responsibility and to obtain an objective picture of this, the supplier is willing to undergo an assessment by a third party either spontaneously or at the specific request and under the guidance of Luminus.

Labels and certificates associated with this are valued by Luminus.