



CODE OF CONDUCT



YEAR 2024

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Prepared by: Management and CSR Committee 04/09/2024	Registered by:  Xavi Marbà Quality and IMS Manager 24/09/2024	Approved by:  Ignasi Cusidó CEO – General Manager 24/09/2024
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1. PURPOSE

This Code of Conduct sets out the guiding principles and standards for our operations and decisions, ensuring that we act responsibly in all Environmental, Social and Ethical Governance (ESG) areas. This code applies to all of Lamp's staff.

The Code of Conduct has been developed according to our three strategic pillars: Worktitude for Wellbeing, Worktitude for Innovation, and Worktitude for Life, and taking into account the things that define us as a company, our core values: Light is part of our DNA, our International Vision and our Local Commitment, our Human Team, and our Co-creation area, and these principles guide all of our actions.

The Lamp Group is part of Experience Brands, one of Europe's largest manufacturers of technical and architectural lighting, for indoor and outdoor luminaires. This Code applies to LAMP, S.A.U., and to the Group of companies headed by this company, including all companies that it directly or indirectly controls and excluding the companies that form part of Experience Brands.

This Code of Conduct serves as a guide to ensure appropriate behaviour by employees in the course of performing their professional duties, in accordance with the laws of each country in which the Lamp Group operates and the regulatory framework in place, while respecting the values of their respective cultures.

The Lamp Group shall ensure that the principles set out in this Code are observed in all the companies in which it has a stake.

2. SCOPE

This Code applies to all of the Lamp Group's companies and businesses, and those in which it has managerial responsibilities, irrespective of the country in which they operate.

For the purposes of this Code, the Lamp Group comprises LAMP, S.A.U., LAMP FRANCE, LAMP COLOMBIA, LAMP MEXICO, DILAMP, S.A., LAMP MEXICO, LAMP FRANCE, LAMP COLOMBIA, LAMP MEXICO and DILAMP, S.A.

3. PURPOSE, MISSION AND VALUES OF THE LAMP GROUP

PURPOSE. We craft lighting solutions that cater to modern lifestyles, enhancing wellbeing through quality lighting and fostering a positive impact on both people and the environment.

At Lamp, we embody a strong *work ethic* and *attitude*; we are *Worktitude for Light*

To realise our vision, we are guided by our three strategic pillars or *Working Paths*:



Worktitude for Wellbeing

We see lighting as an essential element to improve people's wellbeing, analysing both the visual and non-visual effects of light.



Worktitude for Innovation

We promote and take on innovation projects focused on constant transversal improvement, with the understanding that innovation is a systemic and systematic process.



Worktitude for Life

We promote projects that have a positive impact on the environment and work to achieve a more sustainable lighting industry.

MISSION. The Lamp Group offers efficient lighting solutions, tailored to the needs of each project thanks to its team, who, with their many years of experience and commitment to design and engineering, bring their particular vision and understanding of light wherever they are.

We advise on, design, produce, market and implement technical lighting projects. This is Lamp's hallmark, a commitment we've maintained for over 50 years: solving our customers' lighting challenges with a reliable and tailored approach to architectural projects worldwide.

VALUES


- What defines us:

Light is in our DNA For 50 years we have been **solving our customers' lighting challenges**. We combine experience, knowledge and continuous development at every stage, from our manufacturing process to our advisory services.

International vision In our factory and HQ in Terrassa and with a local presence through our 5 subsidiaries, we operate in **over 70 countries**.

Team Engineers, designers, technicians and **professionals in a host of roles work together on your next project**.

Co-Creation Forming a single team with our customers to develop special lighting solutions, making **each project unique**.

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4. GUIDELINES FOR RESPONSIBLE BEHAVIOUR AND PRACTICES

This Code of Conduct establishes specific guidelines for actions in the following areas:

4.1 Environmental responsibility

The Lamp Group shall comply with all regulations concerning environmental protection and it is strongly committed to sustainability. Therefore, we must adopt and follow the practices set out in the Guidelines for Good Environmental Practices, and the internal policies and procedures currently in place.

Lamp's commitment to sustainability is demonstrated by its:

- Adherence to the United Nations Global Compact, a public commitment to align with the ten universally accepted principles in the areas of human rights, labour standards, environment and anti-corruption.
- Support for the objectives of the United Nations as set out in the Sustainable Development Goals (SDGs).
- Commitment to preparing and publishing the Progress Report.

The United Nations Global Compact offers information, training and other tools to help companies tackle the sustainability challenges they face. The main idea is to equip teams of professionals with the knowledge and skills they need to achieve the SDGs and make the best possible contribution to the United Nation's 2030 Agenda.

As the organisation itself states, the first step in any corporate sustainability plan is to have the right attitude and values. At the very least, companies must fulfil a number of fundamental responsibilities in relation to the environment, but also with regard to human rights, labour and anti-corruption.

To fulfil these basic responsibilities, the Ten Principles of the UN Global Compact have been proposed, which companies can adopt as part of their sustainability strategies and plans.

By fulfilling their commitments, companies adhering to the Compact not only accept their responsibility to the community and the planet, but also lay the foundations for a successful business model that is fairer and more beneficial to all.

In addition to setting out these core principles for sustainable business development and providing up-to-date information on the SDGs and how to achieve them, the Global Compact also provides a platform to promote good practices.

Lamp supports projects that have a positive impact on the environment and promotes a more sustainable lighting industry.

We believe that bringing a space to life requires the shared effort of many companies and professionals working responsibly **to reduce environmental impacts throughout the value chain**. We contribute by providing **realistic, efficient, sustainable solutions aligned with today's climate reality**.

In view of the challenges facing the building industry in general, and the lighting industry in particular, these are the key areas of action that we address in our SUSTAINABILITY PLAN.

LE01 TARGET ID 1.1/1.2/1.3/15.1/15.2/15.3/3.4/3.5

Decarbonisation of lighting solutions - (including embodied and operational CO2 emissions).



LE02 TARGET ID 2.1/2.2/3.3/15.3

Reducing the use of non-renewable resources.

Reducing non-segregated waste.

Increasing sales of products made from recycled materials.




LE03 TARGET ID 3.1/3.2/16.1

Promoting circularity and resilience in lighting solutions, by introducing a “cradle-to-grave” approach (assessing phases A1 to D) and implementing strategies to minimise waste at the end of a product's life cycle. Cutting CO2 emissions by implementing cumulative circular lighting projects.

We are aware of our impact on the planet, and on the wellbeing of the people in our community, recognising the need to **undertake the necessary changes through innovation, creativity and collaborative work**.

The Sustainability Plan shall be reviewed annually in order to continuously improve our performance.



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4.2. Social responsibility

4.2.1 Commitment to human and labour rights

At Lamp we respect and promote human rights in all our operations and supply chains, ensuring fair working conditions, job security, and forbidding any form of child, forced or discriminatory labour.

Lamp expresses its commitment and dedication to the human rights recognised in domestic and international legislation in accordance with the principles upon which the United Nations Global Compact is based, the Sustainable Development Goals (SDGs) approved by the United Nations, and any other documents and texts that may replace or supplement the above and are applicable to them.

In particular, Lamp declares its total rejection of child labour and forced or compulsory labour and any form of modern slavery and undertakes to respect freedom of association and collective bargaining and non-discrimination based on any grounds or circumstances, the rights of ethnic minorities and indigenous peoples wherever they operate, and to promote open dialogue that embraces different cultural frameworks.

Lamp promotes equal treatment between men and women with regard to access to jobs, training, professional promotions and working conditions.

In 2022 Lamp demonstrated its public commitment to equality between men and women by registering its Equality Plan in the Register and repository of collective bargaining agreements, collective work agreements and equality plans of the Generalitat de Catalunya, as well as publishing it on the company's website.

Through this Plan, Lamp undertakes to establish equal conditions for women and men in the daily running and management of the company, by setting equality targets and adopting strategies and practices.

This Plan was drawn up by the Human Resources Department with the assistance of the Equality Committee. And by approving it, Lamp's management undertook to fulfil its objectives, to publicise it through the established channels and to train the company's employees whenever necessary.

The Equality Plan has three objectives:

- To eliminate imbalances in the access and participation of women and men in the organisation.
- To ensure that human resource management processes (selection, professional classification, promotion and training, remuneration) abide by the principle of equal treatment and opportunities.
- In terms of equality between women and men, to promote a good work-life balance.
- To prevent sexual and gender-based harassment.

4.2.2 Child labour

Lamp does not tolerate child labour. Therefore, its suppliers of goods and services must guarantee that they will not directly or indirectly employ people who are under the minimum legal age to work in Spain, and that they implement the necessary measures to prevent child labour by forbidding children under the age of sixteen from being allowed to work.

4.2.3 Forced labour

Lamp, its suppliers of goods and services, and business partners shall not use forced labour. All work should be voluntary, and teams should be free to leave their workplace after completing their workday, or to terminate their employment contract at any time upon notice to the employer. We condemn any form of direct or indirect coercion. Hired labour must not be abused, and any practice that facilitates or aids forced labour is forbidden.

4.2.4 Commitment to diversity and inclusion

Lamp promotes non-discrimination based on race, colour, nationality, social origin, age, sex, marital status, sexual orientation, ideology, ethnicity, political opinions, religion or any other personal, physical or social condition of its employees and also promotes equal opportunities between them.

The use of discriminatory language in any type of internal or external corporate communication is forbidden, and the use of inclusive language is encouraged.

In order to abide by the principle of broadening the use of inclusive and non-sexist language in the workplace by employees, Lamp has developed the **Lamp Inclusive Language Guide**, as set out in our Equality Plan. This involves moving towards effective, real equality between men and women in the belief that the use of language shapes our thinking and must adapt to reflect our reality, beyond the regulatory framework and linguistic guidelines set by the bodies that oversee the quality of our language.

In short, the goals of this guide are to promote equality, prevent stereotypes and prejudices by using inclusive language, consider accessibility, recognise cultural diversity and encourage empathy and respect. By following these guidelines, we aim to create more inclusive messages and have a positive impact on society.

The Lamp Group rejects any form of physical or psychological harassment, bullying or abuse of authority, as well as any other conduct that may create an intimidating or offensive environment that violates the rights of individuals.

Employees shall treat each other with respect, encouraging cordial relations and a pleasant, healthy and safe workplace.

Whenever a new person joins the Lamp Group, he/she shall be welcomed by his/her colleagues in the most appropriate manner and provided with the necessary knowledge to adapt and integrate. Learning and experiences should be shared to make it easier to perform work well.

The process of integrating new staff involves the whole team working together to allow new employees to adapt easily to the way the company operates and to shorten the time it takes them to learn their new duties.

All Lamp staff are obliged to treat their colleagues, superiors and subordinates fairly and respectfully. Similarly, relations between the Group's employees and those of external partner companies or entities shall be based on professional respect and mutual collaboration.

4.2.5 Work-life balance

The Lamp Group considers the all-round development of individuals to be important, so it shall facilitate achieving a proper work-life balance.

Lamp respects the personal and family lives of its staff, promoting work-life balance policies that help to strike the best balance between these and their professional responsibilities. These are described and detailed in Lamp's **Work-Life Balance Plan**.

4.2.6 Relationship with the community

We are committed to making a positive contribution to local communities by investing in projects that promote economic, social and educational development. We support community initiatives and maintain an open and transparent dialogue with all stakeholders.

Lamp has various collaboration agreements with local non-profit social organisations that are leaders in ensuring the inclusion of people who are functionally diverse, in caring for the elderly, in cultural activities that are financially sustainable and socially responsible and with local special education centres.

To show its support for these entities, Lamp opens its doors and offers tours of its facilities with representatives of these institutions, it establishes collaboration agreements for internships with people who are at risk of social exclusion, with a view to fulfilling its voluntary commitment to operate in a responsible and ethical manner.

4.2. Occupational health and safety

The companies in the Lamp Group shall promote an occupational health and safety programme and implement the relevant preventive measures stipulated in the current legislation and any other laws that may be introduced in the future.

At Lamp we shall ensure a safe and healthy workplace by implementing occupational health and safety policies and promoting the physical and mental wellbeing of our employees.

The members of staff in the Group's companies shall pay close attention to occupational health and safety regulations, with the aim of preventing and minimising occupational hazards, accidents and injuries that occur during or in connection with work activities by limiting, as far as is reasonably practicable, the inherent hazards in the workplace.

At Lamp we are considering other measures to create a positive work environment and ensure our employees develop personally and professionally:


- Flexible work arrangements and the implementation of measures to promote a good work-life balance.
- Introduction of an annual training plan for the company's staff.
- Detailed employee health and safety risk assessments and a specific health and safety risk plan, in addition to good work practices.
- Regular assessments of employee wellbeing through a work climate survey.

4.2.8 Freedom of association and the right to collective bargaining

Lamp respects the right to freedom of association and the right to organise and collective bargaining, without the threat of disciplinary action or reprimands.

4.2.9 Discrimination

The Lamp Group respects the personal dignity, privacy and rights of each employee and it is committed to providing a workplace that is free of discrimination and harassment. Accordingly, employees shall not

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discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, nor shall they engage in any form of verbal or physical harassment based on the above or for any other reason.

4.2.10 Use and protection of assets

The Lamp Group provides its employees with the necessary resources to carry out their professional activities and undertakes to provide the means to protect and safeguard them.

All employees must use the company's resources responsibly, efficiently and appropriately in accordance with their professional duties. They must also protect and preserve them against any improper use that could harm the interests of the company.

The company does not allow the computers provided to its employees to be used to run software or applications that are NOT legal to use, which may damage its image or reputation, or to access, download or distribute illegal or offensive content.

4.3 Governance commitment

4.3.1 Transparency and ethics

We shall act with integrity in all our business dealings, maintaining transparency in our financial operations and reporting. We fight against corruption, bribery and all kinds of fraudulent practices.

The Lamp Group rejects any form of corruption, bribery or extortion and is opposed to influencing the decisions of people outside the organisation to obtain any benefit through the use of unethical practices, and the use of such practices with its employees. It shall also not accept other individuals or entities using such practices with its employees.

Any activity carried out by Lamp shall be guided by the principle of legality, pursuant to which all actions must be carried out in accordance with the applicable regulations. For this purpose:

- All of Lamp's staff must comply with current legislation regardless of where they perform their work and provide their services, paying close attention to the regulations on the prevention of money laundering, bribery and corruption.
- Likewise, the commitments and obligations undertaken in dealings with third parties shall be honoured, both at home and abroad.
- The company's management should be aware of the legislation applicable to their areas of responsibility, and ensure that employees comply with such legislation, and that they receive adequate information and training to enable them to understand and fulfil these obligations.

Lamp's staff shall not accept cash or cash-equivalent gifts for any amount (e.g. shares or any form of negotiable securities) or generally accept gifts whose value or nature are in excess of courtesy gifts, which are intended to improperly influence their business, professional or administrative dealings, whether with public or private entities.

In any event, courtesy gifts shall never take the form of cash payments and must always be authorised by the appropriate senior manager.

Additionally, while performing their professional duties, employees shall ensure compliance with the established internal controls in order to prevent irregularities and undue advantages in the company's dealings with third parties.

4.3.2 Corporate governance

We maintain a strong corporate governance structure, with a legal representative, appointed by the Board of Directors of Nordeon Group Spain SL, who is independent and accountable, overseeing and guiding the company's strategy and operations in accordance with the best interests of our shareholders and stakeholders.

4.3.3 Responsibility and accountability

We promote a culture of responsibility and accountability at all levels of the organisation. All employees and officers are required to adhere to this Code of Conduct and to report any non-compliance or unethical behaviour.

4.3.4 Corporate image and reputation

The Lamp Group believes that one of the cornerstones of its corporate image and reputation is building responsible relationships within the communities in which it conducts its business. A strong corporate image and reputation is one of the most valuable assets for maintaining the trust of its shareholders, customers, employees, suppliers, authorities and society in general.

With regard to our corporate image and reputation, Lamp Group employees shall:

- Take the utmost care to preserve the company's image and reputation in all their professional activities.
- Be especially careful in any public appearance, and they must have the necessary authorisation to speak to the media, participate in professional conferences or seminars, and in any other event that may be publicly disseminated (including comments on social media) whenever they appear in their capacity as employees of the Lamp Group.
- Any affiliation or association of employees with political parties shall be on a personal basis and shall be completely unrelated to the activities of the company.

4.3.5 Loyalty to the company

The Lamp Group builds loyalty to the company by engaging its employees in a participatory relationship in which the company and the employee cooperate and take responsibility for achieving shared interests.

In the Group's companies, work must be carried out in an efficient manner in a cooperative and committed environment.

Therefore, Lamp's employees agree to:

- Use the company's resources responsibly, protecting them from any improper use. This applies both to the company's physical assets and to ensuring the reliable and rigorous handling of public information, as well as information that requires strict confidentiality.
- Keep any confidential information that they obtain in the course of their work strictly confidential, so that it cannot be used inappropriately, and to refrain from using it improperly for their own benefit or that of third parties.
- Preserving the company's knowledge, enabling it to be disseminated to other Group employees and sharing it with the knowledge management systems put in place within the Lamp Group, so that lessons can be learnt from his/her experience.

- Refrain from competing with the company's business and to help improve productivity and make the biggest possible contribution to the processes in which he/she participates.
- Fulfil all obligations arising from his/her employment contract and the applicable employment legislation.
- Work with a spirit of cooperation, sharing the knowledge and resources at his/her disposal with the other people in the company to help them fulfil the Group's mission.
- Use resources and access the IT systems provided by the company in a professional and responsible manner, in accordance with "Annex V" of the Quality Manual on the Personal data protection policy and rules for the proper use of Information Systems equipment, tools, devices and applications.
- Always act with integrity when dealing with customers. Refrain from offering advantages or benefits to some customers to the detriment of others.
- Strive to best meet our customers' expectations and make every effort to anticipate their needs.
- Maintain a direct relationship with customers, based on sincerity, honesty, loyalty and transparency.
- Provide a reliable service and employ the necessary resources and professionalism to resolve any problems that may affect customers, committing to the values of good treatment, care, respect, honesty and service.
- Take the utmost care to protect the company's reputation.
- Provide appropriate, accurate and timely information and advice.

4.3.6 Anti-corruption

The Lamp Group rejects any form of corruption, bribery or extortion and is opposed to influencing the decisions of people outside the organisation to obtain any benefit through the use of unethical practices, and the use of such practices with its employees. It shall also not accept other individuals or entities using such practices with its employees.

Lamp's staff shall not accept cash or cash-equivalent gifts for any amount (e.g. shares or any form of negotiable securities) or generally accept gifts whose value or nature are in excess of courtesy gifts, which are intended to improperly influence their business, professional or administrative dealings, whether with public or private entities.

In any event, courtesy gifts shall never take the form of cash payments and must always be authorised by the appropriate senior manager. These gifts must always be received at head office and retained for an annual prize draw.

The company's policy on gifts is basically customer-focused and their value must never be in excess of courtesy gifts.

As part of its anti-corruption protocol, Lamp's Corporate Social Responsibility Committee has established the obligation of preventing and managing possible conflicts of interest that may arise at hierarchical or family levels within the company. Employees, managers and board members shall refrain from participating in decisions or situations where a conflict of interest exists or may be perceived to exist which would affect their impartiality or objectivity in the exercise of their duties.

In particular, care shall be taken to avoid:

- Hierarchical conflicts: where a line manager may make decisions that directly or indirectly benefit a member of his/her team or him/herself inappropriately.
- Family conflicts: where an employee or manager may unduly favour close family members, either through recruitment decisions, promotions, the awarding of contracts or any other action involving preferential treatment.

All Lamp staff shall proactively report any situation that may constitute or be perceived as a conflict of interest, ensuring that all decisions are made in a fully transparent manner and in the best interests of the company.

Failure to abide by this principle may result in disciplinary action ranging from administrative sanctions to termination of employment, depending on the severity of the case.

Additionally, while performing their professional duties, employees shall ensure compliance with the established internal controls in order to prevent irregularities and undue advantages in the company's dealings with third parties.

5. VALIDITY

This Code of Conduct shall be reviewed annually by the CSR Committee.

6. WHISTLEBLOWING CHANNEL

In order to provide a secure, confidential and accessible means for all employees, contractors and anyone connected with Lamp to report suspected instances of corruption and other forms of misconduct, we created the [Whistleblowing Channel](#), a vital tool for the effective implementation of the Code of Conduct and anti-corruption protocol.

Through the Whistleblowing Channel, Lamp seeks to:

- Detect any irregularities quickly.
- Detect instances of corruption at an early stage, enabling a swift and effective response.
- Prevent further damage by acting in a timely manner and to prevent minor irregularities from becoming major problems that affect the organisation's reputation and resources.
- Promote transparency and trust.
- Promote an environment in which Lamp's staff feel secure and confident that they can report misconduct without fear of reprisal.
- Improve morale: Employees have greater confidence in the integrity of the organisation, which can improve morale and loyalty to the company.
- Comply with current legislation by abiding by the current laws and regulations
- Manage any potential reputational risks.
- Strengthen public and customer confidence in the integrity and ethics of the organisation.
- Ensure the anonymity of the whistleblower, reducing the fear of possible reprisals.
- Establish clear and efficient procedures for receiving, investigating and dealing with complaints.

7. ACCEPTANCE OF AND COMPLIANCE WITH THE CODE

Compliance with this Code of Conduct is mandatory for all employees, managers, board members and professionals of the Group, and for future recruits, who must accept the terms of this Code of Conduct and, in particular, the vision, values and rules of conduct set out herein.

Response to breaches

Failure to comply with the provisions of the Code of Conduct or its implementing rules exposes Lamp to the threat of legal action.

In the event of a breach of the provisions of the Code of Conduct, the companies of the Lamp Group must respond immediately in accordance with the applicable regulatory framework and take any appropriate legal action to which they are entitled. The response shall be proportionate to the severity of the breach, irrespective of the hierarchical position of the individuals involved, be they employees, managers, board members or even third parties with whom business relations are maintained.

8. ANNEX FOR ACCEPTANCE OF AND COMPLIANCE WITH THE CODE

Received: Signed by: Employee

Full name, ID card no. and date:

With this signature I declare that I have read the entire document and accept all of its terms and conditions.