

PUTTING INTEGRITY INTO ACTION

CODE OF CONDUCT

LUQOM
G R O U P

CODE OF CONDUCT

Putting Integrity Into Action



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Foreword

Dear colleague,
Dear customer,
Dear business partner,

At LUQOM Group, we care about doing the right thing and strive to build an ethical and sustainable culture. We share a commitment to making a positive difference in everything we do.

The Code of Conduct is a collection of the most important standards of behavior, not only for already existing legal obligations, but also for ethical and moral aspects. It provides us with guiding principles to navigate compliance and ethical questions and to promote diversity in our LUQOM family. Thereby, it protects us in our daily work from making wrong decisions or not behaving in accordance with the law, whether intentionally or unintentionally.

We believe that ethical and sustainable behavior is the foundation of our success. This Code of Conduct is a promise to our colleagues, customers, and business partners that we will always act in a supportive, ethical, and lawful manner and keep our commitments to our stakeholders. We should not compromise the company's reputation or our personal integrity.

To anchor the application of the standards of the Code of Conduct in our corporate culture, we require all our employees and managers to participate in the compliance trainings offered at regular intervals.

Each and every one of us, especially we as LUQOM management, is responsible for bringing this compliance culture to life and putting the Code of Conduct into action.

Thank you.



Vanessa Stütze
CEO



& Dr. Oliver Merz
Deputy CEO & CFO

1. OUR CODE OF CONDUCT & OUR CORE VALUES

Our Code of Conduct builds on our core values by providing greater detail about expected behaviors. It drives our culture of compliance, ethical conduct, and accountability.

It starts with a simple proposition – we always act with integrity, and we always act in compliance with the law. Besides being the right thing to do and protecting LUQOM, acting with integrity and in compliance with laws improves our performance and reflects on our character as a business – to our customers, our business partners, and the public at large – and enables us to attract and retain top talent.

The behavioral standards set out in our Code of Conduct can be supplemented and substantiated by topic-specific guidelines, which, like this Code of Conduct, are to be adhered to by every one of us while doing business for LUQOM.

In addition to following the Code, each of us has an important responsibility to know and follow the laws that apply, wherever we work. The Code is a starting point and is not intended to describe every law, policy, procedure, or business process that applies to your work at LUQOM. Make sure you know the rules that apply to you.

If the applicable laws, regulations or standards of the country or area where we operate and the Code of Conduct have provisions with respect to the same subject that do not conflict, the provisions with higher requirements shall prevail. If any provision in the Code of Conduct conflicts with any applicable laws, regulations, or standards of the country or area where we operate, so that compliance with the Code of Conduct is illegal, the applicable laws, regulations, or standards shall prevail. In this case you should inform the Legal & Compliance department of LUQOM Holding GmbH under compliance@luqom.com about the conflicting regulation.

If you have questions about the laws that apply to your activities, contact your local contact person for legal requests or your company's compliance representative.

1.1 Our core values

Our four enduring core values shape the culture and define the character of LUQOM. They serve as a foundation for how we act and make decisions.

LUQOM's Values are defined as:

CUSTOMER CENTRICITY

Our customers, both internally and externally, are at the center of everything we do. Their wellbeing is our main responsibility.

OWNERSHIP & COMMITMENT

We grow our business with passion, commitment, and resilience. We take responsibility for what we do and always give our best.

GROWTH MINDSET

We are innovative strategists, we turn ideas into opportunities and opportunities into projects. We approach challenges in a pragmatic way to move things forward and strive to get better every day.

SUSTAINABILITY

We act sustainably with a vision for the next generations. We strive to enhance people's wellbeing. We take care and support each other. We do everything possible to have a positive impact on our environment. We recognize that sustainability is the key for our long-term business success.

1.2 Who must comply

At LUQOM, the Code of Conduct (the Code) is the cornerstone of our commitment to conducting business legally, ethically and with integrity.

The Code applies to all employees (including full-time, part-time, and supplemental or temporary employees) of Lampenwelt, QLF, Lampemesteren and LUQOM Asia and, in general, all LUQOM entities as members of the LUQOM family.

We also expect all consultants and contractors working for LUQOM to follow the Code in connection with their work for LUQOM or one of its entities.

What do we mean by LUQOM entity?

"LUQOM entity" means any entity that is consolidated in LUQOM's financial statements or otherwise controlled by LUQOM.

1.3 Asking questions

If you have any questions about your responsibilities or any of the information in the Code, please ask the Legal & Compliance department of LUQOM Holding GmbH, available under compliance@luqom.com, or your company's compliance representative.

1.4 Regulatory responsibility

The responsibility for updating and communicating the standards set out in the Code is borne by the Legal & Compliance department of LUQOM Holding GmbH.

If you have any suggestions relating to the Code, we encourage you to provide your ideas to compliance@luqom.com. These may be incorporated if judged useful for achieving LUQOM's goals for our corporate culture and how we interact amongst ourselves and with our partners.

2. PROFESSIONAL BEHAVIOR

We conduct ourselves in accordance with the highest standards of professional behavior.

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Whether at work, traveling on business, communicating online, or attending training or social events with colleagues or customers, we are always “LUQOM ambassadors.” Our behavior reflects both on ourselves as well as on LUQOM.

Good professional conduct is especially important because our individual behaviors impact our colleagues, our customers, our communities and ultimately, the success of our company.

We are proud to be LUQOM ambassadors, and we act accordingly.

2.1 Compliance

We behave honestly, by obeying the law, our policies, our Code of Conduct and by always doing the right thing. We do not engage in unfair business practices or illegal activities like fraud, theft, bribery, insider trading or harassment. We never abandon our ethical values for the sake of profits or personal gain.

2.2 Mutual respect

We treat each other with fairness, dignity, and respect. We value individual differences and the quality of ideas and innovation that come from those differences.

2.3 Accountability

We honor commitments, deliver on our promises, and take responsibility for our decisions. We never use a contractor, consultant or other third party to perform any illegal act or violate LUQOM policy.

2.4 Courage

We report any situation or action that we believe violates our policies, the Code of Conduct, or the law. We never retaliate against those who speak up.

2.5 Ethical leadership

Regardless of our position or level, we rely on LUQOM’s values and Code of Conduct as our guide. We consider the consequences of our decisions on LUQOM’s reputation. We avoid conflicts between our personal interests and those of LUQOM.

2.6 Commitment to customers and partners

We always focus on the needs of our customers and partners with whom we do business.

2.7 Additional manager responsibilities

As a manager at LUQOM, we lead by example, creating a work culture that promotes integrity and reinforces the Code and our supporting policies.

- Managers will ensure their employees know what is expected of them, are comfortable seeking guidance when they have questions and can raise concerns without fear of retaliation.
- Managers may never engage in - or allow - retaliation against someone for reporting suspected misconduct.
- Managers will ensure that their employees and business partners apply the standards of conduct set out in the Code.
- Managers have a special obligation to report and respond to any behavior that they think could violate the law, the Code, or our policies.
- If you feel unsure of the answer to an employee's question or concern, contact the resources listed in the Code (see section 12.1).

3. OUR EMPLOYEES

3.1 Commitment to human rights

LUQOM is committed to respecting human rights and conducting business legally, ethically and with integrity. As part of this commitment, LUQOM respects the universal rights laid out in the Universal Bill of Human Rights and the commitments made by signing the UN Global Compact.

3.2 Fair treatment & diversity

We believe in treating each other with respect and dignity. We judge all applicants and employees by their qualifications, demonstrated skills and achievements without regard to race, color, religion, gender, gender identity or expression, national origin, ethnicity, sexual orientation, sex, age, disability, marital status, or any other characteristic protected by local law.

We are proud to actively promote diversity in our workforce and the workforces of those with whom we do business. We respect and value individuals for their diverse backgrounds, experiences, styles, approaches, and ideas. We rely upon diversity to inspire innovation that drives our business, enhances our competitive advantage, and serves customers across the world.

Disrespectful behavior and harassment can take many forms including but not limited to:

- Abusive, threatening, bullying, or intimidating behavior
- Targeted vulgarity and rudeness
- Repeated blatant disregard by an individual for another person's personal time
- Harassment based on personal characteristics
- Deliberate exclusion or continued isolation from work social activities (including by speaking in a language that others do not understand with the intent of such exclusion or isolation)
- Displays of offensive material or offensive jokes
- Unwanted physical contact
- Making fun of a person's accent or way of speaking

- Microaggressions or micro-inequities that negatively affect another’s workplace experience; examples include, but are not limited to:
 - Insensitive jokes or demeaning comments
 - Frequently interrupting colleagues or taking credit for their work
 - Failing to acknowledge certain employees’ contributions
 - Disrespectful or insensitive conduct or stereotyping based on personal characteristics leading to a feeling of being singled out or belittled due to their identity
- Sexual harassment or other unwanted conduct which has the purpose or effect of violating someone’s dignity

Sexual harassment involves, from the recipient’s point of view, unwanted conduct of a sexual nature and includes, but is not limited to, the examples above, as well as:

- Sexually suggestive, lewd, or indecent comments, jokes, pictures, or other materials
- Repeated unwanted attention, such as requests for meeting up socially or phone calls, texts, or messages to an individual without a work-related reason
- Unwanted physical contact of a sexual nature or displays of affection
- When a person in a position of power implies that employment decisions may be affected by acceptance or rejection of sexual advances

We expect all our people, regardless of seniority, position, or contribution to LUQOM, to treat each other – and others we interact with in work-related situations, whether in person or online – with dignity, respect, and professional courtesy. This includes customer and supplier personnel, advisors to our customers and hotel, restaurant, and airline staff.

3.3 Health, safety & security

We are committed to providing a safe and healthy work environment and preventing accidents. We must observe the health and safety rules and practices that apply to our job and protect ourselves and our coworkers, including immediately reporting accidents, injuries, and unsafe conditions to the department responsible for occupational safety or via the whistleblower helpline (see section 12.4).

A safe and secure work environment also means a workplace free from violence. Report any violence, intimidation, or threats of violence as soon as possible to your HR department, your company’s compliance representative or via the whistleblower helpline.

3.4 Alcohol & substance abuse

LUQOM expects employees to report to work able to perform their duties and free from the influence of alcohol, legal or illegal drugs, or the abuse of prescribed or over-the-counter drugs. Using, possessing, buying, or selling legal or illegal drugs or abusing controlled substances while on the job, on LUQOM premises, operating LUQOM property (including company vehicles) or engaging in LUQOM business is prohibited and is grounds for disciplinary action, including termination of employment.

4. CONFLICTS OF INTEREST

We should avoid situations that may involve a conflict, or even the appearance of a conflict, between our personal interests and LUQOM's legitimate business interests. Immediately disclose any situation that may be or could appear to be a conflict of interest to your manager, your company's compliance representative or report it via the whistleblower helpline and remove yourself from any related decision-making process.

When faced with a potential conflict of interest, ask yourself:

- Does this benefit (or could it be perceived to benefit) me, my family, or another business, in conflict with LUQOM's legitimate business interests?
- Would this activity, if publicized, harm my reputation, my ability to do my job or embarrass LUQOM?

4.1 Outside employment

Any outside business activity must be strictly separate from your employment at LUQOM, should not compete with LUQOM interests, and should not harm your job performance at LUQOM. We may not work for or receive payment for services from any third party who interacts with LUQOM, including LUQOM's suppliers, customers, competitors, or regulators without prior written approval from our HR department. We may not use LUQOM assets for any outside business activity without prior written approval from our HR department.

4.2 Family members & close personal relationships

If our family members, or people with whom we are in close personal relationships, are or may become involved in a business activity related to LUQOM, including acting as a LUQOM supplier, customer, or vendor, we should immediately disclose the nature of the relationship to our manager or our company's compliance representative and must remove ourselves from any related decision-making process. If we supervise or are able to exercise influence over any aspect of the performance, compensation or advancement of a family member or someone with whom we have a close personal relationship, we must report this relationship to Human Resources.

5. LUQOM INFORMATION & COMMUNICATION SYSTEMS

LUQOM's information and communication systems, including telephones and connections to the Internet, are vital to LUQOM's business and should only be used for appropriate business-related purposes. We may use them for conducting LUQOM business or for other incidental purposes authorized by our management such as occasional personal use of the telephone, email and the Internet that does not interfere with company work. We may not use LUQOM systems to visit Internet sites that feature sexual content, gambling or that advocate intolerance of others. We also may not use them in a manner that interferes with anyone's productivity.

6. PRIVACY & DATA PROTECTION

LUQOM respects the privacy of our customers, consumers, and employees in accordance with privacy and data protection laws. Our customers, consumers and others must be able to trust that we will only collect, store, share and use their personal information for defined legitimate business purposes and to support and enhance our relationships with them. We do not sell our customers' personal information. We appropriately safeguard our customers' information and comply with internal policies and applicable laws.

In addition, we protect and appropriately use the personal information of our employees in accordance with all legal requirements. However, employees are advised that workspace and items provided to us by LUQOM, including computers, email systems and telephone voice mail, are the property of LUQOM.

If you believe that customer or employee data is being compromised, or is in an unsafe condition or status, contact your company's compliance representative, your responsible contact person for data protection or report it via the whistleblower helpline.

7. LUQOM INTELLECTUAL PROPERTY RIGHTS

Business opportunities and inventions developed through work belong firstly to LUQOM, except as otherwise agreed by LUQOM. Developing or helping to develop inventions or other intellectual property, during or after work hours, that: 1) relate to LUQOM's existing or reasonably anticipated products or services, 2) relate to your position at LUQOM or 3) are developed using LUQOM's corporate resources, are subject to the provisions of your employee agreement.

8. GIFTS, ENTERTAINMENT & CORPORATE HOSPITALITY

Our relationships with suppliers, customers and others must be based entirely on sound business decisions and fair dealing. Business gifts, entertainment and corporate hospitality can help build relationships, but they can also make it harder to be objective about the person or company providing them.

8.1 Giving & receiving gifts

LUQOM employees, consultants or contractors may not offer gifts to, or receive gifts from, our suppliers, customers, or other business-related entities unless all the following four conditions apply:

1) Moderate value

This value varies by country. An inexpensive courtesy gift such as a promotional item has a "moderate value" anywhere. Contact your company's compliance representative for guidance on what gifts may be accepted or provided.

2) Customary and appropriate

The item is considered a customary and appropriate business gift in the country where it is offered and offering or accepting it would not reflect poorly on LUQOM if the details were made public.

3) No favored treatment

The gift is not offered in expectation of special or favored treatment.

4) Legal and approved

Offering or accepting the gift is legal in the location and under the circumstances in which it is given and does not violate the policies of the giver or the recipient. The giver and recipient have both received appropriate approval to offer/accept the gift.

8.2 Anti-corruption laws & bribery

We comply with the anti-corruption treaties and laws of the countries in which we do business. We will not directly or indirectly offer or give anything of value to any person, including to government officials, to influence official action or to secure an improper advantage. Anything of value includes cash or cash equivalents, gifts, meals, travel, political or charitable contributions and job offers. These requirements apply both to LUQOM employees and representatives as well as to our partners, agents or other third parties working on LUQOM's behalf no matter where they are doing business.

No LUQOM employee or representative will suffer any retaliation for refusing to pay or take a bribe or kickback, even if this results in a loss of business to LUQOM.

8.3 Treating our business partners as we would like to be treated ourselves

We treat customers, competitors, and suppliers fairly in all our activities. We will not manipulate or abuse confidential information. We base our decisions on legitimate business-related criteria, not on personal relationships or interests. When deciding among competing suppliers of any size, we should weigh the facts honestly and impartially and follow LUQOM's procurement process. We seek to do business with organizations that follow the law and our Code of Conduct.

9. FAIR COMPETITION

Free and fair competition are basic requirements for our business activities. Our success is not built on the basis of unethical illegal business practices, but rather on our outstanding product range and professional services.

Many countries have anti-trust regulations to enable free and fair competition. We respect these regulations as binding requirements for relationships with our competitors, distributors and resellers.

In particular, when dealing with competitors, we should

- not misappropriate and/or misuse competitors' confidential information,

- ensure that we do not make false statements about competitors' businesses,
- not enter into agreements involving activities constituting anti-competitive behavior, e.g. illegal price-fixing, and
- collect competitive information only through legally permitted sources and means.

If you have a question about the legality of a certain practice, contact your local contact person for legal requests.

10. EXTERNAL COMMUNICATIONS / MEDIA RELATIONS

If we provide information to the public or to the media, we need an expressive, consistent, and truthful voice. That is why we will not make statements to news media on LUQOM's behalf, or provide company information to outside parties, without authorization.

Good judgment and common sense must always be used when posting on social media outlets. Everyone is solely responsible for what he or she posts online. Remember, once a statement is posted, it cannot be retracted. Consider how the public will view your comments.

Contact your local contact person for communication or your company's compliance representative if you're contacted by the media, by members of the investment community or if you have any questions. This also applies in case you see something online that could be harmful to the company. Please don't respond to negative comments yourself.

11. ENVIRONMENTAL RESPONSIBILITY

We foster environmentally sustainable growth for our company and our stakeholders.

We incorporate leading environmental practices into our business strategy and operations. We focus our actions on three areas:

- Reducing our CO2 footprint
- Reducing our waste
- Engaging with our people, leaders, business partners and other stakeholders

We strive to minimize negative environmental impacts.

We have committed to reduce our carbon emissions to mitigate the impact of climate change. Our efforts to minimize negative environmental impacts also include improving our energy efficiency, decreasing our water consumption, and reducing our waste. You are part of this journey, your contribution, be it big or small, is essential for LUQOM to reach its environmental goals. Therefore, all LUQOM Group employees are encouraged to minimize the consumption of fresh water, the production of waste, and our corporate carbon footprint.

We comply with all applicable environmental laws and regulations.

12. VIOLATION OF OUR CODE OF CONDUCT

Any violation of this Code is a serious matter. A breach can put the company, our employees and our products or services at substantial risk. Every employee is accountable for his or her own behavior.

Failure to follow the Code, or violation of the policies described in the Code, can result in disciplinary action, including termination of employment as well as criminal investigations. Failure of any contractor or consultant to follow the Code can result in the termination of their relationship with LUQOM.

12.1 Reporting concerns and seeking guidance

We must never conceal anyone's failure to comply with the Code, LUQOM policies or the law.

You should promptly report any conduct that:

- Seems unethical, illegal, or suspicious
- May violate the Code
- May violate any policies or procedures

You can raise concerns at any time with your manager (provided your manager is not involved in the violation) or another manager you trust, your company's compliance representative or you can report it via the whistleblower helpline.

12.2 Investigating and resolving issues

LUQOM will give serious attention to every incoming concern and will investigate issues raised by employees or others when necessary. All employees, contractors and consultants are required to cooperate fully with investigations and audits conducted by LUQOM or governmental authorities. This means providing information, LUQOM issued equipment such as computers or smartphones, documents, and personal interviews. Failure to cooperate, including misleading, lying, destroying, or altering documents or records, or failing to respond promptly to requests for information by investigators or auditors, is grounds for disciplinary action up to and including termination of employment as well as criminal investigations. LUQOM may report misconduct to the appropriate authorities. Consult LUQOM's Legal & Compliance department under compliance@luqom.com or your company's compliance representative before responding to non-routine requests for audits, investigations, or information from parties outside of LUQOM.

12.3 Non-retaliation

LUQOM does not tolerate retaliation against any employee, consultant, or contractor for reporting an issue or raising a concern he or she believes to be true, cooperating with an investigation or audit, or refusing to participate in activities that violate the Code, laws, or company policies. This Code protects anyone who makes a report in good faith, even if he or she is found to be mistaken. Anyone who engages in retaliation will be subject to disciplinary action, including termination of

employment. If you believe you were retaliated against, report the matter immediately to LUQOM's Legal & Compliance department under compliance@luqom.com or your company's Compliance representative.

12.4 The whistleblower helpline

The whistleblower helpline allows you to report a concern or ask a question online 24 hours a day, 7 days a week. The whistleblower helpline is operated by an independent, outside company. Information received through the whistleblower helpline is referred to LUQOM's Legal & Compliance department or to your company's compliance representative. Every report is assessed and taken seriously. The whistleblower helpline is committed to protecting your confidentiality, to the extent possible. You can raise issues anonymously if you prefer. Although your name is not required to address most concerns, a more thorough investigation can be conducted if you identify yourself.

Due to legal restrictions, anonymous reporting through the whistleblower helpline may not be permitted in certain countries. Some countries also limit the types of issues that can be reported using this resource. If the whistleblower helpline is not available in your country, please contact one of the other available LUQOM resources (see section 12.1).

Contact the whistleblower helpline online and file a report at [**https://luqomgroup.integrityline.com**](https://luqomgroup.integrityline.com)

Versioning

Approval	On	By	Signature
Management of LUQOM GmbH	March 21, 2022	Dr. Oliver Merz, Dr. Christian Korte	Approved by mail
Management of Holding GmbH	March 21, 2022	Dr. Oliver Merz, Dr. Christian Korte	Approved by mail
Management of Lampenwelt GmbH	March 24, 2022	Thomas Rebmann, David Doust, Ales Drábek	Approved by mail
Management of Lampenwelt Logistik GmbH	March 24, 2022	Thomas Rebmann	Approved by mail
Management of QLF Group	April 04, 2022	Ard Huisert, Lucas Verhagen, Bas Lemmers	Approved by mail
Management of Lampemesteren A/S	March 25, 2022	Morten Brændgaard	Approved by mail
Management of LUQOM Asia Ltd.	March 24, 2022	Ludger Tillmann	Approved by mail
Management of LUQOM Marketplaces GmbH	March 24, 2022	Ales Drábek, Dr. Oliver Merz	Approved by mail
Management of LUQOM Marketing Services GmbH	April 04, 2022	David Doust	Approved by mail
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V1.2	Jana Gäbler	May 31, 2022	Adjustment of foreword
V1.3	Jana Gäbler	June, 02, 2022	Adjustment of scope of application
V 1.4	Group Legal & Compliance	November 06, 2023	Editorial revision



POSSIBILITIES, TO SPEAK UP

 **E-Mail:** compliance@luqom.com

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