

Lorama Supplier Code of Conduct

Purpose and Scope

At Lorama Group, we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. Lorama Group has developed a Supplier Code of Conduct to clarify our expectations in the areas of business integrity, labor practices, human rights, health and safety, and environmental management.

All suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with Lorama Group (hereinafter referred to as “suppliers”) are expected to comply with the principles and directives of this Code at all times.

Business Conduct Principles

As a supplier of Lorama Group, you are committed to conducting business responsibly, with integrity, honesty, and transparency, and to adhere to the following principles:

Maintain awareness of and compliance with all applicable laws and regulations of the countries in which you operate.

Compete fairly, without paying bribes, kickbacks, or giving anything of value to secure an unfair advantage. As a supplier, you are committed to conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. While bribery is strictly prohibited in any situation, it is especially important to be mindful of these obligations in the following circumstances:

- *Customs brokerage*
- *Sales and marketing*
- *Dealings with government officials*
- *Operations in high-risk foreign countries identified by Transparency International*

Commit to the protection of human rights and not engaging in child labor and forced labor.

Suppliers are required to comply with all applicable local and international laws and regulations regarding child labor and forced labor in the jurisdictions where they operate (including all direct and indirect operations) including both international conventions and local labor laws.

Child Labor: the supplier shall not engage in or support the use of child labor in any aspect of their operations. All employment must comply with the minimum age provisions of national laws and regulations. When young workers are employed, the Supplier must ensure that the kind of work is not hazardous and does not jeopardize their education or development.

Forced Labor: the supplier must ensure that all forms of forced or compulsory labor (including any form of coercion, bonded labor, or human trafficking) are abolished from all aspects of their operations, including any work or service exacted from any individual under the threat or penalty and for which the individual has not offered themselves voluntarily.

Rights and Responsibilities: suppliers have the responsibility to ensure that child labor and forced labor are not present in any aspect of their operations, including, but not limited to, production, subcontracting, and recruitment practices. Lorama Group reserves the right to terminate contracts or business relationships with suppliers found to be in violation of this policy.

Enforcement Mechanisms: suppliers agree to participate in regular audits or due diligence procedures by Lorama Group to verify compliance with this policy and to address and identify issues promptly. Non-compliance with this Code may result in corrective action requirements, termination of contracts, or other appropriate measures as determined by Lorama Group.

Reporting and Transparency: suppliers must provide accessible channels for employees to report grievances or violations of this policy without fear of retaliation. Suppliers must also commit to maintaining transparency in their operations and supply chains and providing all necessary information to verify compliance with this Code.

Remediation: in cases where non-compliance has been identified, suppliers must take immediate and effective corrective action to remedy the violations in a timely manner. Suppliers are expected to provide necessary support and remediation to any victims of human rights abuses, including child labor and forced labor, within their operations and supply chains.

Encourage a diverse workforce and provide a workplace free from discrimination, harassment, or any other form of abuse. As a supplier, you are committed to creating a work environment in which employees and business partners feel valued and respected for their contributions. Suppliers shall uphold the highest standards of human rights and ensure that their operations and supply chains are free from human rights abuses, including respecting the rights of workers, indigenous peoples, and local communities. Suppliers are expected to ensure an inclusive workplace environment free from discrimination based on race, color, gender, language, religion, political or other opinions, national or social origin, property, birth, or other status. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive, or hostile work environment will not be tolerated.

Treat employees fairly, including with respect to wages, working hours, and benefits. Suppliers are expected to comply with all applicable legal and regulatory requirements and generally apply sound employee relations practices. Working hours, wages, and benefits will be consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation, and legally mandated benefits.

Provide safe and healthy working conditions. Suppliers are to proactively manage health and safety risk to provide an incident-free environment where occupational injuries and illnesses are prevented. Management systems and controls that identify hazards and assess/control risk should be implemented.



Respect employees' right to freedom of association and collective bargaining. As a supplier, you must respect your employees' rights to join or refrain from joining associations and worker organizations.

Protect the global environment. Suppliers are expected to conduct operations with care for the environment and in compliance with all applicable environmental laws and regulations.

Deliver products and services meeting applicable quality and safety standards. As a supplier, you are committed to producing high quality products while meeting regulations with respect to developing, handling, packaging, or storing our products. You have established and enforced product quality standards policies, specifications, procedures, and testing protocols that apply to all products that you supply to Lorama Group.

This policy may be updated or revised as necessary to reflect changes in laws, regulations, or company requirements related to the prevention of child labor and forced labor in the supply chain.

A handwritten signature in blue ink, appearing to read "A. Burnett", written over a thin horizontal line.

Andrew Burnett
Chief Executive Officer