	TECHNICAL INSTRUCTIONS IT-027 ETHICAL CODE	Edition nº 2 Date: 06/2023
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CODE OF ETHICS




YEAR 2023

EDITION Nº	DATE	SUMMARY OF CHANGES
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1. OBJECT

The Code of Ethics of the Lamp Group aims to establish the basic principles and guidelines that must govern the ethical behavior of all its administrators and employees in their daily performance, with regard to the relationships and interactions they maintain with all their stakeholders.

The Lamp Group is integrated into Experience Brands, one of the largest manufacturers of technical and architectural lighting in Europe, both in indoor and outdoor luminaires. The application of this Code refers to LAMP, S.A.U., as well as the Group of companies headed by said company, which includes all the companies that it directly or indirectly controls, excluding the companies that are part of Experience Brands.


This Code of Ethics constitutes an action guide to ensure appropriate behavior in the professional performance of its employees, in accordance with both the laws of each of the countries where the Lamp Group develops its activities and the established Regulatory System, respecting the values of their respective cultures.

The Lamp Group will ensure that the principles established in this Code are observed in all the companies in which it participates.

2. SCOPE OF APPLICATION

This Code applies to all companies and companies of the Lamp Group, as well as those in which it has responsibility for management, regardless of the country in which it carries out its activities.

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

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3. PURPOSE, MISSION AND VALUES OF THE LAMP GROUP

PURPOSE. We create lighting solutions that respond to new ways of life by providing well-being through good lighting, generating a positive impact on both people and the environment.

At Lamp we are *work* and *attitude*, we are *Worktitude for Light*.

To make our vision a reality, we work guided by our three strategic axes or *Working Paths*:

Worktitude for Wellbeing

We understand lighting as a fundamental element to improve people's well-being, analyzing the visual and non-visual effects of light.

Worktitude for Innovation

We promote and adopt innovation projects aimed at constant improvement in a transversal way, understanding that innovation is a systemic and systematic process.

Worktitude for Life

We promote projects that generate a positive impact on the environment and promote a more sustainable lighting industry.


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

We advise, design, produce, market and implement technical lighting projects. It is the Lamp seal, a commitment that we have maintained for more than 50 years: to turn the lighting challenges of our clients into reality with a solvent and tailored response in any architectural project in the world.

VALUES.

Integrity, from the catalogue to the space to be illuminated: From the first sketch to the start-up. We extend the know-how of our team and the versatility of our products and production

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systems from the beginning to the end. We believe that a project only ends when a user is using it. We think, test, manufacture and distribute worldwide so that every architectural project shines with the light it needs. Our proposal: a modular product catalog that we can customize


to offer the optimal solution for each challenge. It is the Lamp commitment, a style that gives light to your projects.

Involvement, listening, understanding, responding: Complex projects require agile, realistic and timely contributions. Also closeness and common sense. An interior and exterior architectural project is the result of the sum of infinite ideas and efforts. We align ourselves to this rhythm with flexibility and adaptation. We work hand in hand anywhere in the world to offer the result that our customers imagine and guarantee solutions that shine with their own light. We connect our talent with customers, suppliers, partners and industrial professionals to make the project we have at the shared work table a reality.

Pragmatism and solvency, Lamp designs the light that our clients' projects need: Nothing more, but nothing less. Our motivation is to illuminate the projects that come to the table with ingenuity and efficiency. We combine design and engineering to turn what is possible into reality. We are heirs of the design of Barcelona and the industrial tradition of Terrassa, where we were born in 1972, and from where we operate internationally. It is the industrial spirit that is rooted in our family history, a professional and vital "savoir faire" that has driven our brand around the world.

Sensitivity to light, a passion that transcends our company: In our DNA vibrates the passion to innovate, create and offer lighting solutions that work. More than products, we are light. A feeling that we share each of the professionals who are part of Lamp and that we extend outside our organization together with schools, entities and associations related to design. Enlightenment means teaching, lecturing, sharing knowledge. In addition, since 2008 we organize the Lamp Awards through an independent international jury that recognizes biannually

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the good use of light and serves as a fair reward of its importance. It is the best legacy of our sensitivity to light.

4. GUIDELINES OF CONDUCT AND RESPONSIBLE PRACTICES

The Code of Ethics establishes specific guidelines for action in the following content areas:

4.1 Respect for people

The Lamp Group rejects any manifestation of physical, psychological, moral harassment or abuse of authority, as well as any other conduct that may generate an intimidating or offensive environment with the rights of people.


Employees should treat each other with respect by fostering cordial relationships and a pleasant, healthy and safe work environment.

Whenever a new employee is integrated into the Lamp Group, he or she must be welcomed by his colleagues in the best possible way, providing him with the necessary knowledge to adapt and integrate. Learning and experiences should be shared to promote the good development of the work.

The process of integrating new staff includes the **collaboration** of the entire team so that new employees adapt easily to the organization of the company and shorten the **learning time** of their new functions.

All employees have an obligation to treat their colleagues, superiors and subordinates fairly and respectfully. In the same way, the relations between the employees of the Group and those of the companies or external collaborating entities will be based on professional respect and mutual collaboration.

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The Lamp Group considers the integral development of the person to be important, so it will facilitate the necessary balance between professional and personal life.

4.2 Child labour

Lamp does not tolerate child labour. Therefore, their suppliers of goods and services must guarantee that they will not employ, directly or indirectly, those people who do not have the minimum legal age to work in Spain, and that they implement the necessary measures to avoid child labor by prohibiting admission to work to children under sixteen years of age.

4.3 Forced labour

Lamp, its suppliers of goods and services, and business partners shall not employ forced labor. All work must be voluntary, and employees must be free to leave their workplace after completing their workday, or terminate their employment contract at any time upon notice to the employer. Any form of direct or indirect withholding is reproached. Contract labour must not be abused, and any practice that facilitates or contributes to forced labour is prohibited.

4.4 Safety and Health at Work

The companies of the Lamp Group will promote a program of safety and health at work and will adopt the preventive measures established in this regard in the current legislation and any others that may be established in the future.

The professionals of the Group's companies will observe with special attention the rules related to safety and health at work, with the aim of preventing and minimizing occupational risks, accidents and injuries caused during work activity or associated with it, by limiting to the extent reasonably practical, the causes of risk inherent in said work environment.


4.5 Freedom of Association and the Right to Collective Bargaining

Lamp undertakes to respect freedom of association and collective organization and bargaining, without suffering any type of sanction and reprimand.

4.6 Discrimination

The Lamp Group will respect the personal dignity, privacy and rights of each worker and is committed to providing a work environment in which there are no situations of discrimination

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or harassment. In such a way that employees must not discriminate with respect to origin, nationality, religion, race, gender, age or sexual orientation, nor must they have any type of verbal or physical harassment behavior based on the aforementioned or any other reason.

4.7 Respect for the environment

The Lamp Group will respect all regulations relating to environmental protection and is committed to sustainability. That is why we must respect and comply with the behaviors established by the Guide to Good Environmental Practices, as well as the internal policies and procedures in force.

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

We believe that giving life to a space requires the shared effort of many companies and professionals who work responsibly **with the aim of reducing environmental impact throughout the entire value chain**. We do our bit by providing **realistic, efficient, sustainable solutions aligned with the current climate reality**.

We are committed to implementing the following principles in order to ensure environmental sustainability:

All Lamp products, processes will comply with the applicable legislation, both regional, national and European.


The production of waste shall be avoided and waste and waste products shall be recycled as far as possible.

The management of this policy will be periodically evaluated in order to constantly improve our performance.

4.8 Accessions

Lamp is committed to quality and respect for the environment as strategic factors related to the products and services offered, and is committed to defending Gender Equality policies.

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[#WorktitudeForLife](#) represents for **Lamp**, more than a commitment. It is one of the main strategic lines that make up the framework of actions from which Lamp tries to **promote a more sustainable lighting industry**, demonstrating its social and environmental commitment.

All these actions are included in the sustainability plan, structured around 3 development axes: **environmental, social and economic**. These three axes are materialized in concrete actions, such as:

- Implementation of gender equity policies.
- Actions to improve the use of energy resources and waste management focused on reducing the impact on the operational carbon footprint.
- Research, development and the use of more sustainable materials.
- Introduction of specific light technologies that try to mitigate light pollution.


To facilitate the implementation of gender equity policies, Lamp has developed an **Equality Plan** that helps guarantee the integral objectives of the entity and that its equality policy becomes one of its priority axes in order to guarantee, effectively, that both women and men have the same opportunities in access, participation and permanence in all management practices of the company.

With this Plan, it undertakes to establish equality between women and men in the daily operation and management of the company, through the equality objectives set and the strategies and practices to be adopted.

This Plan has been prepared by the Human Resources Department with the involvement of the Equality Commission. And with your approval, the Management of Lamp undertakes to meet the objectives of the same, as well as to make it public through the established channels and to train whenever necessary the professionals of the company.

The Equality Plan aims to:

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- Eliminate imbalances in the access and participation of women and men in the organization.
- Ensure that human resources management processes (selection, professional classification, promotion and training, remuneration) respect the principle of equal treatment and opportunities.
- Promote, in terms of equality between women and men, work, personal and family conciliation.
- Prevent sexual harassment and harassment based on sex.

In response to its commitment to Sustainability, Lamp adheres to **the United Nations Global Compact**, a journey that begins in February 2022.


Adhering to the Global Compact means that Lamp is committed to aligning its operations with Ten Universally Accepted Principles in the areas of human rights, labour standards, the environment and anti-corruption. It also promises to take action in support of the United Nations goals currently embodied in the Sustainable Development Goals (SDGs).

The United Nations Global Compact provides information, training and other tools to help companies meet the sustainability challenges they face. The main idea is that professionals have the knowledge and skills they need to achieve the SDGs and contribute in the best possible way to the United Nations 2030 Agenda.

As the organization itself points out, the first step in any business sustainability plan is to assume the right attitude and values. It is about companies fulfilling, at least, a number of fundamental responsibilities in environmental matters, but also in the field of human rights, labour and the fight against corruption.

To meet these core responsibilities, the Ten Principles of the United Nations Global Compact are proposed that companies can incorporate into their sustainability strategies and plans. With its compliance, the companies adhering to the Pact not only assume their responsibility to the

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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 by providing up-to-date information on the SDGs and how to achieve them, the Global Compact is also a platform for the promotion of good practices.

Lamp has different collaboration agreements with local non-profit social initiative entities that are benchmarks in the inclusion of people with functional diversity, in the care of the elderly and in cultural action in an economically sustainable way and committed to society and local Special Education centers.

As a sign of collaboration with these entities, Lamp opens its doors and receives visits to its facilities, with representatives of these institutions, establishes collaboration agreements for practices with people at risk of social exclusion, all responding to the commitment voluntarily assumed to operate responsibly and attending to morality.

4.9 Use and protection of assets


The Lamp Group makes available to its employees the necessary resources for the performance of their professional activity, and undertakes to provide the means for their protection and safeguarding.

All employees must use the company's resources responsibly, efficiently and appropriately in the environment of their professional activity. They must also protect and preserve them from any misuse that could result in damage to the interests of the company.

The company does not allow the use of the equipment it makes available to its employees to use computer programs or applications whose use is NOT legal, that may damage its image or reputation or to access, download or distribute illegal or offensive content.

4.10 Anticorruption

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The Lamp Group rejects any form of corruption, bribery or extortion and declares itself opposed to influencing the will of people outside the organization to obtain any benefit through the use of unethical practices, as well as that these are used with its employees. Nor will it accept that other persons or entities may use these practices with its employees.

Employees may not accept a gift in cash or cash equivalent of any amount (e.g. shares or any form of negotiable securities) and generally accept gifts whose value or nature exceeds courtesy attention, which are intended to improperly influence their business, professional or administrative relationships, both with public and private entities.

In any case, courtesy services may never consist of cash payments and must always be authorized by the appropriate senior management level.

Additionally, employees in the development of their professional functions will ensure compliance with the internal control established to avoid irregularities and undue advantages in the company's relationship with third parties.


4.11 Corporate image and reputation

The Lamp Group believes that one of the basic pillars that contribute to its corporate image and reputation is the creation of responsible relationships in those communities where it carries out its professional activity. Being the corporate image and reputation one of the most precious assets to preserve the trust of its shareholders, customers, employees, suppliers, authorities and society in general.

In reference to the image and corporate reputation, the employees of the Lamp Group must:

- Establish the utmost care in preserving the image and reputation of the company in all its professional actions.

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- Be especially careful in any public intervention, and must have the necessary authorization to intervene before the media, participate in professional conferences or seminars, and in any other event that may have public dissemination (including comments on social networks) provided that they appear as workers of the Lamp Group.
- The link or collaboration of employees to political parties will be carried out in a personal capacity and will be totally unrelated to the activities of the company.


4.12 Loyalty to the company

The Lamp Group fosters loyalty to the company by involving its employees in a relationship of participation in which company and worker cooperate and take responsibility for achieving common interests.

In the companies of the Group, it is necessary to work in an environment of cooperation and dedication, efficiently.

Accordingly, employees are committed to:


- Use the company's resources responsibly, preserving them from any inappropriate use, both of the company's physical assets and of the reliable and rigorous treatment of public information, as well as information that requires rigorous confidentiality.
- Keep the strictest confidentiality about all reserved information that they access as a result of the performance of their professional activity, so that it cannot be used inappropriately and refrain from using it improperly for their own benefit or that of third parties.
- Preserve the knowledge of the company, facilitating its dissemination to other employees of the Group, and making it available to the knowledge management systems that are enabled within the Lamp Group, so that it can be learned from experience.
- Do not concur with the activity of the company and contribute to the improvement of productivity. and providing maximum value in the processes in which it participates.

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- Comply with any obligations arising from their employment contract and applicable labor legislation.
- Act in a spirit of collaboration, making available to the other people who make up the company the knowledge and resources at their disposal that can help fulfill the Group's mission.
- Use professionally and rationally the resources and access to computer systems that the company makes available, and respecting the "Annex V" of the Quality Manual on the Personal Data Protection Policy and rules of the proper use of computer equipment, tools, devices and applications of Information Systems.
- Always act with integrity with customers. No advantages or benefits will be offered to some customers to the detriment of others.
- Seek the best satisfaction of customer expectations and develop an effort to anticipate in the knowledge of their needs.
- Maintain a direct relationship with customers, based on sincerity, honesty, loyalty and transparency.
- Provide a reliable service and have the resources and professionalism to solve any incident that may affect customers, committing to the values of good treatment, attention, respect, honesty and service.
- Take maximum care of the reputation of the company.
- Provide adequate, truthful and timely information and advice.

5. ACCEPTANCE AND COMPLIANCE WITH THE CODE

This Code of Ethics is mandatory for all employees, managers, directors and professionals of the Group as well as for future incorporations that will accept the content of this Code of Ethics and, in particular, the vision, values and rules of action established therein.

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6. ANNEX: Letter of Commitment Codeo of Ethics

LETTER OF COMMITMENT OF THE CODE OF ETHICS

I state that I have read the Code of Ethics (vs 3) of Lamp, and that I understand in all its terms the Standards of Conduct that govern our organization.

I understand that compliance is mandatory for all Lamp Group personnel and that by complying with the Code of Ethics, we all contribute to creating a better work environment in which we can grow as people and professionals.

I agree to comply with the standards of conduct described herein, including the disclosure of any actual or potential conflict of interest.

I undertake to consult Human Resources in case of doubts regarding the interpretation and application of the rules and policies included in this Code.

Place and date: _____

Company: _____

Full name: _____

Company: _____