

# CODE OF ETHICS FOR SUPPLIERS



## A MESSAGE TO OUR VALUED SUPPLIERS

Uruply S.A. - Lumin values its reputation for conducting business honestly and with integrity. We have prided ourselves on doing business the right way.

Uruply S.A. - Lumin views its suppliers as critical to its success. The company, therefore, strives to select suppliers who maintain a commitment to strong ethics standards. This code of ethics provides a foundation for Uruply S.A. - Lumin and its suppliers to build and maintain relationships based on fairness, trust, respect for the rights of individuals, compliance with the law, and sustainable business practices.

Note: Uruply S.A. - Lumin relies on many outside resources, including contractors, subcontractors, suppliers, vendors, consultants and others. For simplicity, all third-party providers of goods and services to Uruply S.A. - Lumin are referred to as "suppliers" in this code of ethics.

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Except as required by law, persons reporting concerns may request that they remain anonymous. Uruply S.A. - Lumin Ethics and Business Conduct makes every attempt to protect the confidentiality of information provided to it — unless maintaining confidentiality would create a significant health, safety or legal risk.



## PROMOTING AN ETHICAL CULTURE

Uruply S.A. - Lumin provides regular training to its employees in applying ethical principles to everyday decision making and manages a confidential system for raising concerns and responding to allegations of violations of its code of ethics.

We prefer to do business with suppliers who also have a strong commitment to promoting an ethical culture among their employees.



## LEGAL COMPLIANCE

Uruply S.A. - Lumin is committed to obey the law wherever it conducts business. We expect our suppliers to comply with all applicable laws, including laws relating to employment, human rights, the environment, and health and safety. Uruply S.A. - Lumin reserves the right to decline to deal with suppliers who do not comply with the law.



## EMPLOYMENT PRACTICES

Uruply S.A. - Lumin uses fair employment practices and strives to provide a safe and productive work environment for its employees. The company expects its suppliers to also maintain fair employment practices — specifically:

Fair working conditions: Adhere to relevant employment laws, including those related to maximum hours of daily labor, rates of pay, minimum age, privacy, and other fair working conditions. Prohibit the use of child labor, forced or bonded labor.

Freedom of union association: Respect the right of employees to freely organize and bargain collectively.



## SAFETY & HEALTH

Uruply S.A. - Lumin is committed to keeping safety paramount in everything we do and will do business only with suppliers who demonstrate a commitment to safety. We expect supplier to:

- Make continuous efforts to achieve a workplace that is free from work-related injury and illness.
- Conduct themselves in a manner consistent with all applicable safety standards, including governmental requirements, operations - and facility-specific safety



## GIFTS AND ENTERTAINMENT

Whenever a gift or entertainment is offered in the context of a business relationship, there is a risk that it may influence, or appear to influence, a business decision. In order to build and maintain the trust of our stakeholders, Uruply S.A. - Lumin discourages giving or accepting gifts or entertainment exceeding nominal value, including loans and guarantees, to or from any of the company's suppliers. This applies both to employees and to immediate family members.

Note: "Nominal value" denotes an item or event of relatively low value that is unlikely to be perceived as improperly influencing the recipient, such as a logo cap or lunch during business hours.



## RESOLVING ETHICS ISSUES

Employees of suppliers are encouraged to work through their own company to resolve internal ethics issues. However, suppliers should promptly report violations of this code or any unethical behavior by a Uruply S.A. - Lumin employee to a Uruply S.A. - Lumin manager or, if that is not feasible, to Uruply S.A. - Lumin Ethics and Business Conduct through one of the following means:

requirements, and contractual requirements.

- Identify and respond to any public health impacts of their operations and the use of their products and services.
- Treat injured employees with respect and provide medical treatment for workplace injury and illness.
- Maintain a workplace free of the effects of alcohol and drug use.
- Committed with security in the logistics chain, we adopt the necessary security measures in the fight against terrorism, smuggling, counterfeiting and any other illicit activity.



## SUSTAINABILITY

Uruply S.A. - Lumin strives to manage its businesses in a sustainable and responsible way. We seek to do business with suppliers who share our concerns for and commitment to sustainable business practices. At a minimum, suppliers must meet all applicable environmental rules, regulations and laws in the countries where they do business. In addition, Uruply S.A. - Lumin will seek business relationships with suppliers who go beyond legal compliance and consistently look for new and better ways to conserve resources, reduce pollution and waste, and enhance the communities in which they operate.



## CONFIDENTIALITY

Suppliers with access to confidential Uruply S.A. - Lumin information must not disclose such information to other parties without Uruply S.A. - Lumin's written consent. Such confidential information may include, but is not limited to, the following categories of information:

- Product pricing
- Costs
- Customers
- Employees
- Operating systems, policies and practices
- Designs
- Production technologies and know-how
- Engineering, technical and scientific



## PRIVACY

When suppliers handle personal confidential information in the performance of services on our behalf, we require them to ensure that such information is protected against unauthorized disclosure and is appropriately safeguarded.

Suppliers must immediately report actual or possible unauthorized disclosures of personal confidential information to Uruply S.A. - Lumin.

Note: "Personal confidential information" is private information about employees or other individuals (e.g., ID, Social Security numbers, home addresses and birth dates etc.).



## ILLEGAL PAYMENTS

Uruply S.A. - Lumin expects its suppliers to do business in an ethical and transparent manner. Suppliers must not offer bribes, kickbacks or improper payments of any kind to government officials or other third parties for the purpose of obtaining or retaining business or gaining an improper advantage. Suppliers are required to comply with the U.S. Foreign Corrupt Practices Act as well as local anti-bribery laws in each jurisdiction in which they do business.



## CRITERIA FOR SELECTING SUPPLIERS

The criteria for selecting suppliers will vary but will generally, focus on best value, which may include a variety of factors.

Before responding to any Uruply S.A. - Lumin, suppliers should become familiar with and ensure that they are able to comply with Uruply S.A. - Lumin's standard terms of purchase and will apply to all transactions unless the supplier and Uruply S.A. - Lumin have an express written and signed agreement to the contrary. Terms and conditions defining relationships with suppliers are communicated early in the supplier selection process, and agreements to such terms and conditions are reached before work begins.



## URUPLY S.A. - LUMIN'S COMMITMENT TO ITS SUPPLIERS

Uruply S.A. - Lumin's relationships with its suppliers must be characterized by honesty and fairness. We are guided by the following standards of behavior:

- We will not make payments to any employees of suppliers to attain lower prices for Uruply S.A. - Lumin.
- We will not reveal a supplier's pricing, technology or other confidential information without prior written permission.
- We will not make any type of recommendations as well as false or misleading comments to others, about suppliers, their products or services.