

ANNEX. THE THIRD PARTY'S CONFIRMATION TO THE CODE OF RESPONSIBLE BUSINESS CONDUCT

1. Purpose of the Code

Luminor takes responsibility for the impact inflicted on society and the environment as a result of our business activities, and we expect our Third Parties to do the same. The Code outlines Luminor principles on responsible business conduct. The Code follows guidance provided by international standard setters such as the OECD Guidelines, the UN Global Compact, the UN Guiding Principles on Business and Human Rights and ILO Tripartite Declaration of Principles concerning Multinational Enterprises on Social Policy.

2. Confirmations

2.1. The Third Party confirms:

- 2.1.1. to comply with all applicable laws and regulations in the countries where the Third Party operates;
- 2.1.2. to follow stricter requirements if there are differences between laws and regulations, the Code, or requirements contained in the contract concluded between Luminor and the Third Party;
- 2.1.3. to reflect the requirements set in the Code in contracts with the Third Party's own third parties;
- 2.1.4. to ensure fair treatment of employees;
- 2.1.5. to ensure forced labour is not used;
- 2.1.6. to respect the right of the Third Party's employees to establish, join or not to join trade unions and any other association of their choice;
- 2.1.7. to have an established employment processes which must be clearly communicated to all employees;
- 2.1.8. not to use child labor and adhere to respective local regulations;
- 2.1.9. to ensure that working conditions, hours and voluntary overtime are in accordance with local regulation and industry practice, and that wages and benefits meet legally mandated minimums without unauthorized deductions;
- 2.1.10. to provide a safe and healthy work place for all employees;
- 2.1.11. to have a documented and implemented health and safety management system appropriate to the size, nature and risks of the Third Party's operations;
- 2.1.12. to have a written environmental policy, if required by applicable regulations, that is appropriate to the size, nature and risks of the Third Party's operations;
- 2.1.13. to implement an effective system to identify and minimize potential hazards to the environment, if the Third Party's activities involve an environmental risk;
- 2.1.14. to have a documented and implemented environmental management system appropriate to the size, nature and risks of the Third Party's operations and that works towards continuous improvement in managing these risks, if required by applicable regulations;
- 2.1.15. to act in an ethical, fair and professional manner in all contact with Luminor;
- 2.1.16. to comply with applicable laws and regulations concerning bribery, corruption, fraud and any other prohibited business practices;
- 2.1.17. to be firmly opposed to all forms of money laundering, and to take steps to prevent financial transactions being used by others to launder money;
- 2.1.18. not to at any time operate in breach of general or special competition regulations, such as illegal cooperation on pricing, illegal market sharing or other behavior that is in breach of competition laws where the Third Party operates;
- 2.1.19. to report about any serious suspected or actual breach of agreed responsible business principles to fraud@luminorgroup.com;

2.1.20. to be prepared for any external disruptions to the Third Party's business, for example caused by natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases, fires or other major accidents;

2.1.21. to designate an individual in a senior management position with responsibility for ensuring compliance with the Code;

2.1.22. to maintain appropriate records to demonstrate compliance with the requirements and provide them upon Luminor's request

2.1.23. internal audit and compliance function of Luminor will have unrestricted right of auditing of the compliance with the Code.

2.1.24. To ensure conflict of interest* awareness principles in cooperation with Luminor, meaning potential conflict of financial and/or personal interest relationships between Third Party' and Luminor' employees from Third Party' and Luminor cooperation perspectives; and to be ready: to inform Luminor (fraud@luminorgroup.com) if conflict of interest is identified; to present Conflict of Interest, stating the general nature and sources of Conflicts of Interest, as well as the resultant risks for the relevant party; and to cooperate with Luminor to agree on actions to be taken to mitigate the risks.

* - A conflict of interest is a situation in which a person or organization is involved in multiple interests, financial or otherwise, and serving one interest could involve working against another. Typically, this relates to situations in which the personal interest of an individual or organization might adversely affect a duty owed to make decisions for the benefit of a third party.