



PURCHASING POLICY

Rev.	Description	Approval Status
00	First Emission	Approved by the President 09/07/2023
01	General Revision	Approved by the President 10/22/2025
02	Revision	Approved by the Board of Directors 07/09/2026

REREFERENCE STANDARDS AND REGULATIONS

In defining its Purchasing Policy, Lumson S.p.A. (hereinafter also "Lumson") was inspired by the principles outlined in the main internationally recognized frameworks, including, but not limited to:

- The United Nations 2030 Agenda and the Sustainable Development Goals (SDGs);
- The Ten Principles of the United Nations Global Compact;
- The United Nations Guiding Principles on Business and Human Rights;
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
- The Conventions of the International Labour Organization (ILO);
- The United Nations Convention against Corruption (UNCAC);
- The Corporate Sustainability Reporting Directive (CSRD);
- The United Nations Women's Empowerment Principles (WEPs);
- The ISO 45001 standard for a certified occupational health and safety management system;
- The ISO 14001 standard for a certified environmental management system;
- The ISO 9001 standard for a certified quality management system;
- The ISO 37001 standard for a certified anti-bribery management system;
- The ISO 27001 standard for a certified Information security management system;
- The ISO 50001 standard for a certified energy management system.

PURPOSE AND SCOPE OF APPLICATION

The primary objective of the Lumson's Purchasing Policy is to strengthen the development of proficient and lasting relationships with suppliers: the same are required to embrace the principles and rules suitable for pursuing together the common goal of creating a long-term partnership characterized by transparency and collaboration. Lumson considers of high importance the social and environmental impacts of its activities and firmly commits in responsible purchasing practices.

The development and growth of the above begin from the Supplier selection phase, which must take place according to a documented procedure that guarantees impartiality and equal opportunities to all parties involved.

The selection of suppliers and the determination of purchasing conditions must be based on an objective assessment of quality, environment, social, ethical, governance, price and the ability to provide and guarantee services of an adequate level as well as offering alternative and innovative solutions.

For new strategic suppliers, the approval process also includes an on-site inspection by the Lumson purchasing and the quality assurance teams or by an appropriate certification body. Lumson uses a performance evaluation system that is shared with the Suppliers on an annual basis, which include ESG practices.

The Supplier, considered a specialist in its specific product category, is involved from the start of the project in order to immediately share the technical and economic objectives.

We believe that close collaboration with our supply chain is essential to achieve high levels of quality in our products, services and production activities, so we are deeply convinced that Suppliers are and must be strategic allies.

Lumson actively promotes social responsibility and purchasing based on the principles of sustainability with particular attention to the social and environmental issues that characterize its strategic vision.

Lumson promotes the protection of workers' rights and is committed to treating all categories, without discrimination, with dignity, respect and freedom of associations. Lumson's commitment is focused on maintaining and demanding a working environment free from forced labour (or

slavery), from illegal child labour and from the illegal trafficking of people for slavery or sexual exploitation throughout the supply chain.

In addition, according to the Reporting Standards of the Global Reporting Initiative (GRI: standards chosen by Lumson for its Sustainability Report), Lumson assesses the significance of its impacts by engaging in a dialogue with the main stakeholders, including its suppliers, considered by the organization to be an essential part of the Supply Chain. They are engaged through a dedicated ESG survey that is promptly analyzed and considered a fundamental part of the sustainable development of Lumson.

The "General Terms and Conditions of Purchase" accessible from our website, together with the contractual models deriving from them, form the basis for supply relationships with our partners.

Lumson promotes a corporate governance system that is based on compliance with the law and the prevention of corruption, inspired by the highest standards of integrity, honesty and fairness. Suppliers are also expected not to tolerate or engage in any type of corruption, extortion or embezzlement in a context of full compliance with the rules of business and the ethical-reputational aspects of the associated activities.

POLICY COMMUNICATION and MONITORING

Lumson's Purchasing Policy is shared with all its stakeholders and is publicly available on the company's website.

In order to guarantee the defined standards, Suppliers are required to adhere to the principles outlined in Lumson's Code of Ethics and Anti Bribery and Anti corruption policy, publicly available on the company's website.

Lumson is moreover committed to training its employees and encourages all collaborators to disseminate the Policies' contents, promoting awareness and proper adherence throughout the organization.

As part of its commitment to continuous improvement, Lumson pledges to implement robust monitoring systems and conduct regular audits and due diligence processes to prevent, identify, and address any non-compliance with its policies.

To facilitate the reporting of potential violations without fear of retaliation and to promote shared responsibility, Lumson provides a secure and confidential reporting mechanism for both internal and external stakeholders, available on the company website. In the event of non-compliance, Lumson is committed to promptly and effectively implementing the necessary corrective actions.

UPDATES AND REVIEW

The Purchasing Policy is subject to periodic reviews and updates to ensure its adequacy and effective implementation in line with the evolution of international standards and regulatory requirements. All updates shall be submitted for approval by the Board of Directors to ensure alignment of the Policy with the core principles and strategic vision of Lumson.