

CODE OF ETHICS POLICY

Lumotech employees are committed to organisational integrity and sound business ethics.

Honesty

Honesty is the human quality of communicating and acting truthfully related to truth as a value. This includes listening and any action in the human repertoire— as well as speaking. Superficially, honesty means simply stating facts and views as best one truly believes them to be. It includes both honesty to others, and to oneself and about one's own motives and inner reality. Honesty can also mean fairness, and truthfulness, and the avoidance of misleading people. Honesty is being sincere, truthful, trustworthy, honourable, fair, genuine and loyal with integrity.

We will behave in an open and honest way, when dealing with each other but also when dealing with external stakeholders. Honesty is the cornerstone of our business environment, resulting in higher levels of trust. All business communications will be accurate, truthful and based on trust and respect.

Fairness

Fairness means free from favour toward either or any side, hence it implies an elimination of one's own feelings, prejudices, and desires so as to achieve a proper balance of conflicting interests.

Respect

Respect is about how people are treated. All employees are required to show consideration for other people in the execution of all duties, including the provision of services and advice and in decision making. We will respect the human dignity of others as well as their rights – in particular those rights granted by the South African Constitution. We will have respect for the needs and interests of the communities within which we operate, and commit ourselves to making a positive impact through our business activities. We will respect the assets and resources of Lumotech, and utilise them in a responsible manner.

Accountability & Responsibility

Accountability is about fulfilling one's responsibility as a Lumotech employee towards colleagues, stakeholders, and the broader local, national and international community. Employees are expected to understand their role within Lumotech and to take personal and professional responsibility for their actions. Lumotech employees are also expected to access sufficient information, and ensure that they have the understanding, competence, knowledge, and resources to discharge their duties in a responsible manner. Employees must not engage in activities that may potentially bring Lumotech into disrepute. Accountability refers to being answerable and culpable for an outcome, and responsibility means being able to answer for one's conduct and performance.

We will – at all times – comply with both the letter and the spirit of the laws of the Country and internal policies and procedures of the company. We will be accountable and responsible for our own actions. This will increase our sense of ownership and empowerment within Lumotech. We will avoid conflicts between the interests of Lumotech and our individual interests. Examples of such behaviour are holding a second job (moonlighting) without permission, establishing close relationships with suppliers or customers.

I, the undersigned, am totally committed to this policy and will ensure that it is effectively promoted and communicated to all Lumotech personnel.

A handwritten signature in black ink, appearing to read 'Jaco du Plessis', is written over a horizontal line.

Jaco du Plessis

Managing Director

A handwritten date '02/04/2024' in black ink is written over a horizontal line.

Date