



Luware Supplier Code of Conduct

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Introduction

The Luware Group (Luware) is committed to ethical business practices. We conduct our business activities with honesty and integrity, in compliance with applicable laws and regulations, and take measures to minimize the impact of our activities on the environment.

This Supplier Code of Conduct defines the minimum standards of business conduct and business practices that Luware expects its business partners including Suppliers to comply with. We are committed to working with our Suppliers to ensure high social, environmental, and business ethical standards.

1 Ethics and Compliance

Luware is committed to conducting its business in a fair, honest, and open manner. We act in accordance with applicable laws and with the highest standards of integrity. Likewise, we expect our Suppliers to conduct their business ethically, act with integrity and respect applicable laws. This includes avoiding all forms of illegal activity, such as bribery, corruption and fraud, or obtaining improper benefits or preferential treatment from their business relationships.

1.1 Anti-Bribery and Corruption

We require our Suppliers to be familiar and comply with the relevant anti-corruption laws and regulations as well as the applicable anti-bribery laws and regulations. Suppliers shall never directly or through intermediaries, offer, promise, give or accept a bribe or seek to extort a bribe, or a personal or improper advantage (of money or anything of value) in order to obtain or retain a business or other advantage or to influence the decisions or actions of a third party, whether public or private. Nor shall the Supplier accept any such advantage in return for preferential treatment of a third party.

1.2 Fraud

We do not tolerate any form of corrupt practices including extortion and fraud. Suppliers must not engage in, facilitate, or tolerate any acts of fraud, including misrepresentation, falsification of records, theft, deception, or any act intended to mislead for unlawful or unfair gain. Suppliers are expected to maintain a high standard of integrity and transparency in all business dealings and to implement effective controls and procedures to prevent, detect, and address fraud within their operations.

Suppliers must remain vigilant and proactive in identifying and mitigating the risk of fraud, and must take immediate action to investigate and remediate any suspected fraudulent behaviour. Any actual or suspected instances of fraud that could impact the business relationship must be promptly reported.

1.3 Anti-Money Laundering

We expect our Suppliers to conduct business with integrity and in full compliance with all applicable anti-money laundering laws and regulations and international standards. Suppliers shall not engage in any form of money laundering activities, or any other activities which may facilitate, result in or be perceived to be money laundering. Suppliers shall perform appropriate due diligence on customers, subcontractors and business partners and monitor for unusual or suspicious financial transactions or behaviours that may indicate potential money laundering or related illicit activity. Suppliers are responsible for ensuring that their employees, agents and representatives are adequately trained and aware of their obligations under applicable anti-money laundering laws and regulations.

1.4 Sanctions

Suppliers must conduct business activities in strict compliance with all applicable trade, export control, and sanctions laws and regulations, including but not limited to those imposed by the United Nations, the European Union, the United States Department of the Treasury's Office of Foreign Assets Control ("OFAC") and the United Kingdom.

Suppliers shall not engage in any transaction – directly or indirectly – with individuals, entities, organizations, or countries that are subject to trade or economic sanctions. This includes refraining from using third parties, intermediaries, or other indirect means to circumvent sanctions or to facilitate transactions that would otherwise be prohibited under applicable laws.

Suppliers are expected to implement appropriate due diligence, screening, and internal control processes to ensure ongoing compliance with all relevant sanctions laws and regulations and to promptly identify and prevent any potential violations.

1.5 Conflict of Interest

Suppliers shall refrain from any actual, potential or perceived conflicts of interest in their work with us. This includes situations where personal, financial, or other relationships could improperly influence – or appear to influence – their business decisions or interactions with us.

Suppliers shall notify us immediately of any known family ties or other close personal relationships with our employees who have an influence over their engagements with us.

1.6 Fair Competition

Suppliers shall conduct business in full compliance with all applicable competition and anti-trust laws and regulations. They must compete fairly and ethically in the marketplace and avoid any conduct that could restrict free and fair competition.

Suppliers shall not:

- Fix prices, coordinate bids, allocate markets, limit production, or manipulate offers in any way
- Exchange competitively sensitive information—such as current, past, or future pricing, costs, terms, or market strategies—with competitors
- Participate in cartels or any form of anti-competitive agreement, whether formal or informal
- Abuse a dominant market position to unfairly limit competition, exploit customers, or exclude competitors

1.7 Intellectual Property Rights

We expect our Suppliers to respect intellectual property rights, including trademarks, copyrights, patents, trade secrets, and other proprietary information. Suppliers shall comply with all the applicable laws governing intellectual property rights and conduct technology and know-how transfers in a manner protecting intellectual property rights.

1.8 Data Privacy and Confidentiality

We are transparent in the handling of personal data and, in particular, the data of our stakeholders. We are committed to safeguarding personal data by ensuring its privacy and security are protected at all times. Limiting access to and responsible use of personal data is essential to protecting privacy and maintaining data security. We expect our Suppliers to uphold the same commitment. Suppliers must protect personal data of everyone with whom they do business, including customers, employees and business partners in accordance with relevant data privacy laws and regulations.

Any non-public information about Luware as well as information about our stakeholders is considered confidential information. It includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, product recipes, designs, databases, records, salary information and any non-published financial or other data. In particular, we do not allow access to confidential information and commercial secrets to unauthorised internal or external persons. We do not misuse such information for personal gain or for unauthorised third-party advantage. We expect our Suppliers to treat confidential information with the same care as we do. This obligation continues beyond the termination of business relationship.

2 Human Rights and Labour Rights

2.1 Human Trafficking and Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Luware does not tolerate any form of modern slavery or human trafficking within its business operations. Suppliers shall ensure that they and their supply chain is free from modern slavery and human trafficking.

2.2 Prison, Forced Labour and Child Labour

Forced or bonded, indentured or involuntary prison labour is not to be used. Suppliers will ensure that employees are not required to lodge deposits of money, identity papers or similar to retain or obtain employment and that the relationship between the employee and the Supplier is freely chosen and free of threats.

Suppliers shall not engage in or benefit from the use of child labour. The term “child” refers to any person employed under a country's legal age for employment or the age established for completing compulsory education. Child labour refers to work that is mentally, physically, socially, morally dangerous or harmful for children, or improperly interferes with their schooling needs.

2.3 Non-Discrimination

Key components of success are a diverse, productive work environment that is free from discrimination and harassment. As part of our commitment to having a respectful and inclusive work environment, Luware prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual - on the basis of race, colour, religion, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. Employment at Luware is based solely upon individual merit and qualifications directly related to professional competence. We expect such a working environment from our Suppliers.

2.4 Wages, Benefits and Working Hours

Suppliers shall pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall consider remuneration in accordance with the skills, performance and experience of their workers based on local competitive conditions, as well as offer benefits in accordance with local market practices. Suppliers shall comply with applicable national laws on working hours and public holidays.

2.5 Freedom of Association and the Right to Collective Bargaining

Suppliers shall respect the right of employees, as set forth in local laws, to join (or refrain from joining) an employees' organisations of their choice, without interference or negative consequences. Suppliers shall respect the rights of employees to collective bargaining, and shall adhere to collective bargaining agreements, where these exist. Suppliers shall, subject to applicable law, engage in collective bargaining in good faith. Employees representatives are not discriminated against and have access to exercise their representative functions in the workplace.

3 Health and Safety

Suppliers shall provide and maintain a safe, healthy, and hygienic work environment for all employees throughout their entire supply chain in compliance with all applicable laws, regulations and internationally recognized standards.

Suppliers must take proactive measures to prevent workplace accidents, injuries, and illnesses by identifying and mitigating health and safety risks through appropriate training, policies, procedures, and protective equipment. Emergency preparedness and response plans must be in place, regularly tested, and clearly communicated to all employees.

Suppliers are also expected to continuously assess and improve occupational health and safety performance.

4 Environmental Responsibility

We expect all Suppliers to operate in an environmentally responsible and sustainable manner, fully complying with all applicable laws and regulations, and standards in the countries where products are manufactured or services are delivered. Suppliers are expected to actively minimise their environmental footprint through the efficient use of resources, reduction of emissions, and prevention of pollution.

Suppliers shall establish and maintain effective environmental management systems to identify, monitor, and manage environmental risks. These systems should include appropriate processes for the safe and responsible handling, transportation, storage, recycling, reuse, or disposal of all types of waste, including hazardous materials. Suppliers are encouraged to implement continuous improvement practices to reduce environmental impact across their operations and supply chain.

Suppliers shall take proactive steps to:

- Improve energy and water efficiency across operations
- Reduce greenhouse gas emissions and transition to renewable energy sources
- Prevent pollution of air, water, and soil
- Safeguard ecosystems and protect human health
- Promote circular economy principles, including material reuse and sustainable product design
- Engage employees and stakeholders in environmental awareness and training initiatives

We believe that environmental stewardship is a shared responsibility. By working together with our Suppliers, we aim to drive positive environmental outcomes and contribute to a more sustainable future.

5 Reporting Concerns

Luware is committed to creating an open and trustworthy environment where everyone is encouraged to report breaches or suspected breaches of the Supplier Code of Conduct. Should an employee of a Supplier believe they have been bullied, harassed, or discriminated against by an employee or by a stakeholder of Luware we strongly encourage them to immediately report the incident to Luware's Trusted Function via compliance@luware.com with the subject "Trusted Function – Concern". Contact with the Trusted Function can be made anonymously if desired.

The report should, where possible, contain a description of the concern, the event, the breach and/or the suspected breach, the date of occurrence and/or timeframe of occurrence, the involved parties, and any other information such as communications etc. that may be helpful in order to address the case.

Notwithstanding the foregoing, Luware's Suppliers are obliged to immediately report any breaches or suspected breaches of confidentiality or intellectual property rights to the Trusted Function.

All reported breaches or suspected breaches will promptly and thoroughly be investigated, and appropriate action will be taken.



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