

## Supplier Code of Conduct

### INTRODUCTION

For Lumbar OÜ, responsible business practices include a commitment to human rights, respect for employees and partners, and environmental sustainability. We expect our suppliers to share these values, adhere to these principles in their operations, and comply with all applicable laws and regulations.

This Code of Conduct is an integral part of all agreements between the Buyer and its suppliers. The term “supplier” refers to any individual or legal entity providing raw materials or services to the Buyer. Additionally, the term encompasses the suppliers’ subcontractors.

### HUMAN AND LABOR RIGHTS

Suppliers must respect human rights and must not participate in any human rights abuses within their sphere of influence. Suppliers are prohibited from employing workers under the age of 15 or below the minimum age specified in national legislation, whichever is higher. Suppliers employing individuals between the minimum working age and 18 years must ensure that the work does not interfere with their education, health, safety, or moral development. Suppliers must not engage in any form of forced or compulsory labor and must not discriminate against any employee. Suppliers must treat all employees fairly and with respect. Suppliers are required to comply with all occupational health and safety regulations. They must raise awareness among employees about health and safety requirements, foster a culture of safety through open communication, and ensure that employees receive appropriate workplace training. All health and safety incidents must be documented and investigated by the supplier.

### BUSINESS ETHICS

Suppliers’ business activities must comply with all applicable anti-corruption laws. This includes refraining from offering or accepting bribes, facilitation payments, or anything of value intended to secure or maintain business relationships or gain improper advantages. Suppliers must also comply with all rules and regulations pertaining to the safety and quality of products and services.

### COMPLIANCE REQUIREMENTS

Suppliers are obligated to inform the Buyer promptly of any significant changes in their supply chain and any violations of environmental, business ethics, or human and labor rights standards. If a supplier intentionally or repeatedly violates this Code of Conduct, refuses to share necessary information with the Buyer, provides false information, or fails to take corrective actions to address violations, the Buyer reserves the right to unilaterally terminate its relationship with the supplier.

## ENVIRONMENT

The Buyer's focus on environmentally sustainable operations emphasizes two aspects: the origin of wood materials and the CO2 footprint of the supply chain. The Buyer aims to contribute to sustainable forestry through the purchase and sale of certified and controlled wood materials, avoiding the use of wood from illegal or questionable sources in its production processes. The Buyer and the Client make every effort to avoid trading in wood from the following sources:

- Illegally harvested wood.
- Wood harvested in violation of civil and traditional rights.
- Wood from forests where high conservation values are threatened by management activities.
- Wood from forests that have been converted to non-forest use.
- Wood from genetically modified tree species.
- Wood harvested in violation of ILO Fundamental Conventions as defined in the [ILO Declaration on Fundamental Principles and Rights at Work \(1998\)](#).

Suppliers must ensure that the wood materials they supply to the Buyer comply with the legislation of the Republic of Estonia and meet the requirements of the EU Deforestation Regulation (EUDR)<sup>1</sup>, FSC standards<sup>2</sup>, and SBP standards<sup>3</sup>.

Suppliers are required to collect, analyze, and share with the Buyer all relevant supply chain information necessary for assessing and verifying the origin, species, CO2 footprint, and other environmental impacts of the raw materials. The Buyer expects suppliers to make continuous efforts to reduce the environmental impact of their operations and confirms that, under similar economic conditions, preference will be given to suppliers providing certified materials and those with lower environmental impacts in their supply chain.

Supplier: \_\_\_\_\_

Lumbar OÜ

Date:

Date:

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<sup>1</sup> [Regulation \(EU\) No 2023/1115 of the European Parliament and of the Council of 31 May 2023, concerning the making available on the Union market and export from the Union of certain products associated with deforestation and forest degradation, and repealing Regulation \(EU\) No 995/2010.](#)

<sup>2</sup> FSC-STD-40-005 - <https://fsc.org/en/document-centre/documents/resource/373>

<sup>3</sup> SBP Standard 1: Wood Material Compliance - <https://sbp-cert.org/documents/documents-register/>