

## CODE OF CONDUCT

May 2023

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**Introduction** This Code of Conduct outlines Lumineye Pty Ltd's expectations for all employees, contractors, suppliers and business partners regarding ethical behaviour, integrity and compliance with the laws and regulations applicable to our operations in Queensland, Australia. By adhering to this code, we strive to create a culture of trust, transparency and ethical decision-making within our organisation.

**Compliance with Laws and Regulations** Lumineye Pty Ltd is committed to upholding and complying with local laws and regulations within Australia. Employees are expected to familiarise themselves with the laws relevant to their roles and responsibilities and to conduct their activities in strict adherence to these laws. This includes but is not limited to bribery, corruption, fraud, antitrust laws and trade restrictions.

**Bribery and Corruption** Lumineye Pty Ltd strictly prohibits any form of bribery, corruption or improper payments in any business activities. Employees are prohibited from offering, giving, soliciting or receiving bribes, kickbacks or any other form of unethical advantage. This prohibition extends to interactions with government officials, customers, suppliers and any other party we engage with.

**Conflicts of Interest** Employees of Lumineye Pty Ltd must avoid situations that may create or appear to create a conflict of interest. A conflict of interest occurs when an individual's personal interests interfere with their ability to make objective and fair decisions in the best interest of the company. Employees must promptly disclose any potential conflicts of interest to their supervisor or senior management. All Lumineye employees have access to an anonymous safe box where they can report any suspicions of misconduct, without the fear of reprisal, victimisation or discrimination.

**Fair Competition** Lumineye Pty Ltd is committed to fair and open competition in the marketplace. Employees must avoid engaging in anti-competitive practices such as price-fixing, bid-rigging, market allocation or any other actions that may restrict competition or harm consumers. We compete based on the merits and quality of our products and services, adhering to applicable local and national laws and regulations.

**Protection of Company Assets** Employees are responsible for protecting and efficiently utilising Lumineye Pty Ltd's assets, including physical resources, intellectual property, confidential information and technological resources. Company assets should be used solely for legitimate business purposes and must not be misused, stolen or transferred without proper authorisation.

**Confidentiality and Privacy** Employees must maintain the confidentiality of sensitive business information, trade secrets, customer data and any other proprietary or confidential information entrusted to them. Personal privacy rights must be respected and personal information should only be collected, used and disclosed in accordance with applicable privacy laws and Lumineye Pty Ltd's privacy policy.

**Health, Safety & Environment** Lumineye Pty Ltd is committed to providing a safe and healthy work environment for all employees. Employees must comply with health and safety regulations, take necessary precautions and report any potential hazards or accidents promptly as per Lumineye procedures. We strive to minimise our environmental impact, promote sustainable practices and comply with environmental laws and regulations.

**Respectful Workplace** Lumineye Pty Ltd values diversity, equality and mutual respect among its employees. Harassment, discrimination or any form of disrespectful or inappropriate behavior based on race, gender, religion, nationality, age, disability or any other characteristic is strictly prohibited. We promote an inclusive and supportive work environment that values and respects individual differences.

**Reporting Violations** Lumineye Pty Ltd encourages employees to report any suspected violations of this Code of Conduct promptly and without fear of retaliation. Reports can be made to supervisors, senior management or through confidential reporting channels, such as Lumineye's anonymous safe box. All reports will be treated confidentially and appropriate investigations will be conducted.

**Consequences of Non-Compliance** Violations of this Code of Conduct may result in disciplinary action, up to and including termination of employment or termination of business relationships. Lumineye Pty Ltd reserves the right to take appropriate action based on the severity and circumstances of the violation.

**Code of Conduct Review** This Code of Conduct will be periodically reviewed to ensure its relevance, effectiveness and alignment with changing laws, regulations and industry standards. Lumineye Pty Ltd is committed to fostering a culture of ethical behaviour and continuous improvement in all aspects of our operations.

**Victor Arutjunow**

**CEO**