

Social Responsibility

POLICY
B-SAL/POL01-v1.1

Classification: Public

1. Summary

Lumera provides products that support the business and IT-needs of our customers' operational flows and processes.

Lumera is committed to social responsibility in the same way that we are to environmental sustainability.

The reason we do this is to be responsible for sustainable development towards our society and environment, but also towards our customers and our staff.

We like to think that corporations as well as individuals can act for a better society.

Our social responsibility goals are in harmony with our financial and business goals, as well as our goals relating to environmental sustainability and maintaining a healthy work environment.

Our staff is very involved in this work and, when relevant, so are our customers and stake holders.

We strive to exceed our own expectations and requirements and those of customers, stakeholders and society.

Lumera's overall ambition with respect to social responsibility is to:

- Maintain a transparent and ethical leadership model
- Keep an open and transparent relationship with our customers and coworkers, based on cooperation and mutual respect.
- Assure that the development line of products and services is affected by social responsibility in the same way as our business operations.
- Act for a better environment, in areas where we leave a footprint.

2. Lumera's Management System for Social Responsibility (MSS)

Lumera has summarized the work related to social responsibility in a dedicated Management System for Social Responsibility (MSS). MSS is based on the ISO 26000 standard even though there is no certification process for this.

MSS is an integral part of Lumera's Management System that is based on our *Policy for Social Responsibility* and our *Goals for Social Responsibility*.

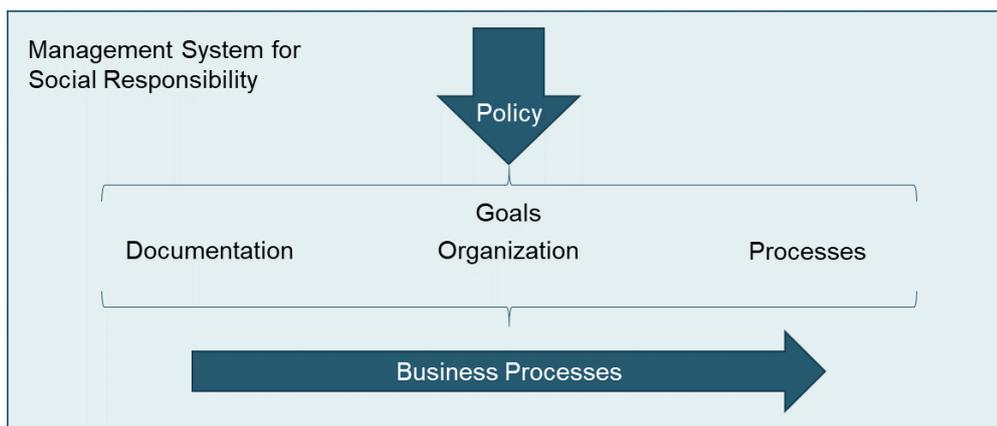


Figure 1. Lumera's management system for Social Responsibility

Our intention with MSS is for social responsibility and sustainable development to pervade the entire business. This means that our business shall:

- Be operated to be socially responsible and act for sustainable development.
- Be operated with wide margin in legislative compliance.
- Constantly improve our efforts towards being socially responsible and act for sustainable development.

The directive and preferred direction to our MSS is stated by our management and is based on the company's chosen strategy and goals.

Lumera conducts a yearly review of our 3-5 year strategic goals. These are broken down into a tactical plan with goals for the company as well as each profit center.

A part of the strategy and business plan covers Lumera's view on employees and includes social responsibility. Our work with social responsibility is, at all times, an integral part of our strategic planning and daily operations.

The MSS is composed by:

- a governing organization
- processes for establishing and refining rules and regulations
- Lumera's business processes
- instructions for how to follow Lumera's business processes

An internal review is done annually with a semi-annual check-up.

The review is an on-going effort with the purpose of continuously improving Lumera's work with respect to social responsibility. An annual review of the entire MSS is done, resulting in action plans to make changes to our documentation and routines, and to incorporate these changes in the rules and regulations for our daily operations.

The described work is done systematically to continuously improve the prerequisites for sustainable development.

3. Verification

This policy for social responsibility was verified on March 24th, 2021 by the CEO of the company.

4. Policy for Social Responsibility

Our policy for social responsibility is an expression of Lumera's management's commitment to a socially responsible work place.

The mind-set is that Lumera's work with social responsibility will constantly improve and increase our contribution to sustainable development.

Our social responsibility covers management of social, financial, ethical and environmental aspects.

4.1 Covered parties

Our policy for social responsibility covers our entire operations, our employees and consultants.

As far as possible, Lumera aims to expand our work with social responsibility to our customers and suppliers.

4.2 Responsibility

The CEO of Lumera is responsible for our work with social responsibility and its management system.

The operational work with social responsibility is carried out by the function Facilities and Management systems.

Each manager is responsible for the social responsibility for their own operations.

Lumera has established a council for social responsibility.

Lumera's *coworkers* have a *particularly* important part in working with social responsibility.

All of our employees carry a joint responsibility for being familiar with, and following Lumera's policy, rules and regulations as well as instructions and directives.

4.3 Review and self-control

A review of the entire MSS, which is based on certain measurements and prerequisites, is done yearly, in collaboration with the Council of Social Responsibility.

4.4 Commitments

Lumera has taken a stance on social responsibility and therefore makes certain commitments:

- We will follow current legislation and any other rules and we will strive to exceed any legal requirements, constitutions and other provisions
- We will work systematically and in a proactive way.
- We will regularly assess our work and results.
- We will continuously strive to increase our contribution to sustainable development.
- We will continuously inform our stakeholders about our work with and progress towards social responsibility.

4.5 Possibilities

We hope that our work with social responsibility will be an influencer for sustainable development in our society, and we would like to involve our customers and suppliers. We make demands to our suppliers, communicate our efforts, and invite our staff to involve our customers.

In addition, we want to set tangible goals which contribute to responsible development for our company and its operations.

4.6 Principles of social responsibility

All principles for social responsibility are a given at Lumera.

Lumera believes that we cannot have responsibility, transparency, or a code of ethics without having them all. They are all pre-requisites for the other, as they are a consequence of each other.

Lumera depends on its employees and customers, and pays a great deal of respect to their opinions.

Respect for human rights and the rule of law are self-evident for us. Similarly, respect for International Code of Conduct is important and will be increasingly important as we expand internationally.

4.7 Areas of responsibility

We use the ISO 26000 standard as basis for our work with social responsibility. The standard describes seven different areas of responsibility, which together make up the body of what social responsibility embraces. All areas are important, but we have chosen to focus specifically on a few of them after consultation with our stakeholders.

Lumera has the benefit to operate in Sweden and the Nordics where many of the basic principles for social responsibility are a given. For instance, it goes without saying that Lumera will respect both the rule of law and human rights and make decisions based on a code of ethics. This gives us two consequences in our work with Social responsibility.

- We can choose to focus only on a few areas of the standard. All areas are important, but as some areas are fulfilled and self-evident for us, we haven't given them high priority in our work.

- We would like to see more perspective on the terms responsibility and sustainability, included in the products and services we offer, and of course in our employees. Lumera operates in a branch of industry driven by a long-term perspective, which is why we need to have a perspective of sustainability in everything we do.

We have chosen to focus on the following areas of responsibility:

- Good methods of operations – because our customers expect this and the nature of the insurance branch of industry requires it.
- Operations management- because the way we operate and manage the company is the foundation of everything we do.
- Consumer inquires – because knowledge of long-term savings benefit young people and futures retirees.
- Environment – because everybody should help to protect the environment.
- Labor standards – because our employees ARE the company.