

CODE OF ETHICS AND CONDUCT

SPECTRA LIGHTING



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Dear Team,

We are excited to present the Spectra Lighting Code of Ethics, a vital document that sets the ethical foundation for our company. This Code encapsulates the fundamental principles, values, and conduct that we uphold in our interactions, both within our organization and with our external partners. It spans across all aspects of our operations, including economic, social, cultural, and environmental spheres.

At Spectra Lighting, we are dedicated to growth that is both responsible and sustainable. Our Code of Ethics is built upon internationally recognized standards on human and labor rights, particularly the Universal Declaration of Human Rights. This commitment to ethical integrity is a priority for our leadership and is essential in maintaining our reputation and trust within the industry and community.

Ethical behavior is not just a guideline but a core expectation for every member of our team. It is our collective responsibility to embody these principles in our daily activities. By doing so, we not only enhance our work environment but also achieve better business results. Our Management Board encourages open dialogue and is ready to address any challenges that arise. Additionally, our Ethics Officer is available to assist any employee in understanding and adhering to the standards set forth in this Code.

From the very beginning, Spectra Lighting has been managed with a strong ethical compass, fostering relationships rooted in respect and trust. This Code of Ethics will help us further this ethos and ensure we maintain the highest standards of business ethics. Our success in this endeavor relies on the commitment and cooperation of every team member.

Thank you for your continuous hard work and dedication to our common goals. Your efforts are a key factor in Spectra Lighting's ongoing success and in strengthening our leadership position in the lighting industry.

Sincerely,

Management Board



PURPOSE AND SCOPE OF APPLICATION OF THE CODE OF ETHICS

The purpose of the Spectra Lighting Code of Ethics is to establish a clear and comprehensive framework of ethical standards that guide our actions and decisions. This Code is designed to promote integrity, transparency, and accountability within our organization and in our interactions with external stakeholders.

SCOPE OF APPLICATION THE CODE OF ETHICS APPLIES TO:

- All employees, regardless of position or role within the company.
- All stakeholders, including suppliers, contractors, and business partners.
- All business activities, encompassing economic, social, cultural, and environmental dimensions.
- Every geographical location where Spectra Lighting operates

RESPONSIBILITY FOR THE CODE OF ETHICS

RESPONSIBILITY FOR UPHOLDING THE CODE OF ETHICS LIES WITH:

- every employee, who must understand and adhere to the principles and values outlined in the code
- the management board, which ensures the code is integrated into the company's policies and practices
- the ethics officer, who provides guidance and support to employees regarding ethical issues and compliance
- all stakeholders and partners, who are expected to align their conduct with the ethical standards of Spectra Lighting

By collectively embracing these responsibilities, we can maintain a respectful, professional, and ethical work environment, driving Spectra Lighting towards sustainable success and industry leadership.

COMMITMENT TO COMPLY WITH BASIC LEGAL STANDARDS

At Spectra Lighting, we are dedicated to adhering to the highest legal and ethical standards. Our Code of Ethics is grounded in internationally recognized principles, including:

- Universal Declaration of Human Rights
- Charter of Fundamental Rights of the European Union
- Principles of the United Nations Global Compact
- UN Guiding Principles on Business and Human Rights

We ensure that these standards are integrated into our daily operations, guiding our ethical conduct and business practices.



YOUR RESPONSIBILITIES

IF YOU FALL WITHIN THE GROUP SPECIFIED IN THE ‘SCOPE OF APPLICATION’:

Read and Understand	Conduct Ethically	Report Violations	Support Investigations
Familiarize yourself with this Code and the violation reporting (whistleblowing) procedure	Avoid any actions that conflict with the values and principles outlined in this Code	Promptly report any identified breaches of this Code	Assist in investigating potential violations of this Code

Additionally, our management team excels in embodying Spectra Lighting’s values, setting a strong example of ethical conduct. Their leadership inspires the entire organization, fostering a culture of integrity and respect that benefits both our employees and partners.

INTRODUCTION

Spectra Lighting is dedicated to maintaining the highest ethical standards in all our operations. As a leading manufacturer located in the European Union, we align our business practices with the principles of the United Nations Global Compact and adhere to all relevant EU standards. This document outlines our commitment to human rights, labor standards, environmental sustainability, and anti-corruption measures.



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OUR VALUES AND GOALS

INTEGRITY



GOAL 16

Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

TRANSPARENCY

We maintain transparency in all our business dealings and ensure that our operations are conducted with the utmost honesty and integrity.

ACCOUNTABILITY

We hold ourselves accountable to our stakeholders and the public, consistently striving to exceed their expectations.

RESPECT



GOAL 5

Achieve gender equality and empower all women and girls

DIGNITY

We treat every individual with dignity and respect, valuing the diverse perspectives and contributions of all employees.



GOAL 10

Reduce inequality within and among countries

INCLUSIVITY

We foster an inclusive workplace where discrimination and harassment are not tolerated.

EXCELLENCE



GOAL 9

Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

QUALITY

We strive for excellence in all our products and services, continually improving to meet the highest standards.

INNOVATION

We embrace innovation, ensuring our products are at the forefront of the lighting industry.

SUSTAINABILITY



GOAL 11

Make cities and human settlements inclusive, safe, resilient and sustainable

ENVIRONMENTAL STEWARDSHIP

We are committed to sustainable practices that minimize our environmental footprint.



GOAL 12

Ensure sustainable consumption and production patterns

COMMUNITY ENGAGEMENT

We actively engage with and support the communities in which we operate.



GOAL 13

Take urgent action to combat climate change and its impacts



HUMAN RIGHTS AND LABOUR STANDARDS

Spectra Lighting is committed to upholding the highest standards of human rights and labour practices, guided by the following principles:

SUPPORT AND RESPECT FOR HUMAN RIGHTS

We support and respect the protection of internationally proclaimed human rights. Our business practices ensure that we are not complicit in human rights abuses.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We uphold the freedom of association and the effective recognition of the right to collective bargaining. Employees are encouraged to voice their opinions and participate in dialogue regarding their working conditions.

ELIMINATION OF FORCED AND COMPULSORY LABOUR

We strictly prohibit any form of forced or compulsory labor. Our supply chains are rigorously monitored to ensure compliance with this principle.

ABOLITION OF CHILD LABOUR

We are committed to the abolition of child labor. We conduct thorough audits to ensure no child labour is involved in any part of our operations or supply chains.

ELIMINATION OF DISCRIMINATION

We eliminate discrimination in employment and occupation, providing equal opportunities for all. Our policies ensure fair treatment regardless of race, gender, age, religion, or other characteristics.



EMPLOYEE TREATMENT AND RIGHTS

At Spectra Lighting, we prioritize the well-being and development of our employees:

SAFE AND HEALTHY WORK ENVIRONMENT

We provide a safe and healthy work environment, adhering to all relevant health and safety standards.

FAIR COMPENSATION

We offer fair compensation and benefits, ensuring our employees are rewarded for their contributions.

PROFESSIONAL DEVELOPMENT

We support continuous professional development, offering training and growth opportunities to all employees.

WORK-LIFE BALANCE

We promote work-life balance, providing flexible working arrangements and support for employees' personal needs.



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ENVIRONMENTAL RESPONSIBILITY

Spectra Lighting is dedicated to environmental sustainability, as outlined by the following commitments:

PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES

We adopt a precautionary approach to environmental challenges, identifying and mitigating potential impacts through proactive measures.

PROMOTING ENVIRONMENTAL RESPONSIBILITY

We undertake initiatives to promote greater environmental responsibility, ensuring our operations are sustainable and environmentally friendly.

DEVELOPMENT OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES

We invest in the development and diffusion of environmentally friendly technologies, ensuring our products contribute to a sustainable future. Certifications ISO 14001



ANTI-CORRUPTION MEASURES

Spectra Lighting is committed to fighting corruption in all its forms, including extortion and bribery. We have stringent anti-corruption policies and training programs to ensure compliance and integrity in all business dealings.



IMPLEMENTATION AND COMPLIANCE

To ensure the effectiveness of this Code of Ethics and Conduct, Spectra Lighting regularly reviews and updates its policies. We expect all employees, suppliers, and partners to comply with these principles and report any violations through our established channels.

CONTACT INFORMATION

For questions or concerns about our Code of Ethics and Conduct, please contact:

Sławomir Cytryniak

CEO of the Management Board



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CONTACT INFORMATION

Your contact for questions about the Spectra
Lighting Sustainability Strategy:

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