

**LUMINA DATAMATICS LIMITED**  
**SUSTAINABLE SOURCING POLICY**

Title	<b>Sustainable Sourcing Policy</b>		
Department	Admin	Version	1.0
Date of Effect	January 18, 2023	Date of Next Review	March 31, 2026

## 1. INTRODUCTION

With the vision to be a leader in the world of content for consistently delivering superior business value to Publishers and Retailers worldwide, we at Lumina Datamatics Limited (“the Company” / “Lumina Datamatics”), conduct business in a manner that improves welfare, health and safety of workers across our supply chain, ensures compliance with the law and adherence to ethical standards of governance and sustainability. To achieve this vision, we have put in place a policy that aligns our goals with our valued business partners and promote a culture of responsibility towards sustainability in all our stakeholders.

This policy applies to all our immediate business partners including service and supply partners (“business partner/(s)”) based on fundamental requirement of adherence to the internationally recognized standards on five core principles – Labour and Human Rights, Occupational Health and Safety, Environmental Sustainability, Business Integrity and Governance.

We are committed to work with our business partners through collaborations and improvement in their process for responsible procurement based on best practices. Aligning our business partners with this policy is a journey, not a one-time event.

## 2. OUR SUSTAINABILITY APPROACH

Lumina Datamatics under ‘Sustainable Sourcing policy’ strives to:

- Minimize risks associated with Occupational Health and Safety and to prevent injury to business partner’s employees/workers working on sites.
- Create Zero tolerance for any form of forced or compulsory child labour, slavery and human trafficking directly or through contracted labour at business partners’ sites.
- Encourage business partners to adopt principles and practices which are in line with Lumina Datamatics policies, procedures and Code of Conduct and ensure their compliance with applicable legal obligations.
- Carry out appropriate risk assessments and due diligence to promote ethical business practices and policies at our business partner level.

- Encourage and train business partners on skill enhancement, risk assessment & mitigation for sustainability management.
- Ensure appropriate and relevant information and instruction is made available to business partners on sustainability matters.
- Ensure effective business partner management systems in place and conduct evaluation of competency and sustainability performance prior to contract approval and throughout contract duration.
- Ensure that supplier and business partner's relationships are maintained in a fair, proper and transparent manner.
- Promote suitable local business partners, wherever applicable.

### **3. OUR PRACTICES:**

We have implemented practices as a step up in our strategic business decisions and it has helped us realize our goals of sustainable supply chain. We are committed to our sustainability goals, working on continuous improvement through leveraging collaboration on technology, innovation & digitalization with our business partners, for long-term value creation and mutual growth. Some of our practices are as follows –

- To use the scale and influence to contribute to a fairer, more inclusive, and more equitable way of doing business.
- Building capacity and partnerships with strategic business partners to upskill and empower the business partners to share responsibility for integrating sustainability, human rights and performance monitoring mechanism by building their own management systems & internal controls.
- Mutually collaborate with potential business partners on carbon-positive solutions to deliver benefits for both business and the environment.
- Set objectives for our internal stakeholders to take ownership for the positive impacts on supply chain sustainability - such as requesting for energy-efficient products/ solutions, considering cost- benefits from procurement through sustainable sourcing.
- Encourage our business partners to make available cost-effective, environmentally and socially responsible products and services.
- Exploring opportunities with key business partners for using raw materials that have a relatively favourable environmental footprint and preferring business partners that emphasize on sustainability practices in delivering solutions aimed at reducing Lumina Datamatics carbon footprint and improve environment performance.
- Introduce low carbon methods of transportation and travel to reduce the negative environmental effects.
- Engage in long term recycling and refurbishment contracts with our key business partners and service partners for adoption of Circular-economy practices.
- Ensuring low carbon footprint through turning waste to value wherever possible.
- Creating Business value with our sustainable supply chain partners to steadily achieve our sustainable supply chain goal.

- We are focused on enabling end-to-end solutions rather than sourcing a specific supply or service through exchange of ideas, insights for deeper engagement, knowledge acquisition and intellectual development to deliver benefits for both business and the environment.

#### **4. ESG EXPECTATIONS FROM BUSINESS PARTNERS:**

We expect our all Business partners to comply with the provisions of this Policy. We shall continuously engage with our business partners to improve the processes on following:

##### **4.1 Health and Safety**

- We expect our business partners to adopt suitable management practices in respect of health and safety which provide a high level of safeguarding for their employees, workers, contractors. We are committed to ensuring zero harm to our employees and our business partner's employees.

##### **4.2 Labour and Human Rights**

- We expect our business partners to operate in compliance with all applicable local, state and national laws regarding human rights and comply with Lumina Datamatics Health, Safety and Environment Policy. The business partners should provide a safe, healthy and fair workplace to their employees, workers, contractors etc.
- We expect our business partners to develop and implement adequate policies and procedures and trainings to protect and promote human rights managing issues such as forced and child labour, the payment of fair wages, discrimination, freedom of association and collective bargaining etc.
- In line with the UK Modern Slavery Act, 2015, we expect our business partners to work for transparency in human rights practices and take responsibility for compliance in respect of managing the modern slavery risk.

##### **4.3 Environmental Sustainability**

- We expect business partners to maintain effective policies, processes and procedures to manage their environmental impact.
- We continuously explore opportunities to work with business partners offering solutions that have a relatively favorable environmental footprint.
- We expect our Key business partners to set appropriate and measurable targets on improving resource utilizing efficiency, and reduction GHG emission.

##### **4.4 Business Integrity and Ethics**

- We expect our stakeholders to be ambassadors of our high ethical standards and share similar values of integrity, transparency, responsibility and vigilance.
- We encourage business partners to raise concerns, report any conflict of interest or business conducted through unethical practices under Lumina Datamatics Whistle Blower Policy to report grievances which facilitates open communication between management and Employees.

##### **4.5 Emergency preparedness**

- We encourage our business partners to have adequate emergency preparedness and response

plans for safeguarding their employees, operations, and security of supply in times of natural events, major catastrophe, pandemic disease, and unforeseen events.

## **5. EVALUATION AND ASSESSMENT**

Lumina Datamatics believes in working with business partners who share same values and commitment to sustainability goals. We strive to establish a transparent supply chain that meets our minimum Health and Safety, Human Rights, Ethical and Environmental standards.

We acknowledge the positive contributions we can make to economic, environmental and social factors in operations and supply chain, but also recognize significance of putting in place Risk based framework to identify, prevent, mitigate and account for actual and potential adverse impact related to corporate governance, human rights, the environment, Integrity and ethics.

To prevent potential (future) adverse impacts and address actual impacts, we support and / or collaborate with relevant business relationships in developing fit-for-purpose plans for our supply partners to prevent or mitigate adverse impacts identified within reasonable and clearly defined timelines. Also, we support relevant supply chain partners to mitigate adverse impact or risks through training, knowledge sharing, upgrading or strengthening of their management systems.

## **6. REVIEW**

We review performance of this Policy on a periodic basis to ensure continuous management of business partners.

Approved by

**For and on behalf of Board of Directors**

**Sd/-**

**Sameer Kanodia**  
**Managing Director & CEO**