

LUMINA DATAMATICS LIMITED
STAKEHOLDER ENGAGEMENT POLICY

Version	1.0
Department	Legal and Secretarial
Approved By	Board of Directors at their meeting held on July 31, 2024
Effective Date	July 31, 2024

Lumina Datamatics Limited (“**Lumina Datamatics**”) believes stakeholder management and effective engagement with them forms a crucial part of any business operation, which in turn helps develop openness and trust. We strive to provide long-term sustainable value to our stakeholders such as investors, employees, customers, business partners and suppliers, government and communities. Effective stakeholder engagement on an ongoing basis is essential for us to identify the opportunities and concerns arising from stakeholders’ material issues and work towards their effective resolution.

While the process of stakeholder engagement is decentralized and respective functional teams are ultimately responsible for our group’s stakeholder engagement efforts, the Company’s approach to stakeholder engagement is governed by this Stakeholder Engagement Policy (“**Policy**”), read in conjunction with our Code of Conduct.

The Stakeholders Engagement policy provides Company’s broad approach and overarching framework in identifying, engaging, and managing stakeholders.

1. SCOPE

This Policy provides our overarching approach for engaging with our stakeholders. It has been put in place to ensure that the stakeholder engagement is applied consistently across the operational boundary of Lumina Datamatics.

Each business unit in every operating location is required to carry out stakeholder engagement in accordance with the principles of this policy, and to ensure that they maintain and commit to play a role in nurturing the Company’s stakeholder relationships.

2. OBJECTIVE

The objectives of this Policy are:

- to outline the methodologies, systems and processes for identifying and engaging with stakeholders;
- to continue to enhance stakeholders’ trust and confidence in our processes and activities, while promoting a good understanding of stakeholders’ needs and expectations;
- to improve the communication to engage stakeholders; and
- to convey and reinforce Lumina Datamatics’s commitment towards all its stakeholders.

3. STAKEHOLDER IDENTIFICATION AND PRIORITIZATION

We identify stakeholders as those individuals, groups of individuals or organizations that affect us and/or could be affected by our activities, services and the associated performance. Lumina Datamatics analyses its internal and external environment to identify its internal and external stakeholders, which may include those individuals, groups of individuals and/or organisations:

- that are directly or indirectly dependent on Lumina Datamatics activities, products or services and associated performance, or on whom Lumina Datamatics is dependent in order to operate;
- to whom Lumina Datamatics has, or in the future may have, legal, commercial, operational or ethical/moral responsibilities; and;
- who can influence or have impact on Lumina Datamatics strategic or operational decision-making;

Our key stakeholders include:

- Investors
- Customers and tenants
- Employees
- Communities
- Business partners
- Financial service providers
- Regulatory and government bodies
- NGOs/Social organizations
- Media

Stakeholders are prioritized based on the relevance and profiled into different categories depending upon the specific context of engagement.

4. WE STRIVE TO ABIDE BY THE FOLLOWING WHEN ENGAGING WITH ANY STAKEHOLDER:

- 1) Maintaining positive legal compliance to applicable stakeholder engagement and disclosure regulations and conforming with the requirements of the Lumina Datamatics Sustainability Framework;
- 2) Appropriate designing of engagement methods which are transparent, inclusive, complete, material and culturally appropriate;
- 3) Suitable resources and responsibilities shall be assigned for effective stakeholder engagement;
- 4) Endeavor to warrant that the ensued benefits from the value generated by the business gets fairly distributed within all stakeholder groups and any disputable issues are resolved in an impartial and equitable manner;
- 5) Any ensuing stakeholder differences or grievances shall be addressed in an unbiased, fair, judicious and constructive manner;
- 6) Establishing clear accountability by assigning adequate resources and responsibilities for effective stakeholder engagement;

- 7) Stakeholder engagement activities information will be disclosed on an annual basis;
- 8) Stakeholder engagement methods shall be kept participatory and non-discriminatory to ensure healthy interactions;
- 9) Efforts shall be taken by Lumina Datamatics to continually improve the stakeholder engagement process;
- 10) Various communication channels will be used to promote and generate awareness on ESG, principles and stakeholder engagement methods across different levels of the organization.

5. STAKEHOLDERS' CONCERNS

Should a stakeholder have any queries or concerns or require any clarifications relating to the Company may write to the Company at marketing@luminad.com.

Frequency of Stakeholders Engagement Mechanisms shall be decided by the committee/Board of Directors from time to time.

This policy shall be reviewed periodically for its suitability and updated as necessary.
