

## Internal Code of Conduct

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Prepared by: Luminex Solutions

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### 1. Purpose and Scope

This Code of Conduct defines the standards of integrity, professionalism, and ethical behaviour expected of all employees, contractors, consultants, and representatives of Luminex Solutions. It serves to:

- Uphold our values across operations in Jordan, Syria, and Lebanon
- Ensure compliance with international law, local regulations, and our internal policies
- Foster a culture of accountability, respect, and transparency

This Code applies to all personnel, regardless of role, contract type, or location.

### 2. Core Values

All personnel are expected to act in accordance with Luminex Solutions' core values:

- Integrity: We do what is right, not what is easy
- Respect: We treat all people with dignity and fairness
- Accountability: We take responsibility for our actions and decisions
- Discretion: We maintain confidentiality and protect client information
- Professionalism: We operate with discipline, reliability, and competence

### 3. Compliance with Laws and Regulations

All personnel must:

- Abide by the laws of Jordan, Syria, Lebanon, and any jurisdiction in which they operate
- Respect international human rights, humanitarian law, and the UN Guiding Principles on Business and Human Rights
- Comply with anti-corruption, anti-bribery, and counter-terrorism financing laws

#### **4. Human Rights and Equal Treatment**

We uphold and implement our Human Rights Policy. All staff must:

- Treat colleagues, clients, and community members with fairness and without discrimination
- Never engage in harassment, abuse, intimidation, or exploitation
- Report any suspected human rights violations or unethical behaviour through the appropriate channels

#### **5. Conduct in the Field and on Assignment**

Given the nature of our work in sensitive and potentially hostile environments, staff must:

- Maintain a professional appearance and low profile, respecting local customs and cultures
- Follow security protocols and operational briefings without deviation
- Avoid behaviour that could compromise team safety or the company's reputation
- Report all incidents, accidents, and breaches of conduct immediately

#### **6. Conflicts of Interest**

Personnel must avoid situations where personal interests conflict with company interests.

This includes:

- Undisclosed financial interests in client or supplier companies
- Accepting gifts or favours that could influence decision-making
- Engaging in outside employment that may compromise job performance
- Any potential conflicts must be declared to management.

#### **7. Confidentiality and Data Protection**

All personnel are responsible for safeguarding:

- Confidential business and client information
- Personal data of employees, clients, and stakeholders
- Operational security details, locations, and routes
- Disclosing sensitive information without authorisation is a disciplinary offence.

#### **8. Use of Company Resources**

Company equipment, vehicles, facilities, and communication tools must be used responsibly and only for legitimate business purposes. Unauthorised use, negligence, or deliberate damage may result in disciplinary action.

#### **9. Drugs, Alcohol, and Weapons**

- The use or possession of illegal drugs is strictly prohibited
- Alcohol may only be consumed responsibly and never during working hours or while on duty

- Firearms and weapons must only be used by authorized personnel and in accordance with applicable laws and company SOPs

## **10. Reporting Misconduct and Whistleblowing**

Luminex Solutions encourages a speak-up culture. All personnel have a duty to report:

- Violations of this Code of Conduct
- Unlawful or unethical behaviour
- Safety or security concerns

Reports can be made confidentially via: [ethics@luminex-solutions.com](mailto:ethics@luminex-solutions.com)

## **11. Breaches and Disciplinary Action**

Violations of this Code may result in disciplinary action, including:

- Verbal or written warnings
- Suspension or termination of contract
- Legal action where applicable

All disciplinary measures will be handled in accordance with company policy and due process.

## **12. Acknowledgment**

All personnel are required to read, understand, and sign this Code of Conduct upon onboarding and whenever updated.

Version Control

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