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Modern Slavery and Human Trafficking Statement (FY 2021)

This document sets out the policy of the laser and photonics branch of Lumibird and its subsidiaries (collectively, “**Lumibird Photonics**”) against modern slavery and human trafficking, pursuant to section 54(1) of the United Kingdom’s Modern Slavery Act 2015, as amended from time to time. It describes the steps and procedures Lumibird Photonics has implemented and is implementing to ensure that modern slavery and human trafficking is not taking place in its supply chain or in any part of its activities. Lumibird Photonics is committed to improving out practices to combat slavery and human trafficking.

This modern slavery and human trafficking statement for the 2021 fiscal year has been adopted by the Board of Directors of Lumibird SA and executed by Mr. Marc Le Flohic, Chairman of the Board of Directors and CEO of Lumibird SA.

1. About Lumibird and the Organisation’s structure

Born from the combination of Keopsys group with Quantel in October 2017, the Lumibird group is one of the world’s leading specialist in lasers with 50 years of experience in designing, manufacturing and distributing solid state laser, laser diodes and fibre laser technologies for scientific (laboratories and universities), industrial (manufacturing, defence and Lidar sensors) and medical (ophthalmology) markets.

Due to Lumibird Photonics’ worldwide operations and varied product offerings, Lumibird Photonics relies on various internal and external resources comprising a large number of employees, suppliers, local partners or distributors to which it applies a zero-tolerance policy prohibiting any form of slavery or servitude, forced or compulsory labour, human trafficking or child labour (“**Modern Slavery**”).

2. Suppliers Policies against Modern Slavery

As a leading laser products manufacturer, Lumibird Photonics chooses its suppliers following a procedure taking into account their compliance with, and sensitiveness to, Modern Slavery issues.

Before entering into any commercial relationship, Lumibird Photonics usually perform a due-diligence process over the supplier's policies and procedures with a view to evaluating and addressing issues relating to its compliance with applicable laws and regulations. Afterward, throughout the business relationship, Lumibird Photonics frequently reminds to its suppliers their obligations and commitments in connection with Modern Slavery with a view to give them the opportunity to improve their processes. In case of doubt about their compliance with Modern Slavery rules, the supply agreements entered into by Lumibird Photonics usually provide Lumibird Photonics with rights to conduct audits and, if necessary, on-site due-diligence sessions.

These audits or on-site due-diligence sessions are generally initiated and performed by the central purchasing department of Lumibird Photonics (in coordination with the group quality and R&D departments) and primarily focus on quality management systems and performance against Lumibird Photonics' business requirements and include targeted questions regarding the supplier's efforts to prevent Modern Slavery.

In non-OECD countries where Lumibird Photonics has significant activities, such as China, the risk of Modern Slavery is higher than in Lumibird Photonics' core jurisdictions (namely Europe, US, Australia). Accordingly, Lumibird Photonics plans to reinforce its control process in these jurisdictions in particular by decentralizing its purchasing department and establishing local divisions to get closer to local suppliers.

In the event any audit or enquiry shows a breach by a supplier of applicable laws, regulations and internal procedures relating to Modern Slavery, this could result in immediate action up to and including termination of the business relationship, reduction in benefits and possible referral to appropriate legal authorities.

3. Internal Policies against Modern Slavery

All Lumibird Photonics employees must observe Lumibird Photonics' internal policies, which require compliance with all applicable laws, regulations and internal procedures relating to Modern Slavery.

In particular, Lumibird Photonics strives to hire qualified people which have been, and ensure that its workforce is permanently, adequately trained and sensitized with these matters. To this effect, each employee must report, to a dedicated supervisor (head

of the central purchasing department), any breach of the above-mentioned laws, regulations and internal procedures relating to Modern Slavery.

Any violation of this policies could result in professional, disciplinary or legal action up to and including termination of employment or dismissal from an non-employment association with Lumibird Photonics, as the case may be, and possible referral to appropriate legal authorities.



Mr. Marc Le Flohic

Chairman of the Board of Directors
and CEO of Lumibird SA