

code
of cooperation

lamoda



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Code of Cooperation

Preamble

In the conduct of our business, we adhere to the principles of honesty, integrity, and fair allocation of risk in our relationships with Partners, and we expect the same approach from our counterparties.

The rules and principles set forth in this document are binding on all contractors, suppliers, and other counterparties of Lamoda, and form an integral part of any agreement entered into by Lamoda.

If, due to the nature of the agreement with a counterparty, any rule set forth in the Code cannot be applied, it shall be deemed excluded from the agreement. Within the framework of agreements, Lamoda may specify the procedure for applying the rules set forth in the Code.

Terms

Lamoda is Kupishuz LLC (OGRN (state reg. No.) 5107746007628, INN (taxpayer ID) 7705935687).

The Partner is a legal entity or individual that has entered into an agreement with Lamoda or is negotiating with Lamoda to enter into an agreement, regardless of the organizational and legal form of such legal entity or individual and the subject matter of the agreement.

Lamoda's Code is a set of general rules and principles that apply to any cooperation with Lamoda. Available at: <https://www.lamoda.ru/lp/terms>.

The Parties are Lamoda and the Partner.

The Agreement constitutes agreements, appendices, specifications, and other understandings between the Parties, including the provisions of the Code accepted by the Parties.

Anti-Corruption Policy

Lamoda operates a policy of zero tolerance of corruption, and any violation of this section shall result in penalties under applicable law, as well as termination of the Agreement.

Lamoda and the Partner strictly prohibit their employees, officials, and contractors from giving or receiving anything of value, directly or indirectly, to or from any individual, company, or government official, agent, or employee, anywhere in the world, as a reward for assistance or influence.

The Parties and their employees, officials, directors, and Partners shall not suggest, offer, give, request, or receive any form of bribe, payment, kickback, or incentive, either directly or through an intermediary or any other third party. Facilitation payments of any kind are strictly prohibited.

Kindly report any violations at: <https://lamoda-ethic.csi-hotline.ru/>

Gifts

Gifts are a standard part of business relationships. That said, we adhere to our principles in respect of gifts also.

It is prohibited to use cash or cash equivalents (securities, cryptocurrency, checks, etc.) as gifts

Gifts in material and non-material form (e.g., entertainment) with a market value in excess of RUB 5,000, including e-gifts, are permitted only with the approval of Lamoda Compliance. Gifts during deal negotiations or tender procedures, as well as gifts that could create a conflict of interest, are not permitted.

Gifts should not be too frequent and should not create a sense of debt or obligation on the part of the recipient.

Conflict of Interest

A conflict of interest is a situation in which a personal, financial, or political interest interferes or may interfere with an employee's ability to make sound decisions on behalf of the Partner or Lamoda in relationships with third parties.

An example of a conflict of interest could be an employee's participation in a decision to purchase goods from a company where the employee or a member of their family serves as CEO or similar.

If the Partner is aware of a conflict of interest, or there are reasonable grounds to suspect a conflict of interest, the Partner must immediately notify Lamoda Compliance.

Respect for Employee Rights

Health and safety

Employees must be provided with safe, healthy, and hygienic working conditions free from risk and threat to life or health. Employees must undergo appropriate safety training and be equipped to handle hazardous materials and tools. Employees trained in first aid, as well as properly stocked first aid kits, must be present at all production facilities.

Anti-discrimination

Employees must not be discriminated against in the workplace (including in terms of hiring, compensation, promotion, and discipline) on the basis of gender, race, religion, caste, or any other grounds.

Anti-harassment and bullying

Offensive behavior, harassment, or any other inappropriate behavior is unacceptable in any form (verbal, physical, or visual). Employees must be able to voice concerns or raise issues related to working conditions with management without fear of punishment, loss of

employment, or other retaliatory measures.

Respect for the rights of migrant workers

Migrant workers employed by the Partner on any basis shall enjoy the same guarantees with regard to occupational health and safety, prohibition of discrimination, and compliance with all requirements established by applicable law. The employer shall bear all costs associated with hiring a migrant worker. The employer does not have the right to require migrant workers to surrender identification documents or otherwise restrict their physical freedom or property rights, including the freedom to exercise control over their own labor.

Compliance with Environmental Standards

The Parties shall take reasonable measures to avoid adverse impacts on human health and/or the environment by minimizing pollution from production activities and rationalizing the use of natural resources, including energy and water.

The Partner and Lamoda shall comply with environmental law, including in the area of production and consumption waste management.

Risk Allocation and Liability

Lamoda adheres to a fair approach to risk allocation in the conduct of its business. We bear responsibility and shall indemnify the Partner for damages caused by our actions/inaction, as well as the actions/inaction of our employees.

We expect the Partner to adhere to the same principles in the conduct of its business. If the Partner's actions/inaction or breach of obligations or warranties result in negative consequences for Lamoda, the Partner shall compensate for such negative consequences.

However, the nature of some of Lamoda's business processes does not allow for an accurate assessment of the amount of losses; therefore, agreements may stipulate special liability measures for specific cases.

Compliance with Law

The Parties shall comply with all applicable laws, regulations, industry standards, and other rules binding on their activities.

Compliance of the Partner and its activities with all applicable rules and regulations is an essential condition of agreements entered into by Lamoda. In addition, the Parties shall exercise due diligence in the selection of counterparties.

Fair Competition

The Partner and Lamoda adhere to the principles of fair competition in their activities. Violation of antitrust law and other laws regulating trade may result in civil, administrative, and criminal liability.

The Parties shall exclude from their practice any actions that unreasonably restrict trade. Deviation from the principle of fair and honest competition by the Partner is the ground for termination of cooperation.