

# Policies & Guidelines 2026

# Code of Conduct

Our Code of Conduct gives us guidance on how to live by our values and deliver on our purpose. It guides us in how to resolve potentially difficult situations and helps us communicate and seek guidance on issues that could compromise our values and our business.

We adhere to high standards of ethics and business morals in all our operations and relations. We conduct our business in an environmentally and socially responsible manner and behave appropriately towards all of our stakeholders – our customers, suppliers, co-workers, shareholders, governments and non-governmental organisations (NGOs), children and the communities in which we operate as well as other parties that interact with Lindéngruppen. The Code of Conduct is an overarching document to which our policies and internal procedures are linked.

## **We Base Our Code of Conduct on Universal Principles**

We respect human rights and support and act in the areas of labour standards, environmental protection and anti-corruption in line with the principles expressed in the Universal Declaration of Human Rights, the ILO Core Conventions, the UN Convention on the Rights of the Child, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprise, the OECD Due Diligence Guidance for Responsible Business Conduct, the Children's Rights and Business Principles and the United Nations Global Compact.

In line with these international standards, we operationalise our respect of human rights and our commitment to environmental protection through conducting human rights and environmental due diligence (which together we refer to as sustainability due diligence). This entails the following internationally-recognised steps of the due diligence process:

- Embedding respect for human rights and environmental protection in policies and management systems
- Identifying and prioritising actual and potential severe human rights and environmental impacts in our own operations and value chain
- Taking appropriate action to prevent, mitigate and/or cease prioritised human rights or environmental impacts which we may be causing, or to which we may be contributing or to which we may be directly linked
- Providing accessible channels for rightsholders and other stakeholders to raise grievances about actual or potential adverse human rights or environmental impacts

- Providing or contributing to the provision of remedy, including to affected rightsholders where appropriate, in cases where we have caused or contributed to severe adverse human rights or environmental impacts
- Tracking the effectiveness of the due diligence actions taken
- Communicating about the due diligence process, actions and effectiveness thereof

### **The Code of Conduct Applies to All of Us**

Our Code of Conduct applies to all co-workers, management and directors of the Group. It is to be adopted and followed by all companies in the Group.

As a leader in the Group, you have a particular responsibility to lead by example and conduct business in accordance with our Code of Conduct. You make sure that your co-workers are provided with the training necessary to understand the Code of Conduct and the policies related to it.

### **We All Commit to the Code of Conduct**

As a Group we are all committed to the Code of Conduct. We are all expected to read and understand our policies and this Code of Conduct. We shall take appropriate actions to inform our co-workers in a clear and transparent manner.

### **The Code of Conduct is Reviewed Annually**

We review our Code of Conduct annually and are committed to making changes in its content and implementation when circumstances so demand.

## **1. Our Workplace**

### **We Believe in Freedom of Association**

All co-workers are free to join associations of their own choice and have the right to collective bargaining. In countries where these practices are legally restricted, we strive to have parallel means in place to allow concerns to be brought to management attention.

### **We Have Fair Working Terms and Conditions**

Employment is freely chosen and all co-workers should know the basic terms and conditions of their employment and have prompt and easy access to information such as governing policies, instructions and other information affecting their employment. Salaries, including overtime and benefits, shall equal or exceed local legal and industry minimum standards as well as provide decent living.

We do not use child labour. Co-workers must be at least 16 years of age or have reached national school-leaving age upon completion of compulsory schooling, whichever is higher. The minimum age for hazardous work is 18 years. Under no circumstances will forced or any other forms of involuntary labour be used in our operations. We do not tolerate working conditions or treatment in conflict with international laws and practices.

### **We Protect Personal Information**

We protect our co-workers' personal information. We handle personal information responsibly and in compliance with laws and regulations in the countries where we operate.

We are committed to protecting and respecting our co-workers' right to privacy and integrity, and we will always aim to protect our co-workers' personal data in an appropriate manner with adherence to applicable Data Protection Privacy Laws. We adhere to the data protection principles, meaning personal information we hold and process about our co-workers must be used lawfully, fairly and in a transparent manner.

**We Commit to Health and Safety**

All our activities are conducted with respect for co-workers' health, safety and privacy. All co-workers shall be provided with a safe and healthy working environment. With leadership and work practices we create a culture where every person takes appropriate action to prevent workplace accidents and illnesses, and where we promote psychological and physical health and well-being for all our people.

**We Promote Diversity, Inclusion and Equal Opportunities**

Diversity, inclusion and equal opportunities lead to innovation, motivation and high performance. All co-workers must be treated equally and have equal opportunities. Aligned with the UN Universal Declaration of Human Rights and The Core ILO Conventions, we do not accept any form of discrimination. All co-workers are treated with respect and dignity. We have zero tolerance for any discrimination, abuse or harassment.

**We Believe in Continuous Learning and Development**

We encourage our co-workers to actively develop their skills, and to help colleagues to develop theirs. We embrace constructive feedback as an important means to grow.

**We Keep Accurate and Complete Records**

All business transactions and payments within each unit of Lindéngruppen and its companies must be recorded in a timely and accurate manner. We follow strict accounting principles and standards and have appropriate internal controls and processes to ensure that accounting and financial reporting comply with Lindéngruppen's and its companies' respective reporting manuals together with all applicable laws and regulations.

**We Protect Our Assets**

We protect Lindéngruppen's and its companies' assets (tangible and intangible) from damage, loss and criminal acts, as our assets are vital to our business. We only use assets for business purposes unless otherwise approved by management. We never use company assets for personal gain or for illegal activities.

## **2. Our Business Environment**

**Our Suppliers are Our Business Partners**

We cooperate with our suppliers and expect the same level of integrity, honesty and ethical behaviour from them as they can expect from us. Our commitment to the fundamental principles of human rights (including children's rights), labour rights, environmental protection and the fight against corruption throughout our operations – as outlined above – extends to our expectations of our suppliers' suppliers.

As part of our sustainability due diligence process, we endeavour to identify and assess human rights and environmental risks and opportunities before engagement with suppliers and business partners, following a risk-based approach, and to contract with subcontractors and suppliers who themselves commit to respect international human rights and to adhere to environmental laws and good practices through undertaking sustainability due diligence.

We also strive to monitor their performance and to take immediate and thorough steps to cease, prevent and/or mitigate adverse human rights and environmental impacts in our supply chain, and – where we may be causing or contributing to severe adverse impacts – to provide or contribute to the provision of remedy. We are transparent about this sustainability due diligence process, including through our sustainability reporting.

Our expectations of our suppliers and business partners in this area are elaborated in our Supplier Code of Conduct.

#### **We Protect Business Critical Information**

All information obtained at work should be considered and treated as confidential and business critical unless it is freely and publicly available. Confidential information should only be used for its intended purpose and never be disclosed to anyone other than co-workers or other authorised representatives of Lindéngruppen who have a direct and legitimate need-to-know. The obligation to keep information confidential continues even after a co-worker leaves Lindéngruppen.

### **3. Our Community**

#### **We Comply with Laws and Regulations**

With a global presence we are all subject to a wide range of legal requirements. We shall comply with all applicable laws and regulations that relate to our activities in the countries where we operate.

It is the responsibility of each co-worker, manager and director to make sure that they are aware of and abide by the laws and regulations that apply to them in their respective positions as representatives of Lindéngruppen.

#### **We Have Zero Tolerance for Bribery and Corruption**

We always make business decisions in the best interest of Lindéngruppen and our Group companies. Business decisions are not influenced by personal considerations or relationships. All co-workers must avoid engaging in activities that could lead to any conflicts of interest. We disclose all conflict of interest situations in accordance with applicable policies, procedures and guidelines. Our business is conducted with integrity and we have zero tolerance for all forms of bribery and corruption. We do not directly or indirectly (through third parties) pay or offer to pay bribes.

We do not offer or accept any gifts that will improperly influence our business decisions.

We are committed to comply with all relevant anti-money laundering legislation.

### **We Reduce Our Climate-Related and Environmental Footprint**

Sustainability is our way of ensuring that the positive impacts we generate far outweigh our negative ones. To achieve environmental and climate responsibility, we must reduce the climate-related and environmental footprint of our products and operations as well as promote products, services and practices that help others along our value chain reduce theirs.

We support life cycle thinking and a precautionary principle to environmental challenges. We strive to minimise negative climate-related and environmental impact from our operations and products and to apply the substitution principle. We will fulfil or exceed environmental legal requirements, regulations and international conventions applicable in the countries where we operate. As part of our sustainability due diligence process, all our companies are required to identify and analyse the climate-related and environmental impacts and consequences of their operations and products and have appropriate environmental management systems in place to manage them.

Our expectations in this area are further elaborated in the Environmental Policy.

### **We Ensure Efficient and Accurate Tax Payments**

Tax payments are an important part of our contribution to society. Every company has to pay their due taxes in the country where they conduct their business. We are committed to transparency on taxes paid on a country basis. Developing structures solely for the purpose of avoiding taxes is unacceptable practice.

### **We Communicate Honestly, Transparently and Timely**

In all our communications, both written and spoken, we are committed to being open, truthful and accurate within the limits of commercial confidentiality. We provide reliable and relevant information on our activities in a timely manner. We see interaction as important and have a positive attitude towards constructive dialogues with all our stakeholders.

### **We Participate in the Communities Where We Live and Work**

All our activities are conducted with respect for the wellbeing of the local communities where we operate. Our co-workers are encouraged to play an active role in society, including through activities in political parties. We also encourage our co-workers to actively participate in the communities where they live and work and to propose community involvement projects to management. Lindéngruppen maintains a neutral position with respect to political parties but stands firm in its respect for, and commitment to the rights and freedoms recognised in the Universal Declaration of Human Rights.

## **4. Living Our Code of Conduct**

The Code of Conduct applies to all of us and guides our work and activities every day. As a co-worker, it is your responsibility to read the Code of Conduct, regularly use it for reference and react to any breaches of it that you witness.

## The Lindéngruppen Policies & Guidelines

You are also responsible for following any policies relevant for your position and work. The Code of Conduct cannot cover all situations that you may face and sometimes the right way to act is not obvious. When you have questions, do not hesitate to ask for help.

Management within Lindéngruppen's companies will not be held accountable for any loss of business resulting from compliance with this Code. There shall be no retaliation or other negative consequences for persons reporting in good faith.

### **Concerns with the Code or Breaches of the Code**

We support open and fair discussion of issues and concerns. Co-workers are encouraged and expected to report all incidents of non-compliance or suspected non-compliance with this Code of Conduct. Do not hesitate to contact your manager or Human Resources if you have questions or seek guidance.

Failure to comply may result in civil and criminal liability and/or disciplinary action, including termination of employment.

### **Whistleblowing**

If you have concerns about possible violations of this Code of Conduct you have a responsibility to:

- Discuss your concerns with your manager as soon as possible
- If not possible, speak to another manager or contact Human Resources
- If you wish to remain anonymous, report your concern through one of the contacts below

Co-workers can use our confidential "whistleblowing" telephone number or e-mails. These can be used to bring concerns and issues to the attention of the Lindéngruppen management or the Lindéngruppen Board of Directors, who will in turn make every effort to maintain the anonymity and confidentiality of those reporting.

In addition to the whistleblowing channels provided at Group level, Group companies shall establish their own local whistleblowing systems. These local systems must be legally sound, accessible, secure and reflect the operational needs of the respective Group company. The system shall ensure that it is possible to report a complaint in local languages, anonymously and without retaliation. Each local system must also include access to external legal expertise to ensure legal compliance, impartiality and proper handling of reports.

## Contacts

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codeofconduct\_management@lindengruppen.com

codeofconduct\_board@lindengruppen.com

External contact: Fredrik Widjer, fredrik.widjer@hwf.se, +46 709 777 216

Advice or guidance on the interpretation of this Code of Conduct is available from the Chief Legal Officer or Chief Communication and Sustainability Officer of Lindéngruppen.

- Chief Legal Officer, jb@lindengruppen.com or +46 732 01 71 09
- Chief Communication and Sustainability Officer, jj@lindengruppen.com or +46 733 23 08 11

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