

Beckers Group

Supplier Code of Conduct

1. Purpose

At Lindéngruppen and our Group companies, we are committed to conducting our business in an environmentally and socially responsible manner in line with applicable international standards, and behaving appropriately towards all of our stakeholders, including our suppliers and business partners.

This Supplier Code of Conduct is used by our wholly owned companies and serves as inspiration and guidance for what our part owned companies require from their suppliers.

The Supplier Code of Conduct describes our expectations and mandatory requirements of our suppliers and business partners with regard to environmental, social and governance issues.

2. Scope and definitions

The Code applies to all Lindéngruppen's and its Group companies' direct suppliers and is expected to be cascaded by our suppliers and business partners to all subsequent tiers of the supply chain.

For the purposes of this Code:

- A “supplier” or a “business partner” is defined as any entity that has a contractual or commercial agreement with Lindéngruppen or any of its Group companies
- “Commitments” of suppliers or business partners, which may be reflected by use of the modal verbs “shall” and/or “must”, describe actions that are a mandatory requirement
- “Expectations” of suppliers or business partners, which may be reflected by use of the modal verbs “may” and/or “should”, describe actions that Lindéngruppen and its Group companies strongly encourage suppliers or business partners to take

3. Commitments and Expectations

3.1 Compliance with Applicable Laws

- Suppliers and business partners shall ensure that their products, services and operations comply with all relevant and applicable laws that relate to activities in the countries in which they operate

- Suppliers and business partners must obtain and maintain all required operating licenses and permissions, including environmental permits and registrations, and operate within the stipulated limits
- Suppliers and business partners are expected to have appropriate systems and processes in place to ensure such compliance

3.2 Alignment with International Standards of Responsible Business Conduct

- Suppliers are expected to adhere to high ethical and business moral standards in all operations and relationships.
- Lindéngruppen and its Group companies expect our suppliers and business partners to align with internationally-recognised standards and conventions regarding human rights and environmental protection and other aspects of responsible business conduct, including:
 - The UN Universal Declaration of Human Rights
 - The UN International Bill of Human Rights
 - The International Labor Organization (ILO)'s Declaration on Fundamental Principles and Rights at Work
 - The UN Convention on the Rights of the Child
 - The UN Guiding Principles on Business and Human Rights
 - The OECD Guidelines for Multinational Enterprises
 - The OECD Due Diligence Guidance for Responsible Business Conduct
 - The Ten Principles of the United Nations Global Compact
 - The UNICEF Children's Rights and Business Principles
 - The 17 Sustainable Development Goals of the United Nations
- Suppliers and business partners are expected to operationalise these commitments through, inter alia, conducting human rights and environmental due diligence (which we refer to collectively as sustainability due diligence), particularly in respect of operations where they are acting in connection with our operations, including through 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
 - Taking appropriate action to prevent, mitigate and/or cease any adverse human rights or environmental impacts which the company may be causing, or to which the company may be contributing or to which it 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 suppliers may 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

- To ensure the best protection of human rights and the environment in our value chain, where national laws are not aligned with these internationally-recognised standards and conventions, the more stringent standards should be applied
- Further expectations with regard to responsible business conduct are provided below

3.3 Provision of Responsible Business Conduct Training

- As part of the commitment to embed respect for human rights, suppliers and business partners are expected to provide regular training to their employees on human rights and ethical labour practices, and to foster a culture of respect and responsibility to all people involved in or impacted by its operations

3.4 Human Rights in Conflict Situations

- Suppliers and business partners shall not use any raw material directly or indirectly financing armed groups that violate human rights, such as conflict minerals

3.5 Prohibition of Forced and Child Labour

- Suppliers and business partners shall not engage in or support the use of child labour, as defined in the ILO Core Conventions
- Suppliers and business partners shall ensure their operations do not adversely affect children's rights, including their rights to education, health and safe living conditions, in line with the Children's Rights and Business Principles
- Suppliers and business partners shall ensure that all work carried out in their operations is conducted voluntarily and without forced or compulsory labour in all of its forms. Suppliers and business partners shall not engage in or support any form of forced labour, human trafficking or any other forms of involuntary labour
- Workers shall not be required to pay recruitment fees to secure their employment, in line with the Employer Pays Principle, shall not have identification documents withheld and shall have the freedom to terminate their employment upon serving reasonable notice and without penalty

3.6 Fair Wages and Working Conditions

- Suppliers and business partners shall provide fair and adequate wages in compliance with applicable laws and should aim to exceed minimum wage standards where possible in accordance with applicable living wage benchmarks, such as those provided by Wageindicator.com
- Working hours, rest periods and benefits must at minimum comply with applicable labour laws
- All employees shall be free to join associations of their own choice and shall have the right to collective bargaining. In countries where these practices are legally restricted, suppliers should strive to have parallel means in place to allow concerns to be brought to management's attention

3.7 Health and Safety

- Suppliers and business partners shall ensure safe, healthy and hygienic working conditions for all workers. Suppliers and business partners must:
 - Provide and maintain safe working conditions to protect workers, customers and the public
 - Ensure that the right processes are in place to assess, document and address health and safety risks, and implement mitigation measures

- Offer necessary safety training and ensure adequate and appropriate protective equipment is available and in use according to local working conditions for all workers

3.8 Community Engagement and Social Inclusion

- Suppliers and business partners are expected to engage with the local communities to address environmental and social impacts, and make a positive contribution to local sustainability initiatives, including enabling access to products and services

3.9 Climate Change

- Suppliers and business partners are expected to implement measures to reduce greenhouse gas emissions in alignment with the goals of the Paris Agreement – such as measures to improve energy efficiency and use of renewable energy – and are encouraged to set science-based emission reduction targets for greenhouse gases and other pollutants
- Suppliers and business partners should strive to reduce their environmental footprint by conducting regular environmental impact assessments

3.10 Pollution

- Suppliers and business partners shall comply with all relevant chemical safety laws to protect human health and the environment from the risks posed by chemicals, including the Regulation on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) in the EU and UK
- Suppliers and business partners shall adhere to restrictions on hazardous chemical substances and eternal pollutants, and seek non-hazardous alternatives wherever possible
- Suppliers and business partners should adopt practices to reduce emissions to air, water and soil, and minimise the use of microplastics, where applicable

3.11 Water

- Suppliers and business partners should adopt practices to ensure that water is used in an efficient and sustainable manner, and that effluent is treated properly

3.12 Resource Use, Circular Economy and Waste

- Suppliers and business partners shall ensure the safe disposal of hazardous waste and manage waste in accordance with legal requirements whilst striving to follow industry best practices
- Suppliers and business partners should adopt practices to ensure the use of resources is conducted in an efficient and sustainable manner
- Suppliers and business partners are expected to strive to minimise waste generation through reduction, re-use and recycling initiatives

3.13 Protection of Biodiversity

- Suppliers and business partners are expected to work to protect biodiversity by avoiding or eliminating any harmful impacts of their operations on ecosystems
- Where operations impact biodiversity, suppliers and business partners are expected to engage in conservation efforts

3.14 Animal Welfare

- Suppliers and business partners are expected to respect the welfare of animals

3.15 Ethical Conduct and Anti-Bribery and Corruption (“ABC”)

- Suppliers and business partners are expected to act with uncompromising levels of ethical business conduct and integrity in all interactions
- Suppliers and business partners are expected to adhere to ethical business practices as expressed in the ten principles of the United Nations Global Compact
- Suppliers and business partners shall implement appropriate policies and grievance mechanisms to ensure that their employees and representatives are required not to engage in bribery and corruption

3.16 Data Privacy and Security

- Suppliers and business partners must collect and handle personal information responsibly and in compliance with all applicable contractual and legal obligations
- All information obtained by suppliers and business partners in relation to Lindéngruppen or its Group companies shall be considered confidential unless it is freely and publicly available. The obligation to keep information confidential continues even after the end of the commercial relationship with a supplier
- Suppliers and business partners shall implement technical and organisational measures to protect personal information and only use that information for the legitimate purposes for which it is collected
- Suppliers and business partners should conduct regular training of employees, audits of their own systems and practices as well as adopting advanced technology to ensure high standards of cyber-security

3.17 Supply Chain Transparency

- Suppliers and business partners are expected to:
 - Show transparency in their supply chains and disclose sustainability-related risks and impacts to Lindéngruppen and its Group companies where relevant as part of their sustainability due diligence efforts
 - Provide regular reporting of sustainability efforts and performance to foster continuous improvement
- Lindéngruppen and its Group companies reserve the right to carry out unannounced inspections of our suppliers’ facilities. Suppliers must allow the people representing Lindéngruppen or its Group companies access to such facilities and necessary data, subject to respecting the protection of confidential business information and in line with applicable national legislation. This includes, but is not limited to, information on geolocation of sites, sub-tiers of suppliers, documentation, worker records, and confidential interviews with workers conducted without the presence of management, to ensure compliance with this Code.

4. Governance and responsibility

The Policy Holder, Lindéngruppen’s Chief Communication and Sustainability Officer, has the ultimate responsibility for the Lindéngruppen Supplier Code of Conduct.

Group companies may either adopt this document or create their own aligned document adapted to their businesses. The respective Group Company Management is responsible for ensuring compliance with the Supplier Code of Conduct or the own aligned Group company document.

This Supplier Code of Conduct should serve as inspiration and guidance also for the partly owned companies and they may adopt this document or create their own Supplier Code of Conduct.

5. Violations of this Supplier Code of Conduct

In the event of any violation of this Code by a supplier or business partner or an actor in a sub-tier of the supply chain, the supplier or business partner must take prompt corrective action regarding any identified non-compliance and notify Lindéngruppen or its Group companies of such incidents.

If no corrective action is taken within an adequate period of time, it shall be considered a material breach of the Code. In such cases, Lindéngruppen and its Group companies reserve the right to terminate the commercial relationship with immediate effect.

Workers at our suppliers and business partners can use our confidential “whistleblowing” e-mail addresses in relation to any violations of this Supplier Code of Conduct. 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. There shall be no retaliation or other negative consequences for persons reporting in good faith.

Contacts

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Supplier's Acknowledgement

Name of Company: _____

Name and Title: _____

Signature/Company Stamp/Seal: _____

Date and Place: _____