

# LINDAB SUPPLIER PRINCIPLES

Lindab has adopted these Supplier Principles (the "Principles") to ensure that Lindab's suppliers conduct its business in a manner that is consistent with all relevant legal requirements and generally accepted norms and high standards of integrity and ethical behaviour.

It is imperative that Lindab maintains the confidence and trust that our stakeholders have placed in Lindab, and all business decisions and actions connected to Lindab should be assessed in light of whether it is right, legal and fair.

These Principles outline the minimum standards Lindab requires its suppliers, and their subcontractors to follow.

### Honest and ethical behaviour

Lindab's suppliers shall act in a responsible manner.

All suppliers are expected to conduct their affairs and dealings with uncompromising honesty and integrity. No supplier of Lindab shall take unfair advantage of anyone through manipulation, concealment, abuse, misrepresentation of material facts or any other unfair dealing or practice. All communications, verbal and written, must be truthful and must not intentionally, directly or indirectly, mislead others.

Corruptive behaviour distorts trade and hampers economic and democratic development. Lindab Group is committed not to engage in any corruption or bribery and reciprocally requires the same from all suppliers. Suppliers are required not to accept any kind of corrupt practices. No supplier or representative of any supplier may give or offer to give, directly or indirectly to any Lindab representative or third party any illicit payment or other consideration or benefit for the purposes to obtain, retain or direct business or to secure other improper advantages. No payments, gifts or other kinds of reimbursement or benefits shall be asked or accepted by supplier or a supplier representative from Lindab or any Lindab representative or third party that could affect or appear to affect the objectivity in decisions.

Similarly, Lindab is firmly committed to fair competition. No suppliers of Lindab shall act contrary to any applicable competition laws. Lindab's suppliers shall not exchange information or enter into understandings with competitors or business partners that improperly influence the markets or fair competition.

### Legal compliance

The Lindab Group operates its business through legal entities in a number of countries and jurisdictions and is represented in many more. Lindab is responsible for understanding and complying with all applicable laws and regulations and requires the same from its suppliers. In the event that the requirements of these Principles are stricter than applicable law, Lindab and Lindab's suppliers shall comply with these Principles. If there is any conflict between these Principles and any applicable laws, the applicable laws shall prevail to the extent they are stricter.

As a company listed on the Nasdaq stock exchange in Stockholm, Lindab is committed to comply with all applicable market abuse regulations. Each individual under the supplier's control and who have access to non-public information that may impact the share price of Lindab may not carry out transactions in Lindab shares or other financial instruments relating to the Lindab share and may not unduly disclose such information.



# **Conflict of interest**

A conflict of interest is a set of circumstances that may constitute a risk that an individual's professional judgement is unduly influenced. Suppliers shall conduct their activities and interests in a manner that will not conflict or risk to be in conflict with business transactions with Lindab.

Suppliers are required to openly and immediately inform Lindab of any transaction or relationship that may create a conflict of interest.

### Protection of corporate assets and confidentiality

The tangible and intangible assets (IPR) of Lindab shall be preserved and protected and shall only be used for business objectives according to the business agreement(s).

Lindab's proprietary and confidential information are valuable assets. All suppliers are required to maintain the confidentiality of information entrusted to them by Lindab or any business partner except when disclosure is authorized or legally mandated.

Any suspected incident of fraud, theft, misuse or unauthorized disclosure of confidential information shall be immediately reported to Lindab for investigation.

# Political involvement

Lindab is neutral in terms of political affiliation and candidates. Neither Lindab's name nor its assets shall be used to promote political parties or candidates.

### Labour conditions

Employment conditions offered to employees of suppliers shall be fair and reasonable and shall meet the requirement of national legislation and core ILO conventions. Lindab encourages diversity.

- Lindab's suppliers shall provide a safe and healthy working environment and shall be committed to continuous improvement to minimize the risk of workplace incidents.
- Lindab's suppliers shall not accept any use of child labour or forced labour or other forms of involuntary labour.
- Lindab's suppliers shall uphold the elimination of discrimination in respect of employment and occupation.
- Lindab's suppliers shall uphold the right to freedom of association and collective bargaining.
- Lindab's suppliers shall provide wages according to local legislation.

#### Environment

Lindab expects suppliers to comply with all applicable environmental laws and regulations and to contribute to global sustainability by a precautionary approach to environmental challenges, by undertaking initiatives to promote greater environmental responsibility and by the development and diffusion of environmentally friendly technologies, to the best of their abilities.



# Privacy

The supplier is required to respect the privacy of customers, employees and third parties and to register, store securely and use such information only for justified purposes and in accordance with applicable laws.

# Human rights

Lindab supports and respects the protection of internationally proclaimed human rights and expect the same from all suppliers. Suppliers shall ensure that they are not complicit in any abuses thereof.

# Accounting and reporting

All transactions shall be reported in accordance with general accepted accounting practices and as stipulated in local laws and regulations. The records shall show the transactions in a transparent, correct and not misleading manner. All reports shall be truthful, relevant, complete and timely. Unrecorded or "off the books" liabilities, funds and assets shall not be maintained unless permitted by applicable laws.

Records and other corporate documentation shall always be retained and destroyed according with applicable laws.

### Money laundering

The supplier shall not accept, facilitate or support money laundering.

#### **Risk management**

All suppliers are required to have and maintain procedures for risk management including business interruption and shortage preventions.

# **Implementation and Breach of Principles**

It is the responsibility of each Supplier to meet the requirements of these Principles and to pass on these requirements in its supply chain.

The Supplier should audit its own operations to ensure compliance with these Principles. Lindab reserves the right to make inspections of facilities and documents relevant for the observance of the requirements of these Principles.

A supplier who violates or is anticipated to violate the Principles may be subject to immediate termination of business agreement and legal action.

These Principles has been adopted by the CEO of Lindab Group on January 29<sup>th</sup> 2020. Revised by the CEO of Lindab Group on April 21<sup>st</sup> 2021.