

# Table of content

Introduction		1
1.	General Requirements	2
	1.1 Compliance with Laws and Regulations	
	1.2 Sustainability Due Diligence	
	1.3 Responsible Sourcing	
	1.4 Monitoring and Follow-up	
2.	Environment	4
3.	Human Rights	5
	3.1 Health and Safety	
	3.2 Labor Practices	
	3.3 Indigenous communities	
4.	<b>Business Conduct</b>	7
	4.1 Business Ethics	
	4.2 Animal Welfare	
5.	Get Help	9
	How to raise a question	
	Acknowledgement	

### Introduction

Lantmännen is an agricultural cooperative owned by Swedish farmers and Northern Europe's leader in agriculture, machinery, bioenergy and food products. Our mission is to make farming thrive. The Lantmännen brand promise, "Together we take responsibility from field to fork", provides the foundation for our shared commitment to customers, consumers, communities and our environment.

Lantmännen supports and respects the Universal Declaration of Human Rights as well as the International Labor Organization ILO's Declaration of Fundamental Rights and Principles at Work and related core conventions<sup>i</sup>, and we expect the same from our Suppliers. We are committed to good business ethics and international goals and frameworks for sustainable development such as the <u>UN Guiding Principles on Business and Human Rights</u>, and the <u>UN Sustainable Development Goals in Agenda 2030</u>.

Our Supplier Code of Conduct has been drawn up to align with the mentioned frameworks as well as the <u>UN Global Compact principles</u> and the <u>OECD Guidelines for Multinational Enterprises</u>.

To ensure sustainable and responsible operations throughout our value chain, this Supplier Code of Conduct outlines the minimum requirements all our suppliers must meet regarding topics applicable to their business. Suppliers must place similar requirements on their own suppliers.

Scope: This Supplier Code of Conduct applies to all Suppliers of products and services to the Lantmännen Group.

"Together we take responsibility from field to fork. As one of the most purposeful companies in Northern Europe we are committed to contributing to a more sustainable future and expect our value chain partners to share our commitment to people, planet and ethical business."

/Magnus Kagevik, Group President & CEO Lantmännen

## 1. General Requirements

## 1.1 Compliance with Laws and Regulations

Suppliers must comply with all laws and regulations applicable to their business.

This includes, but is not limited to, laws and regulations related to human rights, labor, health and safety, environmental protection, anti-corruption, anti-bribery, fair competition, anti-money laundering, trade sanctions, data privacy and business integrity.

#### 1.2 Sustainability Due Diligence

We expect our Suppliers to commit to implement a risk-based sustainability due diligence process to identify, manage and mitigate risks related to human rights, environment and business ethics in accordance with the OECD Due Diligence guidelines for Responsible Business Conduct.

#### 1.3 Responsible Sourcing

Suppliers must ensure that their sourcing practices are responsible and that suppliers' sub-suppliers also adhere to the requirements of this Supplier Code of Conduct. This includes:

Careful selection of suppliers: sourcing goods and services from suppliers who adhere to similar ethical and sustainability practices by following a risk-based due diligence process in supplier pre-screening, selection and to mitigate and monitor identified human rights, environmental risks as well as risks related to anti-bribery, anti-corruption and trade sanctions in the supply chain including primary production when relevant.

- Supply Chain Transparency: providing sufficient transparency about the supply chain and origins of products and ingredients when requested, ensuring risk-based traceability throughout the supply chain.
- Monitoring supply chain: regular risk-based monitoring of supplier's supply chain to ensure adherence to the requirements set out in this Supplier Code of Conduct including third party ethical, social and environmental audits and assessments when needed in accordance with the due diligence process.

#### 1.4 Monitoring and Follow-up

Lantmännen reserves the right to monitor and assess supplier compliance with this Supplier Code of Conduct. This may include self-assessment questionnaires, audits, inspections and review of relevant documentation in relation to this Supplier Code of Conduct or to the business dealings between Lantmännen and the Supplier. Suppliers are expected to cooperate fully and take corrective actions where necessary and to provide Lantmännen with information to evidence traceability, due diligence procedures and/or environmental performance of the Supplier when requested.

Suppliers are expected to maintain a robust grievance procedure to ensure that employees and stakeholders can safely report any concern relating to or violation of these requirements. Suppliers must ensure that these grievance channels are accessible, confidential, and responsive to address concerns promptly and fairly.

Lantmännen collaborates with suppliers to ensure compliance with this Supplier Code of Conduct. If Supplier fails to comply with the terms of this Supplier Code of Conduct and improvements are not made within an agreed period, Lantmännen may, as a last resort, terminate the business relationship. In cases when remediation for those affected is needed, Lantmännen will actively take part in supporting the remediation activities.



### 2. Environment

Aligned with our commitment to reduce our climate emissions in line with the Paris Agreement and climate science, as well as to enhance our positive impact on nature and minimize negative impacts throughout product and service lifecycles, suppliers shall to the extent applicable to their business operations and value chain:

- Reduce greenhouse gas emissions: Implementing practices to measure, manage and reduce greenhouse gas emissions throughout the value chain, with best efforts to align with the needed emissions reductions according to the climate science and work towards climate neutrality by 2050. Actively work for continuous improvement in environmental performance and increase the share of fossil-free energy in the operations.
- Develop climate resilience and adaptation capabilities: Implementing strategies for robust and resilient business operations. This includes assessing climate-related risks and adopting practices based on the outcomes to promote longterm resilience.
- Minimize other emissions and pollution:
   Actively working to reduce emissions and pollutants released into the air, soil, and waterways. Minimize the use of harmful substances in all operations, ensuring safe handling, storage and disposal to protect human health and the environment. The precautionary principle should be applied.

- Promote biodiversity: Implementing practices that promote biodiversity and reduce negative impacts on nature. Conduct business-relevant biodiversity impact assessments to identify potential negative impacts on biodiversity sensitive areas and aim to avoid and minimize negative impacts by restoring or offsetting impacts. Prioritize, manage and track progress on managing biodiversity impacts.
- Prevent deforestation and manage land use change responsibly: Implementing practices to identify deforestation risks in value chain and to prevent deforestation and manage land use change responsibly to minimize environmental impact and protect forests, other wooded lands and natural ecosystems.
- Adopt sustainable farming practices: Supporting and adopting agricultural practices that protect biodiversity, improve soil health and reduce the climate impact of farming.
   This includes, but is not limited to, promoting diverse crop rotation, maximal soil coverage, precision and need-based crop nutrition, protection and water management practices.
- Strive for resource efficiency and circularity: Optimizing the use of resources, including water and energy, and minimize waste generation, including food waste by following the waste hierarchy of avoid, reduce, reuse and recycle. Promote recycling, the use of fossil-free, renewable and recycled resources. Embracing circular principles to extend the lifetime of products where applicable.

## 3. Human Rights<sup>ii</sup>

Suppliers must support and respect internationally declared human rights and treat its employees and all sub-suppliers or subcontractors' workers fairly, equally and with respect.

#### 3.1 Health and Safetyiii

Suppliers must ensure a safe and healthy working environment for all employees and subcontractors working for the company. This includes:

- Workplace Safety: Implementing a systematic approach to manage health and safety risks and to prevent accidents and injuries. Regular training and protective equipment should be provided free of charge for employees.
- Work Environment: Providing clean, sanitary and safe working facilities, including any provided accommodation, which must include access to clean toilet facilities and water, and, if applicable, sanitary facilities for food storage.

Product Safety: Implementing a systematic approach to manage product related safety and quality risks to ensure that all products supplied meet high standards of product safety and quality are free from food fraud by complying with internationally recognized standards.

#### 3.2 Labor Practices

Suppliers must uphold fair labor practices and social conditions supporting workers' rights throughout employment in accordance with the ILO core conventions. This includes:

No child labor<sup>iv</sup>: Not employing children under the age of 15. Only exceptions recognized by the ILO can be accepted. The Supplier commits to ensure that young persons from 15 to 18 years do not work at night and that they are protected against conditions of work which are prejudicial to their health, safety and development.



#### No slavery, forced labor or human

**trafficking**\*: Strictly prohibiting the use of any form of forced or involuntary labor, or any labor linked to any form of punishment or conditional payment of a fee and/or handing over of personal identification documents.

Fair Treatment<sup>vi</sup>: Securing equal treatment and opportunities for all and equal pay for work of equal value. Discrimination, harassment, violence or abuse in the workplace shall not be accepted. Vulnerable persons, such as young workers, new and expecting mothers and persons with disabilities, need special protection.

Freedom of association and the right to collective bargaining<sup>vii</sup>: Respecting employees right to form or join trade unions as well as the right to collective negotiations in accordance with local legislation.

Fair wages viii: Wages and benefits paid for a standard working week must meet, at a minimum, national applicable legal standards and collective agreements. In any event, wages should always be enough to meet basic needs and to provide some discretionary income. All workers shall be provided with written and understandable information about their wages each time that they are paid.

Decent working hours in: Guaranteeing decent working hours for workers by applying the national legislation, industry benchmark standards and collective agreements in accordance with the international framework set out by the ILO, and to promote working hour practices that enable a healthy work-life balance for workers.

**Regular employment provided:** To extent possible work performed must be based on recognized employment relationship established through national law and collective agreements avoiding precarious work and unjustified fixed term or limited hours contracts.

#### 3.3 Indigenous communities

Suppliers shall respect the free, prior and informed consent of indigenous communities prior to the beginning of development on ancestral land or using resources in an indigenous population's territory.



### 4. Business Conduct

#### **4.1 Business Ethics**

Suppliers must conduct business ethically, with integrity and establish and maintain policies, procedures and internal controls to prevent, detect and address unethical business practices, including:

- Anti-corruption\* & anti-bribery: Suppliers shall not engage in any form of bribery, corruption, extortion or embezzlement. Suppliers must not offer, promise, give or accept any form of improper payments, gifts or advantages in dealings with public officials or private sector partners.
- Fair competition: Suppliers shall conduct their business in accordance with fair competition principles and must not engage in any practices that violate competition regulations and laws, such as price-fixing, market allocation, bid-rigging or other anti-competitive practices.
- Anti-money laundering: Suppliers must have appropriate measures in place to prevent and detect money laundering and terrorist financing.

- Trade sanctions: Suppliers must comply
  with all applicable trade sanctions, export
  control laws and embargo regulations
  imposed by relevant authorities and implement appropriate due diligence measures to
  prevent violations of such regulations.
- Conflicts of Interest: Suppliers must disclose any actual or potential conflicts of interest in their business dealings with Lantmännen. Any personal relationships, financial interests or other situations that may create an appearance of impropriety must be reported and managed correctly and with transparency.
- Accounting & Auditing: Suppliers must maintain accurate and transparent records of business activities and comply with all applicable regulatory reporting requirements and generally accepted accounting principles and standards.



#### 4. 2 Animal Welfare

Suppliers of animal-based products shall maintain policies and procedures ensuring and monitoring of animal welfare which encompasses the well-being of the animal (animal health) and the animal's perception of its situation (animal welfare).

**Animal health:** Suppliers shall take preventive actions against animal illness and unhealthy animals shall receive proper and timely treatment.

**Animal welfare:** Animals shall be free from hunger and thirst, discomfort, pain, fear and stress. Animals' freedom to express normal behavior shall be respected. Ill or improper treatment of animals causing fear, stress or pain is not acceptable.



### 5. Get Help

#### How to raise a question

Subject to local laws and any legal restrictions applicable to such reporting, Suppliers are expected to inform Lantmännen promptly of any concern related to this Supplier Code of Conduct, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence.

Prompt reporting is crucial — a question or concern may be raised by a Supplier by discussing with your Lantmännen point of contact or other Lantmännen manager or director.

Note: Suppliers do not need to be certain that a violation has occurred but rather should raise a concern when there is a good faith belief that something improper, a violation of law or policy, has occurred. Lantmännen fully examines every integrity concern raised and takes necessary remedial actions where appropriate.

Lantmännen forbids retaliation against any person reporting such a concern.

#### Acknowledgement

By signing below, we hereby acknowledge receipt of the Lantmännen Supplier Code of Conduct and commit to ensuring that we, as a company, adhere to its principles and requirements.

Lantmännen Supplier Code of Conduct accepted

Company Name:	
Company Representative:	
Position Title:	
Date:	
Signature:	

#### Lantmännen Supplier Code of Conduct ver. 3.0

Approved by Group Board of Directors on 12 June 2025

In the event of any discrepancy or inconsistency between the translated versions of this Supplier Code of Conduct and the original English version, the English version shall prevail in matters of interpretation and shall be deemed the sole binding and authoritative version.

<sup>&</sup>lt;sup>i</sup> References to relevant ILO and United Nations conventions for each area of the code, including web link, are found below

<sup>&</sup>lt;u>ii</u> <u>Universal Declaration of Human Rights</u>

 $<sup>^{\</sup>rm iii}$  ILO Convention No.  $\underline{155},\underline{184}$  and ILO Recommendation No.  $\underline{164}$ 

<sup>&</sup>lt;sup>iv</sup> UN Convention on the Rights of the Child ILO Conventions No. <u>138</u>, <u>182</u>, ILO Recommendation No. <u>146</u> and <u>UNICEF's Children's Rights and Business Principles</u>

 $<sup>^{\</sup>mathrm{v}}$  ILO Conventions No. <u>29</u> and <u>105</u>

 $<sup>^{</sup>m vi}$  ILO Conventions No. 100, 111, 143, 169, 183 and UN Convention on Discrimination Against Women

vii ILO Conventions No. 87, 98, 135 and 154

viii ILO Convention No. 26, 95 and 131

 $<sup>^{\</sup>mathrm{ix}}$  ILO Convention No.  $\underline{1}$  and  $\underline{14},$  ILO Recommendation No. 116

<sup>&</sup>lt;u>×</u> <u>UN Convention Against Corruption</u>