



LYCKEBY GROUP

# Code of Conduct



LYCKEBY GROUP

Enriches life.

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## Message from our Group CEO

At Lyckeby Group, we create opportunities based on what the earth has to offer. Together, in harmony with our surroundings and with each other, we shape the future where our potato starch and flavorings provide unique experiences.

Our Code of Conduct, guides us in understanding and embracing our responsibilities as we navigate the evolving landscape of rules and regulations. It supports us in fulfilling our mission with professionalism, respect, and integrity - values that are deeply appreciated and expected by our partners, customers, and members/owners. These values have earned us trust and respect, and it is up to all of us to protect and build on that foundation every day.

I am confident that each of you will continue to be outstanding ambassadors for our company, upholding the principles and behaviors outlined in our Code of Conduct. Living by these principles means making ethical decisions and taking pride in how we do business.

By building trust and working together, we not only do what's right for our business and our people, but also for the planet and the broader community. I firmly believe that trust, combined with a culture grounded in our values, is a key to driving results in a responsible and ethical way.

**Hans Holmstedt**  
Group CEO - Lyckeby Group



## Our story - Our values

Our journey began in the fertile fields of southern Sweden. Here, we took our first steps under the vast and ever-changing sky. Each crop held hope for the future, and each harvest confirmed both our ambition and our mission: to create opportunities from what the earth has to offer.

Our Code of Conduct reflects the values that shape our identity and guide every decision we make - Commitment, Courage, Care, and Responsibility. These principles are not just words; they are the foundation of how we work, how we treat one another, and how we engage with our customers, partners, and the world around us.

Working in harmony with nature and with each other, we strive to turn nature's gifts into meaningful experiences - moments that unite people, spark joy, and create lasting memories. By embracing one another's strengths and recognizing the power of collaboration, we unlock greater value and contribute to a more sustainable and inspiring future.

This Code of Conduct serves as both a compass and a commitment. It ensures that we uphold the highest ethical standards and remain true to our purpose: to enrich lives - now and for generations to come.

Lyckeby Group - **Enriches life.**

## How our values and culture guide our business practices

### Our values

At Lyckeby Group, our values shape who we are, guide our actions, and build trust with colleagues, customers, and partners.

#### Commitment

We are dedicated to understanding our customers' needs and challenges just as much as we are committed to our own development. We are driven by the recognition of the value our products can provide. We strive for a collaborative approach that is humble and supportive, helping each other succeed at every level, whether it's with major projects or small details.

#### Courage

For us, courage means standing up for each other and daring to speak up when something feels wrong or goes wrong. We are honest, challenge established structures, and continuously seek improvement. Drawing on our expertise and extensive experience, we are confident to make tough decisions and prioritize effectively.

#### Care

We demonstrate care by acknowledging and supporting each other to foster a productive environment where we can flourish and experience a sense of belonging. We aim to cultivate an inclusive culture where the diversity and perspectives are seen as an asset that enhances us, adds excitement and furthers innovation.

#### Responsibility

We act responsibly towards each other, our customers, and our communities. We are committed to fulfilling and following up on our promises and always work proactively with the company's best interests in mind. With care for our environment and the future, we actively work to minimize our climate footprint, from cultivation to the finished product.

### Our culture

Our culture at Lyckeby Group is shaped by how we live our values and interact with each other. It reflects not only what we believe, but how we turn those beliefs into action. Culture is not created by words alone—it is built by people, through shared behaviors, consistent collaboration, and mutual respect.

We are all responsible for maintaining and strengthening our culture. This means making everyday choices that align with our values, supporting one another, and working toward common goals with integrity and openness. We recognize that building the right culture takes time, effort, and continuous reflection. It's a journey we take together.

By staying true to our culture and values, we create an environment where people thrive and meaningful results are achieved. Together, we make the difference—not only for our company, but for our customers, communities, and the future.

### How we do business – Driving success with integrity and responsibility

At Lyckeby Group, enriching people's lives is our promise to ourselves and the world. This commitment shapes our approach to business, guiding us in our pursuit of success. We are driven by our purpose, guided by our values, and empowered by our culture.

Our way of doing business is built on trust, collaboration, and the belief that success must be achieved responsibly, ethically, and sustainably.

Our commitment to responsible, ethical, and sustainable practices is embedded in everything we do—whether as an employer, an employee, partner, or a member of the broader community. It shapes the decisions we make every day, ensuring we meet our business goals while contributing to a fairer, more equal society.

## Divisions of Lyckeby Group:

**Lyckeby (Lyckeby Group ek. för.)**, parent company. Organization number 736200-2102.

**Culinar Sverige AB**, subsidiary. Organization number 556192-5875

**LYCKEBY CULINAR a.s.**, Strakonická 946, 341 01 Horažďovice, the Czech Republic, VAT number CZ26361906

**LYCKEBY AMYLEX, a.s.**, Strakonická 946, 341 01 Horažďovice, the Czech Republic, VAT number CZ49790340

# Lyckeby Group's Code of Conduct - Our guidance and commitment

**Lyckeby Group's Code of Conduct** is based on international standards: the UN Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO and UN Conventions.

Our Code of Conduct summarizes what Lyckeby Group stands for and provides guidelines for how employees, and those representing Lyckeby Group in various contexts, are expected to behave.

The Code of Conduct contains guidelines for the rights, the duties and the responsibilities of Lyckeby Group's employees, among other things in relation to business principles, health, safety, working conditions, respect for human rights, the environment and sustainability. With the purpose of leading to improvements, increased

awareness and commitment among our employees, the Code of Conduct is revised and updated on a regular basis.

All employees are informed about the Code of Conduct upon employment. Furthermore, we offer regular updates in the event of any changes, as well as further training for those whose roles involve interaction with suppliers, customers, and other business partners.

### **Our role in the community**

The operations within Lyckeby Group, which include 550 members in Sweden and 1 member in the Czech Republic with 150 affiliated growers, are grounded in active agriculture with a strong local presence and close relationships within the surrounding areas. We process

cultivated raw materials into high-quality products for industrial and consumer markets. The business employs approximately 370 people in Sweden and 130 in the Czech Republic, with facilities located in smaller urban areas in the countryside.

Lyckeby Group strives to build and maintain trusting, long-term relationships with local communities, authorities, municipalities, local media, and other stakeholders. We are also committed to addressing social conditions in the other markets where we operate. For more details, please refer to our Supplier Code of Conduct.

# How we act – Principles and guidelines

## **Business principles**

### **Laws, rules and regulations**

Our operations as well as our employees shall comply with applicable national and international laws, rules and regulations. Compliance with the law shall be regarded upon as a minimum requirement and our aim is to attain a higher standard.

### **Gifts, benefits, remuneration and representation**

Business and government dealings must be handled ethically. Lyckeby Group rejects every form of corruption, including the giving and taking of bribes and trading in influence. This means that an employee must not accept, request, offer, promise, grant or otherwise promote payments, gifts or other benefits that are intended to influence the recipient's business or government decision in a certain way. Participation in various events must take place in accordance with industry practice, and with moderation and openness, without seeking to influence behaviour.

### **Competition law**

Lyckeby Group's employees must not engage in anti-competitive practices or conduct that prevents, restricts or distorts competition in violation of applicable competition laws, such as price-fixing, market-sharing or similar arrangements. If employees are unsure of what is permissible under competition law, they should always consult with their immediate supervisor.

## **Teamwork and leadership**

Lyckeby Group's employees should be provided with opportunities to participate, develop and take on new challenges. All employees must be treated with respect for their views, knowledge and experience. Lyckeby Group's employees are expected to take responsibility for their own personal development, as well as Lyckeby Group's development as a cohesive Group.

Employees are also expected to contribute to innovative and constructive work practices. Lyckeby Group's success relies on managers translating strategies, objectives and values into action, and behaving in a manner that stimulates and motivates employees. Leadership must be built on mutual trust and a good leader at Lyckeby Group engages, develops and creates involvement. Lyckeby Group attaches great importance to working systematically with leadership development, and identifies, follows and develops leaders at various levels.

## Health and safety

To enable a safe and secure workplace we shall in an active and systematic way work for constant improvements of our work environment. All employees are responsible for their own safety, and the safety of others.

The work environment shall be physically, mentally and socially sound, and provide opportunities for employees to grow and develop. Lyckeby Group's occupational health and wellness initiatives are important contributions to creating a healthy workplace.

## Human rights and working conditions

### Discrimination and harassment

Lyckeby Group supports and respects internationally recognized human rights.

Lyckeby Group promotes diversity and equality. Equal treatment and equal opportunity shall apply to everyone, regardless of ethnicity, nationality, gender, sexual orientation, religion or other belief, political opinion, social origin, disability, age or any other status protected by applicable laws.

Lyckeby Group does not accept any form of mental or physical abuse, threat of abuse, discrimination, bullying, sexual or other forms of harassment.

Lyckeby Group does not accept any form of forced labour including servitude or human trafficking.

### Working conditions

Obligations to employees under national laws and social security system must be respected and followed. Working hours, salary and other remuneration must comply with applicable laws and agreements, and generally accepted industry standards.

### Child labour

Child labour must not occur at Lyckeby Group's facilities, or in activities conducted by Lyckeby Group's business partners. Applicable national and international laws on the legal minimum age for employment must be followed.

### Freedom of association

We shall respect our co-workers right to form or join trade unions and our duty to bargain collectively. The co-workers' representatives must be able to carry out their functions, and discrimination against elected representatives or unionized employees is not accepted.

## Environment and sustainability

Lyckeby Group's operations are based on sustainable cultivation in various parts of the world. We work continuously both locally and globally to favour climate and biodiversity as well as a living countryside.

Lyckeby Group works continuously to improve the operation's resource use efficiency and energy performance and, in particular, to minimize the use of non-renewable resources and energy sources. Air and water emissions and other disruptions are reduced as far as possible within a reasonable framework in terms of technology, benefit and cost.

Lyckeby Group works continuously to minimize the amount of waste generated by the company, and prioritizes materials and energy recycling.

## Compliance and monitoring

Within their area of responsibility, each manager is responsible for ensuring that employees, representatives and business partners are informed about the contents of the Code of Conduct and the requirement for their compliance. Managers at Lyckeby Group must always lead by example. All employees are personally responsible for applying the guidelines to their daily activities.

Violations of Lyckeby Group's Code of Conduct will always be taken seriously and, in addition to legal sanctions, may also result in disciplinary action, including termination. Breaches of the Code of Conduct or suspected irregularities should be reported:

1. To an immediate supervisor, or to another person in a senior position, or to a union representative
2. Via Lyckeby Group's whistle blower function, in the event of serious wrongdoing.



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