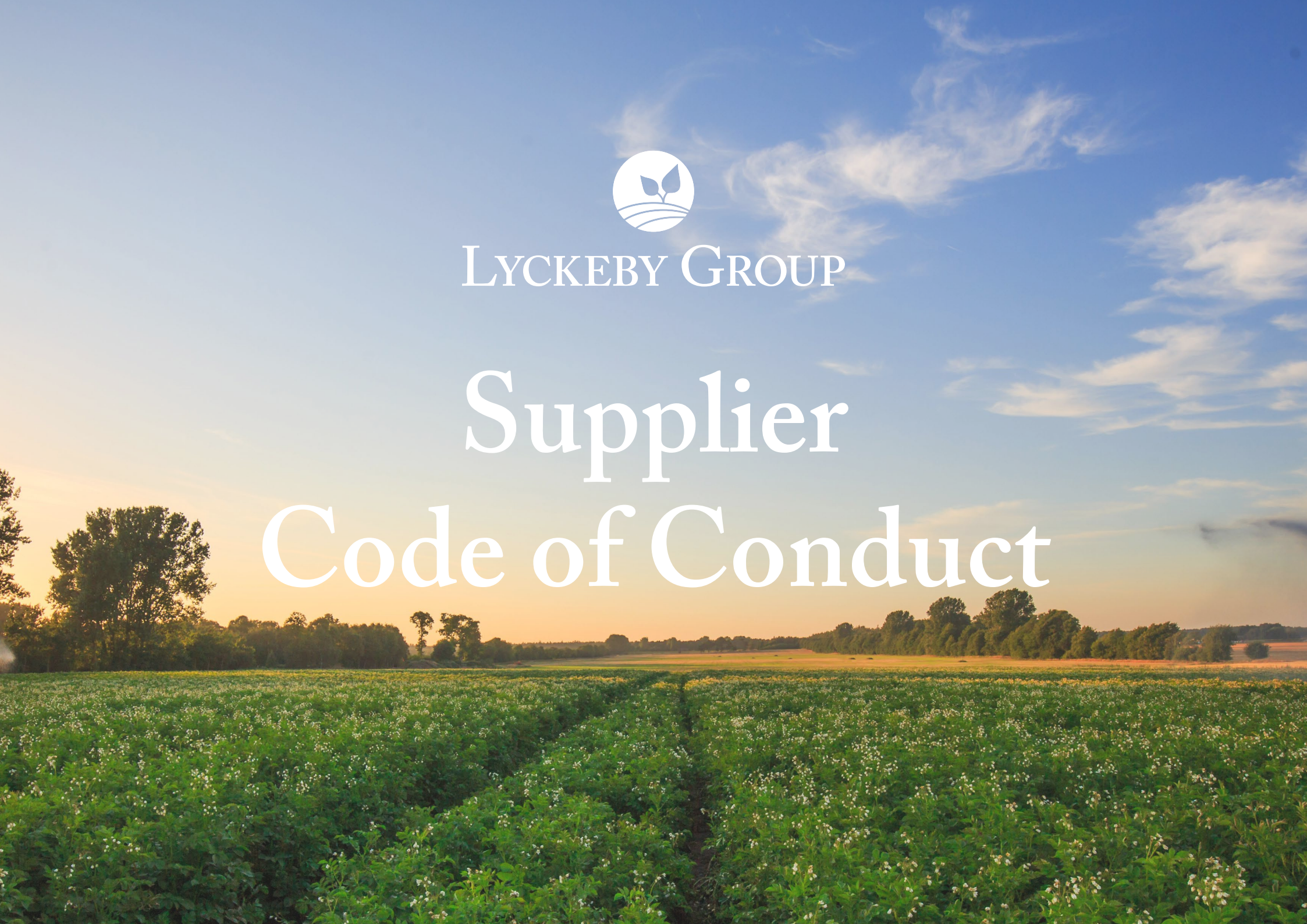

LYCKEBY GROUP

Supplier Code of Conduct

LYCKEBY GROUP

Enriches life.

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Message from the Group CEO

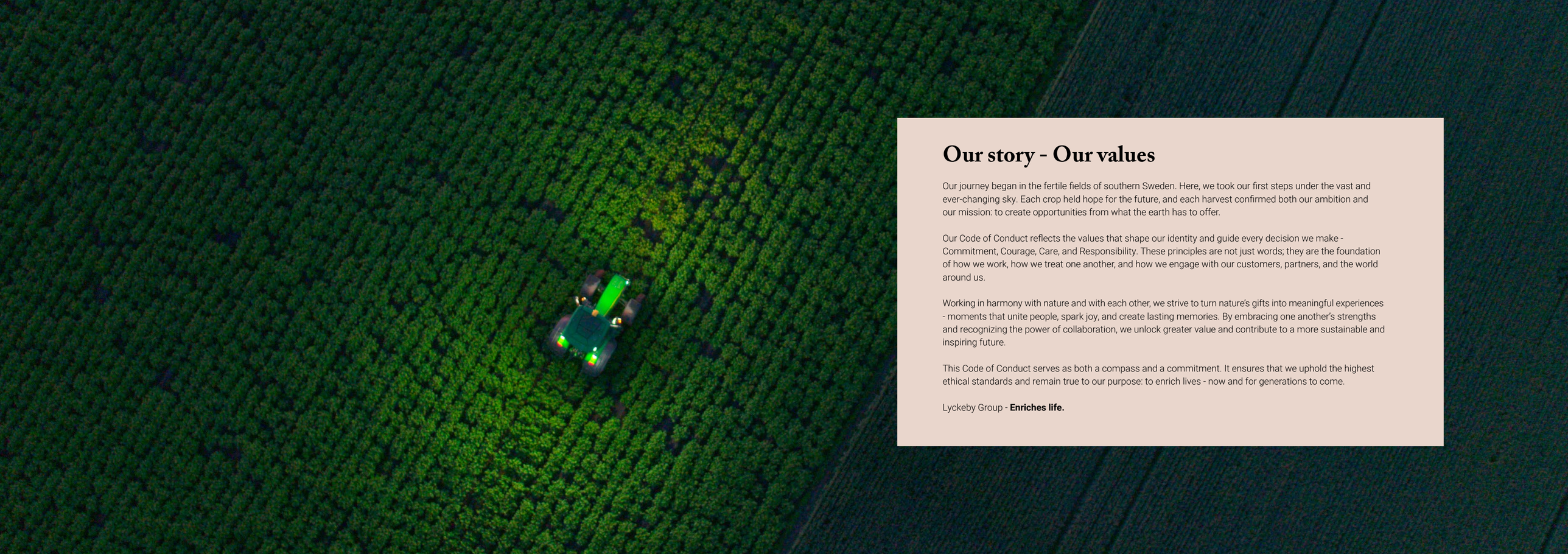
At Lyckeby Group, we create opportunities based on what the earth has to offer. Together, in harmony with our surroundings and with each other, we shape the future where our potato starch and flavorings provide unique experiences.

Achieving this vision requires shared values and a strong commitment to responsible conduct throughout our entire value chain. Our Code of Conduct serves as a guide to help us understand and uphold our responsibilities as we navigate an ever-evolving landscape of laws and regulations. It reflects our core values of professionalism, respect, and integrity—principles we uphold internally and expect our suppliers and business partners to share.

These common principles form the foundation for long-term, trustworthy partnerships. Your adherence to this Code of Conduct is essential to achieving our shared goals in a sustainable, ethical, and transparent manner.

We are confident that you, as our partners, will contribute to strengthening the trust we have built with customers, members, and society at large. By taking responsibility and living up to the principles outlined in this Code of Conduct, you demonstrate a shared commitment to responsible business practices—and your role as an essential part of our mutual success.

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.**

This is a group-wide code of conduct for Lyckeby Group, and the following operations are covered by it.

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

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

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Lyckeby Group's Supplier Code of Conduct - Introduction and scope

The purpose of Lyckeby Group's Supplier Code of Conduct is to clarify our fundamental requirements and expectations of suppliers, as well as to reinforce our commitment to supporting the adherence to and implementation of international conventions within the supply chain. It defines the minimum requirements that every supplier must respect and integrate into their own operations and supply chain.

Our Supplier Code of Conduct is based on the UN Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, the UN Guiding Principles on Business and Human Rights, the UN Global Compact principles, the OECD Guidelines for Multinational Enterprises, and ILO and UN conventions.

Scope
This Code of Conduct applies to all suppliers of goods and services to Lyckeby Group and its subsidiaries, regardless of geographic location. Suppliers are also responsible for ensuring that their own subcontractors comply with these requirements.

Our requirements and expectations for suppliers

Compliance with the law

All our suppliers shall as a minimum requirement comply with national and international legislation in the markets they operate. In case there is a conflict between this Code of Conduct and national legislation, it is recommended that the highest standards shall apply.

Business ethics[3]

All forms of corruption, bribes, money laundering and frauds are prohibited. The supplier shall not, neither directly nor by means of intermediaries, offer gifts, economic or other benefits, with the purpose of obtaining or maintaining a business agreement, unless the gift is of insignificant value. Hospitality, such as meals may be offered if there is a legitimate business purpose involved, and the cost is kept within reasonable limits.

- The supplier shall work for establishing routines that prevent corruption and bribery in its business.

Occupational Health and Safety[v]

The supplier shall provide a safe work environment for all employees according to a risk based approach.
Responsibilities shall be defined and in order to prevent accidents and work-related injuries procedures shall be established.

- Employees shall as a minimum have access to clean potable water, adequate lighting, temperature, noise prevention, ventilation and sanitation, to break rooms that serve their purpose and, if required, to clean and safe facilities for food storage and cooking.
- Adequate and functioning Personal Protective Equipment (PPE) shall be provided, free of charge, where necessary as well as securely equipped workstations.
- Education and training concerning health and safety shall be carried out and documented on a regular basis.
- Accommodation provided by the employer shall be clean, safe, and meet the basic needs. It shall be clearly segregated from production area and the employees shall be able to enter and leave the accommodation freely at any time.

Environment

The supplier shall define its environmental impact by assessing its significant environmental aspects and establish and follow routines aiming to reduce this impact in a systematic way. All Swedish potato cultivation within Lyckeby Group shall be verified in accordance with the Sustainable Agriculture Initiative Platform (SAI) and the Farm Sustainability Assessment (FSA) programme.

- The supplier shall actively work for a reduction of its use of resources and energy, and reduce its emissions into the air, soil and water.
- Supplier should work towards understanding deforestation and water risks and take actions to address those risks.
- The supplier shall ensure the safe handling, storage and disposal of hazardous chemicals and the supplier shall take steps to minimize the use of hazardous chemicals and replace them with other methods where possible.

Social conditions[1]

The supplier shall treat its employees fairly, equally and with respect and support and respect the internationally declared human rights. The supplier shall also inform all employees of their rights and obligations according to relevant legislation and ILO-conventions. These conditions shall apply to all employees irrespective of the form of their contract.

Freedom of association and Collective bargaining[ii]

The supplier shall respect its employees' right to organize themselves in the unions they wish and also their right to collectively negotiate wages and remuneration. In the situation where the right to freedom of association and collective bargaining is restricted by national laws and regulations, Lyckeby Group expect suppliers to allow other forms of democratically elected and effective workers representation.

Working hours and wages[vi, vii]

- Working hours shall comply with national laws or local collective agreements and it is strongly recommended that regular working hours do not exceed 48 hours per week.
- Overtime shall be voluntary and always be compensated at a premium rate and limited unless differently regulated by a collective agreement or by national law. Recommended maximum overtime is 12 hours per week
- In countries where working hours are not regulated by national law, for the sector in question, sufficient periods of rest shall be regulated between employees and employers.
- Wages, benefits and remuneration for overtime shall at least be in accordance with national law and collective agreements and be enough to meet basic needs.

- Details and wage conditions shall be clear and communicated to all employees in a language he/she understands, before the employment may start. A transparent and reliable system for records of working hours and wages shall be in place.
- Wages shall be timely paid.
- Deduction from wages and benefits as a disciplinary measure shall not be permitted.
- No deposit of money or properties as condition for employment may occur
- Recruitment agencies must not charge employees with recruitment fees or any other costs associated with labour provisions.

Forced labouri

- No form of forced labour or labour linked to any form of punishment is permitted.
- Documents related to the employment shall be at the employee´s disposal in a language understandable by the employee, and if needed also verbally explained in a language understandable to the employee. In the work document related to the employment the statutory severance when the employment ends shall be clear.
- The employee shall have the right to leave the workplace after completion of working hours and, if so wished, terminate the employment after a reasonable period of notice.
- No employees may be forced to deposit valuables or identification papers in the hands of his/her employer. Should a deposit of identification papers be demanded by national law shall these be at the employee´s disposal at any time.

Child labour[4, iii]

- Child labour must not occur. Every child shall be protected from economic exploitation or from any work that may be harmful to the child's physical and mental health or have a negative impact on the child's development and education.
- The supplier shall check the age in connection with employment by means of an official document and file the data.
- Young workers under 18 years of age, shall not work at night or in hazardous conditions that may be harmful to their health or development.
- In addition, supplier shall develop a child labour prevention and remediation plan that enables children to attend and complete compulsory education.
- In case of child labour, supplier shall inform and engage Lyckeby Group

Justice and equality[iv]

- Any form of discrimination, on the ground of race, gender, age, religion, caste, national origin, disability, political affiliation, sexual orientation, intimidation, oppression or harassment is forbidden.
- Medical tests, irrelevant for work, are not to be performed.
- Disciplinary measures shall be fair, clear and communicated to all employees in an understandable language.

Indigenous peoples rights

The supplier shall care for indigenous peoples' rights in their operations and activities.

Protection of animals

If applicable to its business, the supplier shall implement procedures to prevent mistreatment of animals including when caught, raised, cared for, transported and processed.

Sustainable supply chain and understanding for sustainability risks

The supplier shall have an understanding for social and environmental risks related to its business and supply chain. Based on risk assessment, appropriate policies and procedures shall be developed.

Implementation

- The supplier shall, within its own operations implement the principles being described in this Code of Conduct, or equal standards.
- These principles should be available for all employees in their local language.
- Routines enabling a systematical monitoring and evaluation of these principles shall be in place.
- A system for communicating this Code of Conduct in the supply chain shall exist.
- When the supplier uses sub-suppliers in connection with a delivery to Lyckeby Group, all the chains shall be traceable concerning the manufacturing and origin of raw material with respect to any delivery to Lyckeby Group. The supplier shall provide the name and location of the sub-suppliers they use upon request from Lyckeby Group.
- Changes concerning the supply chain or country of origin shall be approved by Lyckeby Group.

Monitoring and evaluation of the Code of Conduct

- We evaluate how suppliers meet the requirements of this Code of Conduct by requesting relevant information and data. Audits of supplier and subcontractor are also conducted where assessed as relevant.
- We follow up that our suppliers have their own systems enabling systematic work related to work environment responsibility, environmental responsibility and social conditions.
- We believe that together with our suppliers we can work for the creation of a sustainable supply chain. We are therefore in favor of collaborating in order to meet the requirements being set up in this supplier Code of Conduct.
- If a supplier does not comply with the terms of this Code of Conduct, we may terminate the business cooperation. This is not the case if improvement measures are implemented within an agreed period of time.

References:

1. Universal Declaration on Human Rights
   www.un.org
2. The 10 principals of the UN Global Compact
   www.unglobalcompact.org
3. The OECD Guidelines for Multinational Enterprises
   www.oecd.org
4. UN convention on the Rights of the Child
   www.unicef.org
5. UN guiding principles on Business and Human Rights
   www.unglobalcompact.org

International Labour Organisation (ILO)

www.ilo.org

i. Elimination of all forms of forced and compulsory labour

a. ILO conventions 29 and 105

ii. Freedom of association and the effective recognition of the right to collective bargaining

a. ILO conventions 87 and 98

iii. Effective abolition of child labour

a. ILO conventions 138 and 182

iv. Elimination of discrimination in respect of employment and occupation

a. ILO conventions 100 and 111

v. Occupational Safety and Health Convention

a. ILO convention 155 and recommendation 164

vi. Hours of work (Industry)

a. ILO Convention 1

vii. Minimum Wages fixing

a. ILO convention 26, 95 and 131

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