



Lindab Code of Conduct

How we act
defines who we are

On behalf of the Board of Directors, I would like to emphasise the utmost importance we place on our Code of Conduct. It serves as a guiding framework, endorsed by the Board, ensuring that our organisation operates with integrity, accountability, and ethical standards.

Peter Nilsson
Chairman of the Board



I'm pleased to share Lindab's Code of Conduct, a set of principles that underpins our organisation's values and guide our actions.

At Lindab, we firmly believe in upholding integrity, respect, and ethical behaviour in all aspects of our work. This document outlines the standards we expect each team member to adhere to, fostering a positive work environment and nurturing trust among colleagues, partners, and customers.

As CEO, I am personally committed to embodying these values, and I trust that each of you will embrace them wholeheartedly. Let us continue to cultivate a culture of excellence and integrity as we strive towards our shared vision.

Ola Ringdahl
President & CEO



Introduction

This Code of Conduct defines how we – as a company, as teams and as employees – should act towards each other, our customers, business partners, suppliers, competitors and authorities. And in every other situation where you may represent Lindab.

Understanding and complying with the Code of Conduct is mandatory for everyone working for Lindab Group. It is a personal responsibility to comply.

On our managers we have even higher expectations. To be a role model and to support team members to follow the Code of Conduct are part of their leadership responsibilities.

The Code of Conduct is also referred to as the Code in this document.

Approved and updated in June 2023.

Guiding principles

Lindab is a participant of the UN Global Compact and supports the Ten Principles of the UN Global Compact. This Code and the policies issued hereunder draw on these standards as well as the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Human Rights. These principles are and will continue to be reflected in Lindab's policies, decisions and actions.



Speak up!

If we witness or become aware of situations that violate or might violate the Code, we do not stay quiet. Raise your concern in the way you find most appropriate. It can be to a line manager, an HR representative, the legal department or a senior manager.

Concerns may also be raised anonymously through our whistleblowing service, WhistleB, provided by an external party. You'll find the link and info about the whistleblowing service on the intranet LindNet under the menu called People & Culture. Or you can find it on [lindabgroup.com](https://report.whistleb.com/Lindab) under Governance/Whistleblowing.

Link to WhistleB: [>>](https://report.whistleb.com/Lindab)

Disciplinary actions

When non-compliance with this Code is reported or suspected, we will take measures to investigate it and, if appropriate, remedy the situation.

Those who violate our Code, other policies, directives, guidelines or any laws, will be subject to appropriate disciplinary actions, which may include termination of employment.

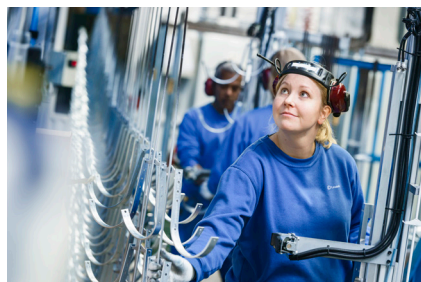
If any of our partners or suppliers violates the Code, we consider this to be a reason for terminating our business relationship.

Our values



Customer success

We believe that customers' success drives our success. This is realised by leading the development of solutions in our core segments.



Down to earth

We strive for long-lasting relations built on an uncomplicated, humble and trustworthy approach. Efficient and fast decision-making is an important part of this.



Neatness and order

Neatness and order throughout impacts efficiency, as well as the company's general image and contributes to a sense of pride among employees.

Content

At work

We provide an open, inclusive and respectful workplace based on fair and responsible practices.

In the market

We uphold ethical business practices and build relationships based upon honesty and integrity.

In society

We value our position as a trusted corporate citizen in all communities in which we operate.

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AT WORK

Lindab is a workplace where you can expect fair working conditions and equal opportunities in a non-discriminating environment.

Read more:

[Equal Opportunities Policy](#)
[Remuneration Policy](#)

Fair working conditions

We engage in fair workplace practices and expect everyone to be treated with dignity and respect. We value inclusion and encourage each other to contribute and speak openly.

We do not accept any form of intimidating or disrespectful behaviour, bullying, harassment, sexual advances or discrimination.

For you this means:

- You will be treated with respect and will not be subjected to physical, verbal or financial punishment.
- You are to demonstrate good judgement in your interaction with your colleagues, our customers, suppliers and other external stakeholders. This entails, for example, not displaying an attitude, a language or behaviour that can be perceived as offensive, sexist or exclusionary.

Freedom of association

The freedom of association and the right to belong to a union, like the right to collective bargaining agreements, are respected within all parts of Lindab. We also respect any employee's choice to refrain from joining a union.

For you this means:

- You have the right to appoint worker representatives and form workers' associations or join trade unions of your own choosing.
- Your decision on whether or not to join a trade union or form workers' associations or appoint worker representatives is an individual choice; you will be respected regardless of which decision you make.

Equal opportunities and non-discrimination

Our view of diversity and equality is based on the understanding that people's differences contribute to an attractive and dynamic workplace.

We recruit, select, evaluate and promote employees based on objective criteria without regard to gender, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age, disability or other categories protected by applicable law.

For you this means:

- You always encourage a positive work environment, where everyone is appreciated, respected and valued for their differences and you stimulate a culture of inclusion.
- If you discover another employee is victimising, harassing or discriminating against a colleague or external contact, you are responsible for acting.
- Managers base employment decisions on objective criteria and qualifications, such as education, prior experience and merit.
- Managers should communicate clearly and openly the reasons for any change affecting an employee's role or terms of employment.



Safe and healthy work environment

We are all entitled to a safe and healthy workplace that provides a sustainable work environment for all our employees.

We have a zero vision for work-related accidents, meaning no one should be injured or harmed while at work. To achieve this goal, we must prevent, mitigate and address safety and health-related risks and promote the well-being of our employees.

Each manager is responsible for ensuring that active health and safety work is conducted. All employees have a health and safety responsibility, which involves following safety regulations and reporting risks and incidents in the work environment to their immediate manager.

For you this means:

- Take the time to understand the health and safety risks present in your daily work as well as the actions you can take to prevent them.
- Stop work and immediately report any issue to your manager/supervisor if you believe a task may cause an injury or illness to you or your colleagues.
- Promote a safety culture by questioning any activity that appears unsafe or harmful.
- Talk to your manager or the health and safety team whenever you are unsure of how to act.
- Never disregard safety devices on machines or the need for personal safety equipment.
- Promptly report any accidents and work-related injuries and illnesses to your manager.
- Respect each other's right to free time after the end of the working day. Help each other to combine work, leisure time and family life.

AT WORK

Lindab should be a safe and healthy workplace free from alcohol and drugs.

Read more:

Occupational Health and Safety Policy

Drugs and alcohol

An alcohol and drug-free workplace is necessary for our employees' security, work climate, health and safety.

No employees may use or abuse drugs and/or other substances that could impair their motor skills, good judgment, or any other functions necessary to perform their work or that might compromise safety.

This applies to both legal and illegal substances. If you need to take a medicine prescribed by your healthcare provider that might cause drowsiness or other impairments, talk to your manager immediately.

For you this means:

- For your own safety and that of others, never engage in work-related activities under the influence of alcohol, drugs or while using medication that could impact your or others' safety.
- Help ensure that those you work with, including contractors and visitors, are familiar with relevant safety procedures.



Company assets

Assets can be tangible or intangible. Examples of tangible assets are real estate, raw materials, products, machines or personal equipment, including our computers and other mobile devices that store important and confidential company information and personal data of our employees and stakeholders. Examples of intangible assets are brands, patents, trademarks, know-how, trade secrets, copyrights, goodwill and information.

It is our responsibility to protect and use such assets with care and sound judgment to ensure they are not lost, stolen, misused or wasted. The same applies when we handle assets belonging to customers or business partners.

We never use company assets for personal gain or for illegal activities. We only use assets for business purposes unless otherwise authorised by appropriate management or stated in Lindab's policies/directives.

For you this means:

- Use appropriate means to safeguard our company's assets from loss, theft, damage and/or misuse.
- Never use company assets and equipment, such as computers and mobile phones, to view materials that are inappropriate, illegal, sexually explicit, or otherwise offensive.
- Make sure that any images or materials you obtain from the internet or a third party are used lawfully.
- Don't share Lindab's proprietary information with any third party without proper approval, and secure the necessary confidentiality agreements.

AT WORK

At Lindab we protect our assets. We strive for neatness and order in our reporting to convey a true picture of our company.

Read more:
[IPR Policy](#)

Accurate and complete records

We strive to report in a transparent, truthful, and timely manner in order to convey a correct picture of Lindab, our operations and performance. This applies to financial as well as non-financial information, such as sustainability data.

All our business and financial records must be accurate, and transactions must be reported in a non-misleading manner in accordance with Lindab's accounting and reporting practices.

For you this means:

- Make sure you properly record all business transactions. All reports or records should be accurate and not false or misleading.



Information security

Information is one of our most valuable assets and, as such, we must safeguard it and treat it with care. Confidential information is any information that is not public, such as Lindab's trade secrets, business and marketing plans, product development information, inventions, manufacturing methods, employee information, and financial information.

We keep confidential information within Lindab at all times, but openly share non-confidential information, best practices and feedback throughout the whole organization to promote engagement and transparency.

For you this means:

- Use caution when discussing company business or when working with company information in a public space.
- Be cautious with links and attachments in unusual e-mails or in e-mails from senders you are not familiar with.
- Learn to recognise and avoid phishing attacks.
- Use complex passwords and multi-factor authentication.
- Be careful when using online tools, such as translation services and AI tools, so you don't share any confidential or business-critical information.

Privacy

We respect the privacy of all individuals and do not collect and store personal information without good reason, comply with all relevant data protection laws and regulations and ensure that all personal information is handled appropriately.

For you this means:

- Make sure you only process personal data with appropriate consent or agreement.
- Only use the minimum amount of personal data necessary to fulfil your legitimate business purpose or legal requirement.

AT WORK

At Lindab we safeguard and protect our confidential information. We are cautious when communicating online and respect the privacy of all individuals.

Read more:

[IS/IT and Data Protection Policy](#)



IN THE MARKET

Lindab believes in fair competition where we give no improper advantages and respect trade sanctions and restrictions.

Read more:
Antitrust Policy

Fair competition

We believe that free competition is in the best interest of our company, our shareholders, our customers, our employees, and society at large, as it drives efficiency and innovation, which are the basis of a well-functioning market economy.

While Lindab will always compete for business, we must do so fairly and in compliance with competition laws (also called “antitrust” laws). These laws generally prohibit agreements or understandings between competitors that limit competition, including price fixing, allocation of customers or geographic markets, bid rigging or abuse of a dominant position.

For you this means:

- Don't propose or enter into agreements or understandings – whether expressed or implied, written or oral – with any competitor that deals with such commercially sensitive matters as product pricing, bids, terms and conditions of sale or sales territories.
- Exercise caution in activities involving competitors and consult with a member of the Lindab legal team before any interactions with competitors.
- Only collect competitive intelligence through publicly available information.

Trade sanctions and restrictions

Customs and export control laws and regulations determine the requirements for importing and exporting both physical goods and non-physical goods (e.g. software and technology). These rules must be followed to ensure responsible and legal international trade.

For you this means:

- You have a responsibility to understand the trade compliance requirements and regulations related to the daily work in your country.

Conflicts of interest

No Lindab employee should give or appear to give improper advantages to any individual, entity or organisation on behalf of Lindab. In addition, employees may not use their positions at Lindab for inappropriate personal gain either for themselves or for family members, friends or other associates. If a personal financial interest could call into question your impartiality or integrity, immediately disclose the situation or relation to your manager.

For you this means:

- Always keep your relationships with business partners professional.
- Don't involve or give favourable treatment to family or friends.
- Avoid any investment, interest or activity that could cause others to doubt your objectivity or loyalty to Lindab.
- Avoid direct or indirect reporting relationships between individuals who are related or intimately involved.
- Promptly report potential conflicts of interest to your manager as soon as you become aware of them.



Products and quality

Maintaining a high quality of our products and a good level of service for our customers is crucial for Lindab's continued positive development. We fulfil our promises and are a reliable partner to our customers. We comply with applicable legislation, agreements and internal rules and processes.

For you this means:

- Everyone should consider quality, sustainability and customer satisfaction as their responsibility.
- Act if you discover unclear requirements, suspected deficiencies or non-conforming products or services.
- Continuously strive to meet or exceed requirements and improve your way of working.
- Listen to our customers (both internal and external) and understand their needs and challenges before agreeing on requirements.
- Actively support new technology and product development, thereby enabling continuous improvement.

IN THE MARKET

Lindab's products should always be of high quality. We are careful when selecting suppliers and continuously evaluate if they follow Lindab's Supplier Principles.

Read more:

Quality and Environment Policy
Lindab Supplier Principles

Sourcing

Excellent business partnerships are part of what makes our company successful. It's vital that we choose wisely from the start, selecting those partners who strive for high business ethics. Our selection process should be thorough, unbiased, and transparent. By sourcing responsibly, we build sustainable relationships with our suppliers, vendors and contractors.

We reserve the right to refuse or end business relationships with partners that do not follow Lindab's Supplier Principles.

For you this means:

- If you work with sourcing, you have the responsibility to ensure that compliance with the Lindab Supplier Principles and Lindab's supplier certification process is always part of the agreement with suppliers.
- If you are aware of any non-compliance with Lindab Supplier Principles, contact the sourcing organisation.



Sales and marketing

Sales and marketing is about increasing engagement for our company. All employees are part of building our brand, internally and externally.

We advertise, promote and label our products and services responsibly, by respecting applicable product regulations and marketing laws as well as relevant industry codes and standards.

Lindab has officially designated spokespersons to communicate publicly on behalf of our company in order to ensure professional, consistent and legally compliant responses to requests from the media, analysts and investors.

Employees are welcome to share non-confidential information about their jobs on private social media accounts in a way that promotes Lindab, our products and our reputation. But we never express personal opinions on social media in a way that can be mistaken to represent the company's opinion.

For you this means:

- Act and talk in a way that reflects the Code and our core values, and that builds trust for our brand at all times.
- Keep our customers and other external stakeholders, as well as internal stakeholders, well-informed in a timely manner, assisting them in understanding our business developments.
- Only discuss confidential information with those who are authorised to have access to such information.
- Share non-confidential information, best practices and feedback to promote engagement and transparency.
- Only speak to the media, analysts or investors, or engage in social media on behalf of our company if you have authorisation to do so.

- Act with care and integrity and use good judgment when using social media privately and in all your communication.
- Make sure to maintain a clear distinction between you and the company when you communicate about Lindab and you make sure your content is consistent with how you wish to present yourself to colleagues and customers, and that it is consistent with our Code.
- Don't use your company email address for private communication.
- Refer all inquiries from analysts or investors to Lindab's Corporate Communications team.
- Refer inquiries from media to your local marketing team or to Lindab's Corporate Communications team.
- Avoid rumours and be cautious with unconfirmed information.

IN THE MARKET

Lindab's brand is one of our greatest assets. We protect it by acting in a way that builds trust and is in line with the Code of Conduct.

Read more:

Communication Policy
Insider Policy



Insider information

Inside information is non-public information that could reasonably be expected to have an effect on the price on Lindab's share price.

We are committed to complying with all applicable insider rules and regulations. We must never disclose inside information to third parties, including family and friends. Employees who possess inside information may not sell or buy Lindab shares or advise anyone else to do so based on such information.

For you this means:

- Only discuss insider information with those who are authorised to have access to such information.
- Never trade in financial instruments or share insider information when you are registered on Lindab insider list, for example during the period immediately prior to the publication of the company's financial reports.
- Avoid trading with Lindab shares if you are aware of information that might influence the share price, for example if you are part of negotiations of a large customer deal, even if you are not registered on an insider list. Consult Lindab's legal team if you are uncertain.
- Use caution when discussing company business or when working with company information in a public space to avoid information leakage.

IN THE MARKET

Lindab is careful with inside information and is committed to follow all applicable rules and regulations.

Read more:

Communication Policy
Insider Policy



Human rights and children's rights

We respect, and seek to protect, the human rights of every person involved in our operations and value chain.

We do not tolerate any forms of modern slavery, such as forced labour, bonded labour or human trafficking. We do not accept child labour or other forms of exploitation of children in our operation or value chain.

For you this means:

- Take suspected or actual abuse of human rights seriously and ensure your concern is addressed promptly by your manager.
- Whenever you use labour agencies or contractors, make sure that workers have legal permits to work and that the agency follows all applicable labour standards, including those related to compensations and benefits.
- If you are aware of any non-compliance with Lindab Supplier Principles, contact the sourcing organisation.

IN SOCIETY

Lindab seeks to protect the human rights of every person involved in our business. We do not tolerate any bribery or improper advantages in our operations.

Read more:
[Anti-Corruption Policy](#)

Bribery and corruption

We are committed to combatting corruption in all forms and do not tolerate bribery or improper advantages in our business. This means that we do not offer, accept, request or authorise gifts, payments or other advantages that could affect or appear to affect the objectivity of a business decision.

All business entertainment is to be moderate in nature and characterised by good judgment so that the parties retain full credibility and an independent position in relation to each other. We do not give or accept anything that could lead to a conflict of interest or raise questions about our integrity.

No employees are permitted, through their position or role in the business, to demand, accept or make a personal gain in the form of gifts, offers or goods from a supplier.

For you this means:

- Never accept anything from a supplier, business partner or anyone else if it could impact, or be perceived as impacting, your ability to be objective when business decisions are to be made.
- Gifts and participation in events that have more than a symbolic value are not to be accepted or provided without the approval of your manager.
- Lunches and dinners with a relevant and clearly stated business purpose are acceptable. The scope must be reasonable and appropriate – in terms of both value and frequency.
- Always seek approval from your manager if you are to engage in a social activity with an authority or public organisation as there are legal restrictions on country level for those types of organisations.
- If you are unsure, contact your manager or Lindab's legal team.



Environmental impact

Environmental responsibility means operating our business and providing products and services in a way that minimises environmental impact and contributes to a more sustainable future.

We should evaluate our environmental impact across the entire life cycle of our products, from the responsible sourcing of raw materials to resource-efficient production and development, as well as optimised waste management.

We set long-term environmental ambitions and targets and actively work to improve our year-on-year environmental performance in our own operations, in our offerings to the market and do our utmost to influence the performance of our suppliers.

For you this means:

- Go about your daily work in an environmentally conscious way. Ensure that your activities at work allow for efficient use of resources and reduction in all kinds of waste and polluting emissions.
- Follow our procedures and local regulations and ensure that Lindab's management and disposal of waste, chemicals or other hazardous materials are carried out in an environmentally safe way.
- Report, and investigate environmental incidents, near misses and hazards and share relevant information that may help others prevent a similar incident.
- Consider the environmental impacts of your business travel when planning your trip.

IN SOCIETY

Lindab wants to contribute to a better climate and strives to decrease our environmental impact. We want to give back to the communities where we do business.

Read more:

Quality and Environment Policy
Communication Policy

Community engagement

We believe that our long-term success is tied to the development of healthy and thriving communities. We encourage community investment activities that support our strategy, vision and core values and that are of mutual benefit to our company and society.

Community investments are an essential factor in helping us recruit, retain, engage and develop our people, and also enhance the reputation of our company as a good corporate citizen.

We do not make contributions, directly or indirectly, to any candidate for public office, political parties, or other political organisations except through industry organisations.

For you this means:

- When you participate in community volunteer activities on behalf of the company, you make sure they are in line with global and local company policies.
- Make sure you follow our procedure for community relations and sponsorship and obtain the appropriate authorisation before making donations to a community organisation in Lindab's name.
- Exercise due care when selecting a sponsor or donation recipient and verify that funding was used as expected.