

### LETTER FROM THE CEO

Dear partner,

Let me start by thanking and congratulating you for joining us on our mission to launch Lynk & Co in Europe.

When we started our journey, our ambition wasn't just to do better what others were already doing but to do something entirely different. This is because not only do we think differentiation is a key ingredient to success, but more importantly because we sincerely believe there are plenty of consumers out there who want something else.

As much as we take pride in and dedicate extreme attention to the 'what', I would like to say that the 'how' is equally as important to Lynk & Co. Our brand offers outstanding products and services, but it is our culture and values that make us who we are; they are also what will dictate how we are perceived by our consumers.

Uncompromising quality is a given but a focus on sustainability in everything that we do is a must. In order to achieve this, it is imperative that we apply this focus in everything wedo, including the selection of our partners.

Keeping these in mind, this document lays out what these values are and how we expect you to respect and adhere to them.

We thank you once again in joining us on this journey and we look forward to your sustainable contribution.

Many thanks,

Alain Visser

CEO

Lynk & Co International AB

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### **PURPOSE**

This Code of Conduct comprises Lynk & Co International AB's (Lynk & Co) requirements and guiding principles for business partners in the area of compliance with applicable laws and regulations towards basic working conditions, human rights, caring for the environment and business integrity.

A business partner is anyone that Lynk & Co does business with, such as suppliers of goods and/or services to Lynk & Co and companies or people who conduct business representing the brand.

#### **BASIC PRINCIPLES**

This Code of Conduct is based on universally proclaimed human rights, including the International Bill of Human Rights, the eight core conventions of the International Labor Organization, and Article 32 of the UN Convent on the rights of the Child.

Furthermore, Lynk & Co supports the United Nations Global Compact; an initiative for businesses that are committed to being fair by following the ten principles regarding human rights, labor, environment and anti-corruption.

### **EXPECTATION OF BUSINESS PARTNERS**

Lynk & Co is committed to conducting responsible business and insist on business partners abiding by the Code of Conduct. Furthermore, business partners must ensure that their employees and subcontractors also respect it.

Lynk & Co expects all associates to demonstrate integrity, responsibility and trust meaning to always comply with this Code of Conduct or similar principles, with all applicable laws and regulations and with your contractual obligations to Lynk & Co. The stricter regulation shall always apply if a topic is covered by this Code of Conduct as well as by applicable laws and/oryour contract with Lynk & Co.

We expect business partners to meet all the following basic requirements, and for them to be managed professionally and systematically.

### **BASIC WORKING CONDITIONS & HUMAN RIGHTS**

Lynk & Co strongly believes that employees are a company's most valuable resource and must always be treated with respect. This is why we insist that business partners work in line with internationally proclaimed principles on human rights.

#### **CHILD LABOR**

Business partners shall work to prevent all forms of child labor. Under no circumstances should employment be offered to a person younger than 15 years of age (or 14 where the national law so allows) or younger than the countries legal minimum age, if higher than 15.

#### TERMS OF EMPLOYMENT

Business partners must guarantee that the working conditions for their employees comply with all applicable legal requirements. In addition, each employee should have the right to get written information, in a language that they can easily understand, specifying their terms of employment.

#### WORKINGHOURS

Working hours including but not limited to overtime, and requirements for providing rest periods, for business partner employees must always comply with applicable law. Lynk & Co supports the requirements of the International Labor Organization (ILO) and encourage business partners to adhere to and respect the relevant ILO standards on working time.

#### **HEALTH & SAFETY**

Safety should always be one of the most important factors in any decision, which is why Lynk & Co expects business partners to provide and maintain a safe and healthy working environment that at least meets, but preferably exceeds, applicable standards and legal requirements.

### **BASIC WORKING CONDITIONS & HUMAN RIGHTS**

#### FORCEDLABOR

There can be no forced labor of any kind relating to Lynk & Co's products and services. Therefore, in no event may business partners use forced labor, regardless of its form. Forced labor includes debt bondage, trafficking and other forms of modern slavery. For more information, please see Lynk & Co International AB's Human Rights Statement.

#### **WAGES & BENEFITS**

Business partners may not pay their employees wages and benefits less than is required by applicable law or collective labor agreement, where applicable. Information about wages and benefits must be available to all employees, in accordance with applicable laws.

#### **FREEDOMOFASSOCIATION**

Business partners shall respect the rights of their employees to lawfully form, join or exclude themselves from employer-employee relationship associations and collective bargaining, where permissible by local law. Lynk & Co encourages business partners to ensure that employees are given the opportunity to discuss their working conditions with management, without fear of reprisal, intimidation or harassment.

#### NON-DISCRIMINATION & EQUAL OPPORTUNITIES

Business partners may not engage in any form of discrimination based on gender, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background and/or other characteristics. Business partners are expected to treat their employees with respect, dignity and common courtesy.

## CARING FOR THE ENVIRONMENT

Lynk & Co expects business partners to constantly strive towards reducing the environmental impact of their operations. We also expect business partners to apply the Precautionary Principle, which means that precautions should be taken whenever there is a reason to believe that a particular action could have negative impact on an individual's health, on society in general or on the environment. Business partners must ensure that they comply with all applicable environmental requirements stipulated by laws, rules and regulations.

### **BUSINESS INTEGRITY**

Lynk & Co expects business partners to conduct their business ethically and with the utmost integrity.

#### **ANTI-CORRUPTION**

No business partners, their employees or their subcontractors may ever engage in, or tolerate, any form of bribery or corruption. As a Lynk & Co business partner, you may neither offer nor accept any form of improper benefit to/from a third party including Lynk & Co, whether public or private, with the purpose of obtaining or retaining business or in order to gain preferential treatment. Such improper benefits may include, but not limited to, monetary gifts, monetary loans, pleasure trips or vacations, luxury goods, concealed commissions, facilitation payments or kickbacks.

Lynk & Co also expects business partners to ensure that all of their reports, records and invoices are accurate and complete, and contain no false or misleading information.

#### **CONFLICT OF INTEREST**

Lynk & Co expects business partners to disclose to us whenever a situation arises in which there appears to be a conflict of interest involving or affecting Lynk & Co. In a similar manner, it is expected from any employee or other representative of Lynk & Co to disclose to us if they have any involvement in, or financial ties with, any business partner.

#### **EXPORT CONTROL**

Lynk & Co is committed to fully comply with applicable export control laws and regulations and we expect business partners to do the same.

### **BUSINESS INTEGRITY**

#### **FAIR COMPETITION**

Business partners must support fair business and fully comply with all applicable fair trade, advertising, competition and antitrust laws.

Lynk & Co expects business partners to compete fairly and to never enter into any understanding or agreements that hinder competition. Moreover, this means that as a business partner you should not undertake in any way with any competitor to fix prices, discounts or terms of sale, and/or divide markets, market shares, customers or territories.

Lynk & Co also expects business partners to not competitively exchange confidential or sensitive information, even if made via third parties. Sensitive information include things like prices, timing of price changes, magnitude of price changes, costs, profit margins, sales forecasts, sales plans, sales territories, distribution practices, terms offered to particular customers, capacity utilization and intentions, competitive bidding plans or strategy, pricing and marketing strategies, product plans and market shares. This also applies when participating in fairs or trade association meetings.

#### PROTECTINGINFORMATION & INTELECTUAL PROPERTY

Business partners must respect intellectual property rights and protect confidential information by safeguarding it against misuse, theft, fraud or improper disclosure.

### CONSEQUENCES OF VIOLATION

Lynk & Co reserves the right to conduct audits, at any time, of business partners that provide goods or services to Lynk & Co. Advance written notice will be provided. If requested, business partners are obligated to provide all relevant information and/or allow Lynk & Co or representatives access to their premises for the purpose of the audit. Lynk & Co also reserves the right to appoint an independent third party of our choosing to conduct audits and ensure that business partners are following this Code of Conduct.

Lack of cooperation and/or violation of the Code of Conduct and/or applicable laws may result in a reduction in business with that partner and, ultimately, an end to the business relationship with Lynk & Co.

#### WHISTLEBLOWING

At Lynk & Co it is encouraged that business partners ask questions and raise concerns in the event of an ethical issue or suspected case of non-compliance. These concerns will be treated with the gravity they deserve and will be properly investigated. If you wish to report a violation of the Code of Conduct, please submit a report through <a href="wb.2secure.se">wb.2secure.se</a> and use code NLG748. Here your anonymity is guaranteed. Or let us know by sending an e-mail to: whistleblowing@lynkco.com.

# **CONTACT**

| Visit us at lynkco.com or contact us at hello@lynkco.com. |  |
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