

# CODE OF CONDUCT

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LYNK&CO

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## FOREWORD – MESSAGE FROM OUR CEO

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Lynk & Co is an international group that openly promotes and stands for equality, diversity, inclusion and multiculturalism. We welcome the most amazing and talented people from all around the world. Each of you carries a unique heritage that makes this company so proud and wealthy. This compels us to foster and honor that heritage, your unique coolness, your swag.

To foster, to empower, to set creativity free, to enable talent to grow, to champion initiative-taking and to encourage efficient work that's what we want to do all day, every day. Always adhere to honesty, trustworthiness and compliance management, strive to cultivate a high-standard corporate culture that conforms to international practices and business ethics. To help you navigate between the right and wrong and challenges you meet every day we have put together a document, the Code of Conduct. I hope you will follow this code in your daily work, please read it carefully.

Our diversity is our strength, our way forward, and one of the reasons why we remain innovative. I am proud to be one of you.

Mr An

## PURPOSE

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Lynk & Co<sup>1</sup> is a joint venture ultimately owned by Geely Holding group, Geely Auto group and Volvo Cars groups. All three companies are reputable companies with high ethical standards and this Code of Conduct (or the “Code”) is designed with reference to both Geely Holding group and Volvo Cars’ Codes of Conduct.

As a main principle, Lynk & Co shall comply with all applicable laws and regulations in all the countries in which we operate. Beyond compliance with applicable laws and regulations, the Code demonstrates Lynk & Co’s commitment to ethical conduct: it sets out the principles that must guide our day-to-day operations. Adherence to the Code of Conduct is our way of ensuring that we conduct our business in an ethical and compliant way, without compromising at any time.

## WHO DOES THE CODE APPLY TO?

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Our Code describes the commitments and principles that apply to Lynk & Co. Everyone working for Lynk & Co must follow these commitments and principles; this includes:

- members of the Lynk & Co Board of Directors.
- all Lynk & Co employees, regardless of function, position or location, whether working full-time or part-time, under a permanent contract or on a temporary basis, as well as
- consultants and agency personnel who work at Lynk & Co premises or under the direction of Lynk & Co. Note that this Code shall not be construed as an employment contract and does not give consultants or agency personnel any right to continued employment by Lynk & Co.

The commitments and principles set out in this Code rest on internationally accepted conventions on human rights and labor rights as well as international guidelines for multinational companies. They must be followed when they state a standard higher than that required by national laws and local regulations.

<sup>1</sup> **Lynk & Co** or the **Group** refers to LYNK & CO Investment Co., Ltd and all legal entities controlled directly or indirectly by LYNK & CO Investment Co., Ltd.

## SPEAK UP!

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Lynk & Co encourages a culture of openness where employees can speak up. Each employee is expected to support Lynk & Co's Code of Conduct & Policies.

As an employee, if you witness behavior that gives you cause for concern or that may represent a breach of this Code, you should raise the issue immediately. Doing so will enable Lynk & Co to promptly address the issue. Violations of this Code can impact all of us, not just those involved in the behavior, which is why speaking up is important.

You should initially and promptly discuss any concern with your Manager or your local HR representative. In most cases, this should satisfactorily address the concern. If, for some reason, you are not comfortable with this, you may also contact the Compliance officer at the Legal Department (both personally or through [whistleblowing@lynkco.com](mailto:whistleblowing@lynkco.com)). Lynk & Co also offers online reporting through [wb.2secure.se](https://wb.2secure.se). Please use code NLG748 when registering your report.

For more information on the above reporting lines, please refer to the Internal Reporting section, page 41.

At Lynk & Co, we are committed to protecting individuals who make a report or participate in an investigation in good faith. "Good faith" means that you honestly provide all the information you have when making a report or participating in an investigation.

Retaliation, harassment, and reprisals of any kind are not tolerated at Lynk & Co. If you know or suspect that retaliation has occurred or is occurring, you may report the situation to an HR Department, or raise the concern to the Compliance/Legal Department or via the relevant reporting line.

# EMPLOYEE OBLIGATIONS

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## INTEGRITY AND COMPLIANCE

Employees are required to understand and comply with the values, commitments and requirements described in this Code, and with applicable laws and regulations, and carry out their work in compliance with good professional and high ethical standard.

## HONESTY

Employees should be honest, uphold the spirit of respecting contracts and seeking truth from facts, and keep their promises. Employees have a duty of loyalty towards Lynk & Co and are required to always act in the best interest of the company.

## DILIGENCE

Employees must exercise their activities with diligence; in particular, employees:

- Must make efforts to learn and ensure that they do not fall below the market average professional competence.
- Ensure that they follow all health and safety measures.

## TEAMWORK

Employees are expected to work with their colleagues as a team, trust and collaborate with each other, and communicate actively to create a work environment that fosters creativity.

## EFFICIENCY AND TRANSPARENCY

Employees are expected to keep pace with business needs, continue to optimize systems and processes, create an open, transparent, efficient, pragmatic, and inclusive atmosphere, and provide work efficiency.



## EXPECTATIONS ON MANAGERS

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Lynk & Co's Managers have important responsibility in terms of business integrity, as they:

- are expected to be role models and promote ethical conduct;
- must explain their team members the importance of maintaining business integrity and complying with applicable laws and regulations and with this Code;
- must take all measures to prevent violations of laws, regulations and the Code;
- must protect employees who report violations, to ensure that they will not receive any form of retaliation;
- have to answer their team's needs in terms of advice and help.

## EXPECTATIONS ON BUSINESS PARTNERS

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Lynk & Co expects its business partners to abide by the same principles as those set out in this Code, or similar principles, as well as the laws and regulations in the places where they operate. Lynk & Co also expects all Business Partners to ensure that those principles are communicated to and complied with by their employees and subcontractors.

## QUESTIONS REGARDING THIS CODE

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Should you have any question regarding this Code, you need to consult with your Manager first. In most instances, this should satisfactorily address the concern. You may also seek advice from your local HR Department or the Compliance/Legal Department.



# PEOPLE POLICY

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It is Lynk & Co's responsibility to ensure that its employees are provided with a sustainable working environment and with fair terms of employment. Sustainability is part of our culture and values and all employees are expected to support Lynk & Co's commitments.

Lynk & Co values everyone's ideas and initiatives and is committed to creating a positive, diverse and respectful working environment. Diversity involves appreciating people as individuals and for the contributions they make. When we view each other with respect for our backgrounds and individual differences, we can draw on the varied skills each of us offers. We believe that by respecting each other and working together, we achieve better results.

Thus, we are committed to a work environment, where all employees respect one another, value each of our colleagues' contributions, and treat each person fairly.

As employees, we all need to contribute to Lynk & Co's commitments and follow these principles not only within the workplace but also when representing Lynk & Co outside of the workplace.

Attracting, developing, and retaining highly skilled employees is a top priority, and we are committed to the development of our employees' skills, knowledge, and creative potential.

## 1. HUMAN RIGHTS

Lynk & Co is committed to respect and work in line with internationally proclaimed human rights (including the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Compact) and ensure that we do not abuse any part of the human and labor rights standards.

## 2. CHILD LABOR

Child labor is not accepted in Lynk & Co. In no event will we employ any person below the age of 16 or the country's legal minimum age, if over 16,

# PEOPLE POLICY

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Government-authorized job training or apprenticeship programs that are clearly beneficial to the participating individuals may be exceptions.

## 3. FORCED LABOR

Forced labor, including debt bondage, trafficking and other forms of modern slavery is not accepted in any of Lynk & Co 's businesses. We do not engage in, or support the use of forced labor, nor shall any employee be required to deposit identity papers at the start of employment. Employees are free to leave their employment after a notice period, as required by law and contract.

## 4. LABOR UNION AND COLLECTIVE BARGAINING

All employees have the right to join associations (or form associations in accordance with applicable legislation), and to bargain collectively concerning the relationship between the employer and the employees.

Lynk & Co does not accept disciplinary or discriminatory actions against employees who choose to peacefully and lawfully join the labor union or any other lawful association.

## 5. EQUAL OPPORTUNITIES, NON-DISCRIMINATION AND ANTI-HARASSMENT

As part of our commitment to having a diverse and inclusive workplace, Lynk & Co wants its employees to have equal opportunities based on competence, experience and performance. Consequently, we have zero tolerance towards discrimination, harassment and bullying.

Lynk & Co does not discriminate against any employee or applicant for employment because of age, race, religion, color, gender, disability, national origin, marital status, pregnancy status, sexual orientation, gender identity, or any other criteria or characteristic prohibited by law or otherwise irrelevant for the position. This principle extends to all decisions relating to hiring, promotion, transfer, recruitment, termination, benefits, rates of pay, other forms of compensation, and selection for

## PEOPLE POLICY

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training. Making employment decisions based on any of these personal characteristics is against our Code.

All employees must treat each other with courtesy and respect. Consequently, we do not tolerate harassment (whether sexual or else) or bullying (i.e., any negative action directed against an individual employee) of any kind. What constitutes harassment may differ somewhat between different cultures, and you must be careful not to assume that your local standards are globally acceptable. Harassment can include racial, ethnic, religious, or sexual jokes, sexual advances or requests for sexual favors, bullying, abusive language, physical aggression, intimidating or violent behavior, disparaging comments, or otherwise unwelcome and inappropriate conduct—whether verbal, physical, visual, or electronic, and whether committed in person or in some other way.

### 6. HEALTH AND SAFETY

Lynk & Co offers and maintains a safe and sound working environment that meets or exceeds current standards and legislation, globally. Safety must always be the most important factor in our decisions. We also provide our employees with all necessary labor protection appliances, equipment, facility and tools.

Our goal is to protect the health and safety of employees, visitors, and contractors and comply with applicable regulatory requirements. We provide understanding, awareness, support, and the necessary tools to identify and mitigate potential health and safety risks in our facilities, and we continually seek opportunities to make new and existing facilities inherently safer.

Lynk & Co conducts risk evaluations during the design and construction phases of a manufacturing facility and during production, in order to minimize and manage potential risks. Lynk & Co will establish safety control and environment protection systems that meet or exceed local requirement. We will also urge our business partners (including but not limited to our suppliers, distributors, and contractors) to

# PEOPLE POLICY

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follow our policies regarding health and safety.

Each employee must personally take responsibility for their own health and safety and contribute to a safe and secure working environment for them and their colleagues. We all have a responsibility to prevent injury and illness in the workplace by adhering to safety guidelines and policies. In particular, employees must ensure that they know all applicable safety rules and routines –if not, they must ask their manager.

## 7. DRUGS AND ALCOHOL

In order to ensure a safe workplace, Lynk & Co does not accept any form of abuse, usage or possession of illegal or unauthorized drugs. Alcoholic beverages in connection with office parties, business trips and representation is prohibited without permission and when such permission from senior management has been obtained shall be used responsibly.

## 8. WELFARE

Employees' working conditions must comply with applicable statutory requirements.

Salaries and benefits shall always be fully comparable with legal or industry standards. Lynk & Co will ensure that employees are covered by pension and insurance benefits, either by Lynk & Co or from another actor.

## 9. WORKING HOURS

Lynk & Co shall comply with applicable national legislation and collective bargaining on working hours. Lynk & Co shall respect the employees' right to leisure time and work-life balance.

# ANTI-BRIBERY AND CORRUPTION

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## 1. CORRUPTION

Corruption is the abuse of entrusted power for private gain. Corruption is considered to be one of the biggest threats to social development and the market economy. Corruption disturbs competitive markets, leads to misallocation of resources and violations of human rights. It undermines the rule of law and the public's trust in business leaders. It is our responsibility as a company, and as individuals representing Lynk & Co, to prevent corruption in all its forms.

Lynk & Co is against all forms of bribery and corruption. It is our policy to comply with applicable laws, rules and regulations governing anti-bribery and corruption in all countries where we operate.

## 2. BRIBERY

Bribery can be described as offering/giving or demanding/receiving something of value with a view to influence a transaction or decision.

We do not accept any form of bribery regardless of its nature. This includes both public and commercial bribery. Consequently, employees shall **never** directly or indirectly offer, pay (or authorize the payment of) or receive bribes, or provide or request anything of value, in order to obtain or retain business or otherwise gain an undue advantage.

No employee will face any adverse consequences for refusing to pay bribes, even if it means a loss of business.

## 3. FACILITATION PAYMENTS

Facilitation payments are small payments or gifts made directly to an Official for the performance of a routine governmental action. An example is where a government official is given money to carry out or speed up the performance of an existing duty. Facilitation payments are strictly prohibited.

# ANTI BRIBERY AND CORRUPTION

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## 4. GIFTS, FAVORS AND HOSPITALITY

In order to maintain the reputation of Lynk & Co, when we provide or accept gifts and hospitality, we must strictly follow the laws and regulations, business practices, and internal company policies to ensure that we will not be accused of improper conduct or violate the laws related to bribery.

### 4.1 GIFTS AND FAVORS

Gifts or favors should never give the appearance of impropriety. No gift or favor, regardless of its value, may ever be given as an inducement, or with an expectation of a favorable act in return. This is considered a bribe.

Customary gifts of limited nominal value may be allowed, as long as there is no corrupt intent.

What is considered “limited nominal value” can vary from country to country but shall never exceed RMB 400 (or the equivalent of EUR 50).

### 4.2 INNAPPROPRIATE GIFTS AND FAVORS

Certain categories of gifts or favors are prohibited simply because they are inappropriate by nature. Examples of gifts or favors that are inappropriate and may not be given nor received irrespective of their value include:

- a) Monetary gifts (cash, gift certificates, shopping vouchers etc.).
- b) Monetary loans, providing of security, waivers of receivables and the like, on terms that are disproportional to the current market.
- c) Side deliveries of products or services at less than market value.
- d) Benefits conditional on the recipient providing something that is not approved by Lynk & Co.
- e) Concealed commissions or kickbacks to employees or others.

# ANTI BRIBERY AND CORRUPTION

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Additionally, gifts or favors are prohibited during business negotiations or if a dispute is pending.

Inappropriate gifts (including gifts above limited nominal value) must be refused or returned. Gifts and benefits of inappropriate nature that for some reason cannot be returned must be turned in to the relevant Department in time for further arrangement.

Employees shall **never ask** for a gift or favor from a third party that does (or is seeking to do business with) Lynk & Co.

## *4.3 HOSPITALITY AND ENTERTAINMENT*

Socializing with suppliers, dealers, and other business contacts can be helpful in cultivating a good working relationship, but it is not acceptable when hospitality (e.g., meals and drinks) is used as bribery, that is to say if it is offered with a view to inappropriately influence a business decision or gain an unfair advantage.

Hospitality or entertainment offered or received should always be reasonable, appropriate and have a legitimate business purpose.

Certain types of hospitality and entertainment are prohibited simply because they are inappropriate by nature. Examples of hospitality that are inappropriate and may not be given nor received irrespective of their value include:

- Adult entertainment.
- Hospitality or entertainment that is not work-related (e.g., if the entertainment is purely a leisure activity).

Additionally, in order to avoid the appearance of impropriety, hospitality and entertainment is prohibited during business negotiations (new or annual) or are about to engage in business negotiations or if a dispute is pending.



# ANTI BRIBERY AND CORRUPTION

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## *4.4 GIFTS, FAVORS AND HOSPITALITY TO OFFICIALS (INCLUDING POLITICAL CANDIDATES)*

Most countries have laws that prohibit the bribery of local or foreign Officials. Therefore, it is important to always be extra cautious when dealing with Officials, since stricter rules often apply, and the appearance of impropriety is usually much higher.

The notion of Official is very broad and includes (but is not limited to):

- Government members;
- employees of a government department or agency (including, inter alia, tax authorities, Embassies, Consulates, public universities or schools), regardless of rank or title;
- employees of any government-owned or government-controlled business entity, as well as of joint-ventures where a government has a significant stake;
- members of royal families and employees of entities owned or controlled by members of royal families;
- members of political parties and political candidates and representatives;
- Judges and Court employees;
- employees of international organizations, such as the United Nations, the World Bank, and the European Commission.

## 5. INDIRECT CORRUPTION OR BRIBERY

### *5.1 CORRUPTION OR BRIBERY OF A PERSON WHO CAN INFLUENCE A BUSINESS DECISION*

It is an unacceptable corrupt practice trying to influence a person's business decision by providing a gift or favor or by extending hospitality to a relative (partner or other family member) of this person or to anyone having influence over this person's decision (such as friend or any other close acquaintance).

# ANTI BRIBERY AND CORRUPTION

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## 5.2 CORRUPTION OR BRIBERY VIA THIRD PARTIES

Lynk & Co recognizes that it is not unusual to use third parties for paying bribes or other corrupt payments. Such third parties may appear as agents, suppliers, and/or business consultants. This practice is considered indirect bribery and, as such, is prohibited.

It is Lynk & Co 's policy to avoid using agents, especially when dealing with Officials. In exceptional cases where the use of agents cannot be avoided, the integrity of the agent must be carefully investigated, and the agent must be approved by the Compliance/Legal Department prior to entering into any agreement with the agent.

## 6. DONATIONS

Donations, sponsorships or other corporate giving are subject to prior written approval from the Chief Executive Officer. Donations can be made only to local social organizations and made in a transparent manner, with specific identification of the receiving party(ies) and plan for use. Cash donations are strictly prohibited, and donations shall never have any corrupt intent (no return of interest shall be expected as a condition for providing any donation). Additionally, no donation can be provided to any organization in which Lynk & Co has or may have business interest. In all cases, the reasons and purpose of such donations must be properly recorded in Lynk & Co 's records.

Contributions to political parties or individuals and organizations involved in politics are always prohibited.

Employees are required to comply with the laws that apply to lobbying activities.

## 7. KEEP IN MIND – BE OPEN AND TRANSPARENT

Please be mindful that international anti-corruption laws generally require detailed and accurate accounting records of transactions. Thus, gifts, favors, hospitality, donations, sponsorships or other corporate giving must be handled in a transparent

# ANTI BRIBERY AND CORRUPTION

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manner and properly recorded in Lynk & Co 's records.

Make sure to always involve your manager.

## CONFLICTS OF INTEREST

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A conflict of interest refers to a situation where an employee has decision-making authority on behalf of Lynk & Co and there is a conflict or potential conflict between the employee's personal interests and Lynk & Co's interests, which makes it difficult for employees to perform their work duties effectively and fairly, which may harm the company's interests.

In line with their duty of loyalty towards Lynk & Co, employees must make business decisions free from any conflicting external influence. All business decisions must be based on Lynk & Co 's best interest and shall never be improperly influenced, or appear to be improperly influenced, by any other consideration.

Employees avoid situations where their personal activities and interests (or those of a relative -partner or other family member- or a close acquaintance) conflict or appear to conflict with the best interests of Lynk & Co. Consequently, employees must ensure that they identify such situations and eliminate any such potential conflict of interest.

Examples of conflicts of interest include:

### 1. OUTSIDE ACTIVITIES AND FINANCIAL INTERESTS

If, as an employee, you have an independent business venture or another job outside your work at Lynk & Co, this can create a conflict in different manners.

First, working for -or providing services to- a Lynk & Co competitor, supplier, or other

# CONFLICTS OF INTEREST

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business partner can easily present a conflict by dividing your loyalties between your responsibilities at Lynk & Co and your outside endeavor and is therefore strictly forbidden (for the avoidance of doubt, engaging in unpaid academic organizations or social welfare work is acceptable, after approval by Lynk & Co).

Further, any outside work requires proper prior authorization from Lynk & Co 's Head of HR and in all cases should not interfere with your duties at Lynk & Co, including the quality of your work and your overall professionalism. Additionally, any outside activity must comply with all other provisions of this Code and of Lynk & Co 's policies, in particular regarding the protection of Lynk & Co 's confidential information and intellectual property right

Holding, directly or indirectly through a third party, a significant financial interest in one of Lynk & Co 's competitors, customers, or suppliers could also create a divided loyalty. A significant financial interest is one that is large enough (generally, greater than 1% ownership) that it creates the appearance of a conflict of interest. This also applies to financial interests held by a member of your household or immediate family.

## 2. CORPORATE OPPORTUNITIES

We cannot make objective business decisions if we are competing with Lynk & Co. Consequently, employees may never take advantage of opportunities developed on Lynk & Co 's behalf for their own personal benefit. This includes not pursuing business or investment opportunities discovered through the use of Lynk & Co property or information. Similarly, you may not assist friends, family members, or others in taking such business or investment opportunities for personal gain.

Use of Lynk & Co confidential information for private gains or disclosure of any confidential and non-public information to close relatives or acquaintances for private gain are also prohibited.

# CONFLICTS OF INTEREST

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## 3. RELATIONS WITH FAMILY MEMBERS

### *3.1 PERSONAL OR FAMILY RELATIONSHIPS BETWEEN TWO EMPLOYEES*

When two Lynk & Co employees have a personal or family relationship – especially if they also have a reporting relationship, monitoring or partnership – the subordinate may seem to receive preferential treatment or favoritism. You should never be placed in a position where you have direct decision-making authority over a family member (such as superior relationship), positions with functional supervisory authority (e.g. monitoring, auditing, finance and compliance etc.) and positions of close relationship (e.g. under the same leader), or vice versa.

### *3.2 BUSINESS DEALINGS BETWEEN LYNK & CO AND AN EMPLOYEE'S CLOSE RELATIVE OR ACQUAINTANCE*

You should immediately inform your manager if any close relative or acquaintance works for one of Lynk & Co's suppliers, distributors, or competitors. If you are in such a situation, necessary measures to avoid involvement in the supplier selection or contract negotiations must be taken.

## 4. OBLIGATION TO REPORT

Employees are required to identify situations that could potentially rise to become a conflict of interest, immediately disclose such situations to their manager, and together with their manager, eliminate the conflict of interest appropriately.

Employee and manager are required to inform the employee's HR Department of any conflict of interest eliminated and, if they have not managed to eliminate the conflict of interest or any significant conflict of interest, the Compliance/Legal Department must be consulted.

# PROTECTION OF PERSONAL DATA

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It is Lynk & Co's policy to abide by applicable data protection and privacy laws and regulations in the countries where we operate.

We respect and safeguard the privacy of our customers, employees and business partners.

Generally speaking, employees are expected to adhere to the following principles when collecting and using personal data:

1. We only collect personal data for specified, explicit and legitimate purpose(s).
2. We process personal data based upon valid legal bases.
3. We only process personal data that is necessary in relation to the purpose(s).
4. We inform individuals about the processing of their personal data.
5. We retain personal data only for the time necessary to fulfill the purpose(s).
6. Personal data processed must be accurate and, to the extent necessary, up to date.
7. We consider and address requests from individuals (such as access to their personal data or have the data corrected, deleted, blocked or transferred) in accordance with applicable laws.
8. We implement appropriate technical and organizational measures to protect personal data against any form of accidental or unlawful loss, alteration or disclosure.
9. We only disclose personal data on a need-to-know basis; disclosure to individuals/entities outside of Lynk & Co is subject to Lynk & Co having legitimate grounds to do so and necessary agreements and protective measures must be put in place.
10. Cross-border transfers of personal data must comply with applicable law and is always subject to adequate protection measures to safeguard the data.

# COMPLIANCE WITH COMPETITION LAWS

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Lynk & Co is committed to supporting a fair global market. We compete with intensity by creating the best technologies and selling the best products at the most competitive prices. We shall only use legitimate means of obtaining competitive information, respect the confidential and intellectual property rights of our competitors and other third parties, and always comply with antitrust and competition laws.

Lynk & Co is committed to always competing fairly and strive to build sound relationships with customers, dealers and suppliers.

## 1. RELATIONSHIPS WITH OUR COMPETITORS

Lynk & Co shall refrain from any anti-competitive practice involving a competitor, which includes but not is limited to entering into any understanding or agreement, whether verbal or in writing, with any competitor concerning prices (including discounts or terms of sale), markets, customers, suppliers or territories.

The notion of competitor refers to any entity that offers products or services that are similar to those of Lynk & Co, whether this entity belongs or not to the automotive industry. Accordingly, the scope of Lynk & Co 's competitors may be very wide and vary from time to time.

An informal or implied understanding between Lynk & Co and a competitor or business partner, even one where intentions are harmless, could infringe applicable competition law.

A mere discussion with a competitor where sensitive information is exchanged constitutes an informal or implied understanding that is contrary to competition law.

Sensitive information includes but is not limited to pricing, costs, discounts, promotion or marketing plans, rebate rates, bidding plans, profit rates, credit terms, customer information, financial performance, production capacity, and



# COMPLIANCE WITH COMPETITION LAWS

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development strategy or expansion plans.

As a general rule, Lynk & Co avoids exchanging information with its competitors. However, there may be situations where the exchange of information may be justified, for example, to facilitate a research and development project. In all cases where sensitive information is communicated outside the group, this must be done in compliance with applicable competition laws. The Compliance/Legal Department must be involved in all cases where sharing sensitive information is considered.

This principle is also true when we participate in fairs or trade association meetings, or even during a personal social gathering. We must stay alert for these situations at meetings or conferences, and if any of these topics arise, we must stop the conversation immediately, raise our concern, have it clearly stated in the meeting minutes and report it to the Compliance/Legal Department.

Lynk & Co wants all employees to understand applicable rules and they are expected to seek legal advice before interacting with any competitor.

Additionally, employees shall not seek to obtain illegally any competitor sensitive information (through espionage, bribery, theft or other improper means). Employees must refrain from disseminating any false or misleading information regarding competitors and their products or services in order to gain competitive advantage.

## 2. COMMUNICATION WITH OUR BUSINESS PARTNERS

As a principle, Lynk & Co shall refrain from any anti-competitive practice (or facilitating any anti-competitive business practice) involving one or several business partners (importers, dealers, workshops, suppliers, etc.).

This includes but is not limited to entering into any vertical price fixing (i.e., setting a fixed or minimum resale price or equivalent) or setting any territorial or customer restriction.

## COMPLIANCE WITH COMPETITION LAWS

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### 3. DEALING FAIRLY WITH OUR CUSTOMERS

We must treat our customers fairly. Communicating truthfully and accurately about our products and services is an essential part of our commitment to our customers. We must all make sure that our marketing materials are truthful and complete, our prices are determined independently in light of costs, market conditions, and competitive prices, and our contracts are negotiated in good faith.

### 4. EXPECTATIONS ON EMPLOYEES

Lynk & Co employees are expected to understand the competition laws principles that apply to their business activities, identify any potential unlawful practice and seek legal advice in such cases.

Inquiries regarding competition law matters from any authority or governmental body must be immediately notified to the Legal Department before providing any answer.

## SOUND RELATIONSHIPS WITH OUR BUSINESS PARTNERS

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As a principle, Lynk & Co aims to build long-term relationships with its business partners, founded on trust. Business partners must be selected fairly and objectively. Business partners include all Lynk & Co's suppliers or service providers and joint venture parties.

This means that our business partners must be chosen according to an open and transparent bidding process, on the basis of open competitive bidding. Lynk & Co's procurement procedures must be followed and offers must be compared and considered fairly, without any bias in the decision-making process (in particular, conflicts of interest must be avoided). A business partner's bidding information cannot be shared with another bidder.

## SOUND RELATIONSHIPS WITH OUR BUSINESS PARTNERS

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The selection of business partners must rely upon the quality of their products and services and their prices, but also on their business and social reputation and the environmental impact of their products. All business dealings with business partners must comply with applicable trade custom and laws and regulations.

Employees are not allowed to share a business partner's confidential information with another business partner or any other third party, unless this has been agreed upon by the concerned business partner and adequate confidentiality agreements have been entered into.

As stated above, Lynk & Co expects its business partners to abide by the same principles as those set out in this Code, or similar principles, as well as the laws and regulations that apply where they operate. Lynk & Co expects all its business partners to ensure that these principles are applied and communicated to their employees and subcontractors. Employees are expected to report to the Compliance/Legal Department any inappropriate conduct from a business partner.

## PROTECTION OF COMPANY ASSETS

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Lynk & Co 's assets are valuable and must be protected no matter where they are located, stored, used, processed or shown. Proper management of Lynk & Co 's assets is also needed to support compliance with legal and regulatory requirements as well as internal policies and directives.

The notion of assets includes (1) tangible assets, such as capital, fix assets which include but not limited to buildings, equipment, and tools, inventories and office supply, and (2) intangible assets, such as land use rights, confidential information, brands and goodwill, intellectual properties, and business opportunities.

Fraud and theft shall never be tolerated at Lynk & Co. Fraud is the misuse of Company

## PROTECTION OF COMPANY ASSETS

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resources or intentionally concealing, altering, falsifying, or omitting information for personal benefit or the benefit of others. Examples of fraud include: altering Lynk & Co 's reports to meet productivity goals, falsifying time reports (by, e.g., overstating worked hours or reporting hours while being late or absent from work) in order to earn more, misstating financial information in Lynk & Co 's books and records.

Employees are responsible for protecting and correctly using Lynk & Co 's assets. In particular:

- Losses and/or damages to and waste or abuse of Company assets should be avoided. As a principle, assets shall be used properly for Lynk & Co 's business purposes only. However, occasional and limited use of company assets, such as computer resources and phones, is permitted for private, non-commercial use if it does not compromise Lynk & Co 's interests or adversely impact employee's performance in a negative way.
- Employees shall not use any of Lynk & Co 's assets (in particular IT resources, facility, information or personnel) for any side business activity or for private gains (whether their own or a third party's).
- Employees are not allowed to conduct personal businesses in the workplace and during work hours.
- Lynk & Co 's confidential information and intellectual property must be protected.
- Lynk & Co 's records must be true and accurate. For more information, see page 24.
- Keep in mind that the IT resources (work computer, mobile devices, IT services such as communication tools and servers) issued to you by Lynk & Co are Lynk & Co 's assets and are subject to internal rules and policies on information storage and use.
- Employees must promptly report to Technology and Business Innovation Department any loss of or damage on IT resources.
- All files and documents stored on Lynk & Co 's IT resources are considered Lynk & Co 's assets. Lynk & Co is allowed to monitor these files and documents or may request employee to allow access to such files and documents and concerned employee is obligated to accept.

## TRUE AND ACCURATE BUSINESS RECORDS

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- Employees have a duty to protect Lynk & Co 's assets. In particular, all measures implemented by Lynk & Co to preserve the confidentiality and integrity of information (such as IT security measures) must be followed. Lynk & Co 's brand and goodwill must also be safeguarded and any activity that may negatively impact Lynk & Co 's assets must be avoided.
- In case of counting, handover or transfer of any Lynk & Co 's assets, employees shall carry out their duties with diligence and make sure that these assets are secured.

Lynk & Co keeps and maintains business records in both electronic and paper forms to support its operations. When these records are accurate, Lynk & Co is able to make informed decisions about how to run its business and plan for the future. Records also support Lynk & Co in fulfilling its external obligations, such as financial disclosures, safety reporting, government required reports, documents subject to litigation, and other filings.

Therefore, the integrity of Lynk & Co 's record keeping, record retention policy, and reporting systems is of utmost importance in order for us to comply with financial, safety, or other critical reporting regulations. Financial records, books and reports must accurately reflect the transaction and the underlying business dealing. Similarly, transaction details, amounts, time and other relevant details must be accurately and promptly recorded.

As Lynk & Co employees, we all record information of some kind, whether we design new products, record our work hours, sign contracts with suppliers or perform any other work-related activity.

Lynk & Co shall never tolerate any of the following misbehaviors:

- a) Intentionally providing false or misleading information in reimbursement applications, reports and records.
- b) Falsifying Lynk & Co 's financial and non-financial documents or records.
- c) Selling, transferring or disposing any of Lynk & Co 's assets without proper authorization and without properly recording the sale, transfer or disposal.

## TRUE AND ACCURATE BUSINESS RECORDS

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- d) Improperly obstructing or disrupting the work of regulatory and justice authorities, by, e.g., hiding, modifying, destroying or tampering information or assets pertinent to an ongoing litigation or investigation.
- e) Removing, relocating or destroying Lynk & Co records without proper authorization.
- f) Removing any protection measure or control implemented by Lynk & Co to safeguard its assets and ensure the accuracy and completeness of its records.

### RECORDS AND INFORMATION RETENTION

Various legal and contractual obligations require Lynk & Co to retain certain documents, drawings, electronic records (including emails), and other information (records) for a defined period after the record is created (called retention period). All files and records must be properly stored and, when not immediately needed, archived until the end of the retention period.

Employees are required to understand which of the records they create should be saved and for how long. All records and information must be kept in accordance with record retention requirements under applicable laws and regulations and applicable accounting principles.

A "Legal Hold" may be issued by the Legal Department in order to preserve all forms of relevant information when litigation is reasonably anticipated. When a Legal Hold is issued, the normal disposition or processing of records (such as backup tape recycling, archived media and other storage and management of documents and information) is suspended. Employees must ensure that all versions and copies of records on Legal Hold are preserved until the associated Legal Hold is removed by the Legal Department:

## INTELLECTUAL PROPERTY

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Any Intellectual Property element (including but not limited to, new inventions, processes, works of authorship, technology advances, or unique solutions to business problems etc.) developed or discovered during the scope of employment with Lynk & Co must be identified

# INTELLECTUAL PROPERTY

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and disclosed to the Legal Department.

This will enable Lynk & Co to take all appropriate measures in order to protect our Intellectual Property under applicable patent, trademark, copyright laws and regulations and, thus, safeguard our innovations.

Recommended course of action:

- a) Lynk & Co shall seek to obtain patent, trademark and design protection or other intellectual property rights for its valuable technology and business innovations or other assets;
- b) Until such protection has been applied for, the concerned technology or business innovation or other asset must be considered a trade secret and must remain strictly confidential (it should not be used, disclosed or marketed); otherwise, Lynk & Co 's Intellectual Property rights on the innovation would be forfeited.
- c) In all cases, employees are required to safeguard Lynk & Co 's and/or its affiliates' trade secrets. Lynk & Co 's trade secrets may be shared only in extremely limited situations, and subject to the Chief Executive Officer's prior approval and strict contractual limitations. Unauthorized disclosure of trade secrets is never acceptable.
- d) Lynk & Co shall take all appropriate actions against those making unauthorized use of, or misappropriates, these rights.

Sharing Lynk & Co 's Intellectual Property with a third party shall always be subject to proper authorization from Legal Department and the execution of a confidentiality agreement with the third party.

Just as we expect others to observe Lynk & Co 's and/or our affiliates' Intellectual Property rights, we are also committed to avoiding unlicensed or unauthorized use or misappropriation of Intellectual Property that is valid and owned by others.



# CONFIDENTIALITY

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Information is an important asset of Lynk & Co. The notion of information refers to any and all kinds of information or data, regardless of:

- the form (digital, paper, physical property such as a prototype, or other format);
- whether it is generated internally by its employees or externally by business partners::
- the medium of communication (written or oral information, such as: meeting minutes, memos, handwritten notes, technical drawings, photographs, computer files, e-mail, voice mail or other business conversations); and
- how the data is stored (e.g. on a Lynk & Co owned computer or smartphone, external cloud storage, or handwritten notes).

## 1. REQUIREMENTS REGARDING LYNK & CO 'S INFORMATION

Lynk & Co 's information must always be classified and marked according to its level of sensitivity. All employees are therefore required to classify and mark information as one of the following:

- Public: public information is information that can be circulated freely outside of Lynk & Co.
- Internal: Internal information (such as employee announcements, phone lists) can be circulated freely inside Lynk & Co but sharing with third parties must be on a need-to-know basis only and is subject to certain safeguards.
- Confidential: confidential information is any information, and which (i) has not been officially published or released through authorized channels, (ii) is not intended to be disclosed, and (iii) if revealed, could be detrimental to the interests of the organization to which such Information relates. Examples of Lynk & Co confidential information include (but are not limited to):
  - Business and strategic plans and opportunities (including planned mergers or acquisitions, investments or divestments, major strategic collaborations);
  - Sales and marketing plans;
  - Prices and pricing policies;
  - Competitive or technical Information;
  - Personal Data;

# CONFIDENTIALITY

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- Finances and financial statements either actual or forecasted (other than published officially);
  - Data access password/logon information;
  - Drawings, design, inventions, specifications, technical reports and photographs of unreleased products;
  - Current and future products and services, including technical information, software, new products and service ideas and structures;
  - Research and development programs;
  - Core manufacturing information;
  - Supplier product and component pricing data.
- 
- "Secret information" refers to any confidential information that is of a strategic nature and that, if disclosed in an unauthorized manner, would cause substantial, severe, or irreparable damage to the organization to which such information relates. Examples of Lynk & Co secret information include (but are not limited to):
    - Financial projections or targets, results prior to publication.
    - Planned acquisitions.
    - Strategic product and cycle plans.
    - Future vehicle design drawings.
    - Detailed building security designs.
    - Certain high-value trade secrets.

## 2. REQUIREMENTS REGARDING LYNK & CO'S CONFIDENTIAL AND SECRET INFORMATION

In general, protecting Lynk & Co's confidential or secret information is critical and there are much stricter rules for access, communication and circulation of confidential/secret information. In particular, we cannot freely use confidential/secret information or disclose it without proper prior authorization until it has been officially published by an authorized channel.

# CONFIDENTIALITY

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Accordingly, employees are required to:

- a) Share confidential/secret information internally on a need-to-know basis only; sharing of confidential/secret information with a third party must also be on a need-to-know basis and is subject to adequate confidentiality undertakings.
- b) Refrain from displaying or discussing confidential/secret information in public places or on unsecured devices, or disclosing confidential/secret information to relatives, friends or other people.
- c) Return their badge, keycard and confidential/secret information (note that they remain bound by their confidentiality obligations) when they leave Lynk & Co and access to Lynk & Co 's IT resources must be properly retrieved for these employees.
- d) Be aware, understand and apply all measures implemented by Lynk&Co to safeguard information (in particular those implemented to protect all IT resources against unauthorized access).
- e) Inform immediately the Compliance/Legal Department in the case of loss of confidential or secret information, or unauthorized access (by another employee or a third party who does not have a need-to-know) to confidential or secret information.

## 3. PROTECTING THIRD PARTY 'S CONFIDENTIAL INFORMATION

Third party 's confidential information corresponds to any information received by Lynk & Co from a third party (e.g., a business partner) under a confidentiality agreement or obligation. We have a duty to protect this information in accordance with said confidentiality agreement or obligation.

# INSIDE INFORMATION

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Inside information is defined as non-public material information of a precise nature that relates directly or indirectly to Lynk & Co and that, if made public, would be likely to have

# INSIDE INFORMATION

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an impact on the price of Geely's or Volvo Cars AB's securities.

Lynk & Co is owned by Geely, a public company listed on the Hong Kong Stock Exchange, and Volvo Car AB that has issued bonds that are listed on the Luxembourg stock exchange. To the extent Lynk & Co's confidential information is likely to affect the price of the securities of Lynk & Co's parent companies, it is deemed to be inside information (see definition below) and is then subject to specific laws and regulations (in particular market-abuse regulations) in multiple jurisdictions and disclosure requirements. As employees we should all be aware of and abide by these regulations.

## COMMUNICATION OF INSIDE INFORMATION

According to laws, individuals who have knowledge of inside information may not at any time, until the Inside Information becomes public:

- Directly or indirectly trade in the securities that can be affected by the information; and
- induce anybody else to acquire or sell (by either recommending or advising or encouraging to do so) the securities that can be affected by the information.

Furthermore, Insiders may not disclose Inside Information to anyone inside or outside of Lynk & Co if not duly authorized to do so.

Please note that the restriction on trading in securities when having access to inside information is not merely relating to Lynk & Co and its shareholders. It could also relate to one of our customers or suppliers.

## COMMUNICATION MADE ON BEHALF OF LYNK & CO

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Responsible and appropriate communication is essential not only for our business, but also for our reputation.

# COMMUNICATION MADE ON BEHALF OF LYNK & CO

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## 1. REQUIREMENTS REGARDING LYNK & CO 'S COMMUNICATIONS

As a general principle, all communications made by Lynk & Co or on behalf of Lynk & Co must adhere to applicable legislation, regulations and standards.

Employees involved in Lynk & Co 's communications (or managing third parties creating communications for Lynk & Co) must ensure that:

- Only true and accurate information is communicated; all facts must be communicated clearly in order to avoid any misunderstanding and be based on accurate information.
- No confidential information is disclosed in Lynk & Co 's communications, unless duly authorized.
- Communications follow the principles that apply to the protection of personal data and intellectual property.
- Communications do not discredit a competitor or its products and services.

## 2. SPEAKING ON BEHALF OF LYNK & CO

Employees are not authorized to speak on behalf of Lynk & Co unless they are duly authorized to do so, either according to their specific job duties, a delegation of authority, or in accordance with the provisions of any corporate policy or directive or any instruction. Lynk & Co 's spokespeople are the only employees authorized to make public comments on matters relating to Lynk & Co.

Employees have the responsibility to know whether they are authorized to speak on behalf of Lynk & Co and, in case of doubt, they should not make any form of communication and are expected to contact the Marketing and PR Department. If they are contacted by outside sources or the media requesting information, employees must refer to the Marketing and PR Department.

## 3. RESPONSIBLE USE OF SOCIAL MEDIA

As employees, we all have a responsibility to be mindful when using social media networks.

# COMMUNICATION MADE ON BEHALF OF LYNK & CO

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When using social media, please keep in mind the following:

- Be nice, have fun and connect.
- Act responsibly and ethically. Follow Lynk & Co's privacy policy.
- Use social channels terms and conditions.
- Spread all Lynk & Co's social media posts – be our ambassador.
- Respect applicable financial disclosure laws by ensuring the confidentiality of stock price-sensitive and material non-public Information.
- Don't share information about Lynk & Co's customers.
- Don't engage in possible crisis situations.
- Don't comment on legal matters.
- Don't represent yourself or Lynk & Co in a false or misleading manner. The comments or information that you publish on personal social media sites should not inadvertently appear to be made on behalf of Lynk & Co; therefore, personal posts should clearly state that they are personal opinions and do not reflect Lynk & Co's official position.

## SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

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### 1. SOCIAL RESPONSIBILITY

Lynk & Co will actively participate in the development of the communities where it has operations, by supporting local charities and by investing in local community services, environment protection, culture, sports, education, public welfare and infrastructure, public safety and art events.

Lynk & Co also aims to maintain a good relationship with local government, authorities, organizations and groups and local residents.

Lynk & Co will value the local labor forces and endeavor to build a local and diverse labor force.

## SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

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Lynk & Co encourages employees to participate in local public welfare and charity events.

All donations must follow applicable laws and regulations, as well as the Anti-Corruption principles.

### 2. ENVIRONMENTAL RESPONSIBILITY

Employees are required to follow the environment protection procedures implemented in order to protect the environment in pursuance to industry standard and laws and regulations.

Employees must follow the training given by Lynk & Co, so they can better understand relevant legal requirements and Lynk & Co 's expectations.

All employees should be familiar with industry and legal standards relevant to their work and operation and seeks to minimize Lynk & Co 's impact on the environment.

We seek to continue creating high quality products and at the same time minimize Lynk & Co 's environmental impact during the R&D and manufacturing phases as well as throughout the product life cycle in order to achieve sustainable growth.

## QUALITY AND SAFETY

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The key to the success of Lynk & Co is the quality of its products and we must strive to build products of the highest quality.

### 1. QUALITY CONTROL AND SAFETY ASSESSMENT PROCEDURES

Employees must familiarize themselves and strictly follow:



## QUALITY AND SAFETY

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- Lynk & Co 's quality control processes and mechanisms in order to make sure that all products delivered exceed international standards.
- Lynk & Co 's safety assessment procedures and mechanisms so as to ensure that all products meet or exceed national safety requirement.

### 2. SUPPLY CHAIN MANAGEMENT

Lynk & Co constantly seek to improve the management of its supply chain and use suppliers that are able to provide parts that support the improvement of the quality and safety of our cars.

### 3. CUSTOMER CARE

Lynk & Co maintains a comprehensive service network and support system, so that our customers benefit from efficient and convenient services, no matter when. Employees should always be attentive to customers ' needs and endeavor to satisfy such needs.

## ANTI-MONEY LAUNDERING

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Even though Lynk & Co is not directly subject to anti-money laundering laws and regulations, our products and services may be used to launder money deriving from illegal transactions or activities.

Money laundering means injecting assets (including but not limited to cash) acquired from illegal business into legal business activities with the purpose to hide the origin of such assets.

Employees are expected to identify "red flags" indicating that our products or services may be used to launder money. Red flags include (but is not limited to) the following:

## ANTI-MONEY LAUNDERING

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- a) Customer wants to pay in a currency different from the currency stipulated in the contract or commercial invoice.
- b) Customer wants to pay mainly in cash or cash equivalent.
- c) Customer wants to wire payment from another country.
- d) Payment is made (or requested to be made) by a third party instead of the original customer.
- e) Customer wants to pay by using multiple checks or bills.

In case of red flag, employee is required to obtain prior approval from the Legal Department prior to proceeding to any transaction with the customer. The Compliance/Legal Department will conduct adequate due diligence prior to deciding upon the transaction.

## TRADE SANCTIONS AND EXPORT CONTROL

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Trade sanctions and export control laws and regulations restrict or prohibit the trade and export activities with certain countries, entities, and individuals, or impose requirements for licenses before any goods, services, technology or information may be exported or exchanged with such countries, entities, and individuals.

The objective of trade sanctions and export control laws and regulations is mainly to put pressure on targeted countries and organizations, in order for example to:

- discourage them from violating international law or human rights, or
- prevent the proliferation of weapons of mass destruction and limiting flows of other weapons or goods that could be used for military purposes.

Trade sanctions and export control laws and regulations are complex and failure to comply with said laws may have severe consequences for Lynk & Co and could result in loss of business, substantial fines, reputational damage, and in some cases, imprisonment

# TRADE SANCTIONS AND EXPORT CONTROL

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for the involved employee(s).

Lynk & Co faces a risk of violating trade sanctions and export control laws and regulations if, for example, we are asked to export to certain countries or members of targeted organizations or are asked to export goods (e.g. cars and spare parts to cars) that could be used for military purposes.

All employees involved in any trade or export activity on behalf of Lynk & Co must be aware of, understand and strictly comply with applicable trade sanctions and export control laws and regulations.

All transactions involving international trade or transactions must be reviewed by the Legal Department in order to make sure that they do not violate trade sanctions and export control laws and regulations. In particular, the destination state and the customer must be checked to make sure that it is not a sanctioned country, individual or entity.

When importing and exporting products, freight forwarder agents and/or customs agents used by Lynk & Co should have proper qualification and/or government authorization.

Lynk & Co will keep an up to date list of product classification, export control and sanctioned individuals, entities and states. Relevant employees should familiarize themselves with this list.

If any transaction shows risks of violating trade sanctions/export control laws, employees are expected to report immediately to the Legal Department.

# INTERNAL REPORTING

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Lynk & Co expects its employees to report suspected or observed violations of this Code as soon as possible. Such concerns will be treated with the gravity they deserve and properly investigated.

## 1. REPORT VIOLATIONS OF THE CODE OF CONDUCT

Employees and/or business partners are expected to report any violation of laws and regulations, of this Code and other policies of Lynk & Co.

Lynk & Co will take all necessary steps to make sure that the identity of the individual reporting a concern will be kept confidential, to the extent possible.

We will ensure that any employee reporting a genuine concern in good faith (or who has cooperated in the course of an investigation or audit) does not suffer from any form of retaliation.

Any employee being made aware of a report for any reason whatsoever (in particular for purposes of the investigation) is required to refrain from sharing any information regarding the report -or even its existence- with any other employee.

## 2. REPORTING CHANNELS

You should initially and promptly discuss any concern with your manager or your local HR Department. Otherwise, you may contact the Compliance officer Compliance/Legal Department at the Legal Department (both personally or through [whistleblowing@lynkco.com](mailto:whistleblowing@lynkco.com))

Lynk & Co also offers a whistleblowing online system provided by an independent supplier. The system can be reached through [wb.2secure.se](https://wb.2secure.se), please use code NLG748 when reporting.

Reports can be made anonymously 24 hours a day, 7 days a week. Lynk & Co encourages real-name reporting and protects anonymous reporting. We will take all

## INTERNAL REPORTING

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necessary steps to make sure that a concern reported through any channel will be kept confidential to the fullest extent possible and that any reporter raising a genuine concern or cooperating in an investigation does not suffer from any form of retaliation.

# CONTACT

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You may contact Lynk & Co's Legal Department in any of these ways:

**Email:**

[Legal@lynkco.com](mailto:Legal@lynkco.com)

**Hotline:**

Online reporting through [wb.2secure.se](https://wb.2secure.se). Use code NLG748.

**Date:**

This Code of Conduct was adopted by Lynk & Co's Board of Directors on 2020-10-08. The Code is reviewed every other year or as needed.

**Published by:** Lynk & Co

The Compliance/Legal Department is responsible for ensuring that the latest version of the Code is published and available for all employees on Lynk & Co's Intranet.

This Code of Conduct shall not be construed as an employment contract and does not give anyone any right to continued employment by Lynk & Co