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# Introduction

These guidelines are here to help suppliers better understand and apply the requirements in the Lantmännen Supplier Code of Conduct. The guidelines are not exhaustive and each supplier is responsible for assessing its own ESG (environmental, social and governance) and sustainability-related risks and tailoring its governance and processes accordingly.

The guidelines offer some practical examples and recommendations to support responsible business practices—covering the areas in Lantmännen Supplier Code of Conduct.

# **Key points:**

- While the Lantmännen Supplier Code of Conduct lays out our mandatory requirements, these guidelines are not mandatory they are meant to support supplier alignment with global standards (like the UN and OECD).
- The steps and actions presented in the guidelines can be tailored and scaled for suppliers of all sizes and industries. Utilize the most relevant parts to your business.
- They can also help you prepare for collaboration or assessments with Lantmännen or other partners by understanding the issues such assessments could focus on.

We encourage you to use this guide as a practical resource for strengthening your sustainability and compliance efforts over time. Together, we can build more responsible and resilient supply chains.

This guidance refers to the Lantmännen Supplier Code of Conduct ver. 3.0, published in November 2025.



The Lantmännen Supplier Code of Conduct requirements are presented in coloured boxes.

# 1. General Requirements

# 1.1 Compliance with laws and regulations

Suppliers must comply with all laws and regulations applicable to their business.

This includes, but is not limited to, laws and regulations related to human rights, labour, health and safety, environmental protection, anti-corruption, anti-bribery, fair competition, anti-money laundering, trade sanctions, data privacy and business integrity.

# What does this mean for you?

- Stay informed about applicable laws and assign responsibilities within the teams for following regulation.
- Provide regular staff training in related topics to reduce risks and build awareness.
- Be aware of risks especially in areas such as hiring, purchasing, or payments to spot any potential risks.
- Encourage speaking up by creating a safe space for employees to raise concerns confidentially and without fear and when issues might rise, address them appropriately.

# 1.2 Sustainability Due Diligence

We expect our suppliers to commit to implement a risk-based sustainability due diligence process to identify, manage and mitigate risks related to human rights, environment and business ethics in accordance with the OECD Due Diligence Guidelines for Responsible Business Conduct.

#### What does this mean for you?

- **Implement a clear policy** including sections on respecting human and labour rights, protecting the environment and acting with integrity.
- Assess the related risks by focusing first on areas that are more likely to involve challenges, such as countries with weaker legal protections, activities involving manual or low-wage labour and places with sensitive environments.
- Act based on what you find by using your findings to inform decisions, like who you work with or how you monitor suppliers, starting with the most important or urgent risks.
- Monitor progress by setting related KPI's such as share high-risk suppliers, suppliers assessed and outcomes of those assessments
- **Communicate** how you are managing sustainability risks e.g., with a brief summary in a report or on your website or documents shared with customers directly.

• Make it easy for people to speak up by setting up ways for employees, suppliers, or communities to raise concerns safely and confidentially.

# 1.3 Responsible Sourcing

Suppliers must ensure that their sourcing practices are responsible and that suppliers' sub-suppliers also adhere to the requirements of this supplier code of conduct. This includes:

Careful selection of suppliers: Sourcing goods and services from suppliers who adhere to similar ethical and sustainability practices by following a risk-based due diligence process in supplier pre-screening, selection, and to mitigate and monitor identified human rights risks, environmental risks as well as risks related to anti-bribery, anti-corruption and trade sanctions in the supply chain including primary production when relevant.

#### What does this mean for you?

- Assess supplier practices before committing by using tools like self-assessment forms or checklists, a code of conduct for suppliers to sign, and public sources (e.g. sanctions or violations databases).
- $\bullet$  Consider risk when choosing suppliers e.g. based on supplier location or sector.
- Prefer suppliers who are clearly committed to sustainability e.g. through certification or related targets (like ISO 14001, FSC, SA8000).
- Include clear requirements in contracts such as commitment to follow your code of conduct, committing to ongoing improvement, agreeing to share information and take part in reviews and audits when needed and right to audit and terminate based on due diligence failures.
- Conduct sanctions screening and require commitment to anti-bribery and corruption.

**Supply chain transparency:** Providing sufficient transparency regarding the supply chain and origins of products and ingredients when requested, ensuring risk-based traceability throughout the supply chain.

- **Keep records of your supply chain**—especially tier 1, and tier 2-3 when relevant based on risk level
- Focus on high-risk areas first such as regions linked to forced or child labour or deforestation
- **Share information when** requested responding quickly and clearly when customers or partners ask where a product or material comes from
- Work together for better visibility by reaching out to sub-suppliers, through your suppliers espe-

cially in high-risk sectors like agriculture or mining — to better understand their practices.

Monitoring supply chain: Regular risk-based monitoring of the supplier's supply chain to ensure adherence to the requirements set out in this Supplier Code of Conduct including third party ethical, social and environmental audits and assessments when needed in accordance with their due diligence process.

### What does this mean for you?

- Monitor supplier progress regularly through dialogue around the Supplier Code of Conduct topics and/or performance scorecards and common KPI's.
- **Support improvements** when issues arise by collaborating with the supplier to create a corrective action plan, tracking the progress and offering support if needed.
- Look beyond Tier 1 suppliers (when needed) based on a risk-based approach to understand origins and production conditions of raw materials.

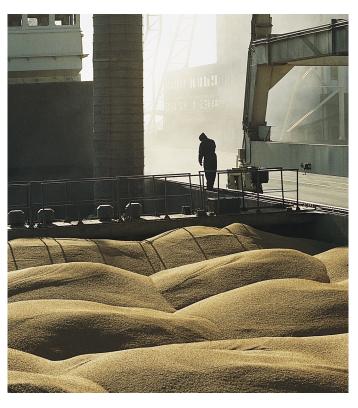
# 1.4 Monitoring and follow-up

Lantmännen reserves the right to monitor and assess the supplier's compliance with this Supplier Code of Conduct. This may include self-assessment questionnaires, audits, inspections and review of relevant documentation in relation to this Supplier Code of Conduct or to the business dealings between Lantmännen and the supplier. Suppliers are expected to cooperate fully and take remedial actions where necessary and, if requested, to provide Lantmännen with information to evidence

traceability, due diligence procedures and/or environmental performance of the supplier. Suppliers are expected to operate and maintain a grievance procedure to ensure that both employees and stakeholders safely can report any concern relating to violation of these Supplier Code of Conduct requirements. Suppliers must also ensure that these grievance channels are accessible, confidential, and responsive to address concerns promptly and fairly.

Lantmännen collaborates with suppliers to ensure compliance with this Supplier Code of Conduct. If a supplier fails to comply with the terms of this Supplier Code of Conduct and remedial actions are not made within an agreed period, Lantmännen may, as a last resort, terminate the business relationship with the supplier. In cases when remediation for those affected is needed, Lantmännen will actively take part in supporting the remediation activities.

- Be open to reviews and audits if Lantmännen asks for site visits or document reviews.
- **Share information when needed**, like the origin of your raw materials, your risk management process and metrics you track to follow compliance and performance.
- Act when issues are found by having clear process and procedures in place including informing your partners such as Lantmännen early in the process.





# 2. Environment

Aligned with our commitment to reduce our climate emissions in line with the Paris Agreement and climate science, as well as to enhance our positive impact on nature and minimize negative impacts throughout product and service lifecycles, suppliers shall to the extent applicable to their business operations and value chain:

Reduce greenhouse gas emissions: Implementing practices to measure, manage, and reduce greenhouse gas emissions throughout the value chain, with best efforts to align with needed emissions reductions according to climate science and work towards climate neutrality by 2050. Actively work for continuous improvement in environmental performance and increase the share of fossil-free energy in its operations.

#### What does this mean for you?

- **Track your emissions** from your own operations and energy use (scope 1 and 2) and your value chain (scope 3) as defined in the Greenhouse Gas Protocol guidance.
- Set climate targets aligned with science such as Science Based Targets aiming to reduce emissions over time.
- Identify ways to lower your climate impact, such as using energy more efficiently, reducing waste and water use, switching to renewable energy and sourcing lower impact products and services.
- Collaborate with your value chain by talking with your suppliers and customers about ways to reduce emissions across the value chain and participate in industry initiatives or reporting platforms to enhance transparency.

Develop climate resilience and adaptation capabilities: Implementing strategies for robust and resilient business operations including assessing climate-related risks and adopting practices based on the outcomes to promote long-term resilience.

# What does this mean for you?

- Identify relevant climate risks by assessing how events like floods, droughts, storms, or heatwaves could affect your operations or supply chain or how changes in laws, markets, or customer expectations affect your operations as the world moves toward low-carbon solutions.
- Include climate risks in your contingency planning, such as where you buy materials or how you manage stock and logistics.
- Enhance operational resilience by adapting business practices and infrastructure to withstand

climate stresses by improving drainage and water management systems, using heat-resistant materials or climate-smart technologies and diversifying sourcing and logistics routes to reduce dependency on climate-vulnerable regions.

• **Use nature-based solutions** (if relevant) like soil health improvement and in areas close to rivers and lakes, establish natural buffer zones to prevent soil erosion and nutrient leakage to waterways.

Minimize other emissions and pollution: Actively working to reduce emissions and pollutants released into air, soil, and waterways. Minimize the use of harmful substances in all operations, ensuring safe handling, storage, and disposal to protect human health and the environment. The precautionary principle should be applied.

#### What does this mean for you?

- Identify risks and potential sources of pollution such as smoke, wastewater, or chemical use.
- **Use safer substances** where possible and aim to reduce or avoid hazardous ones when you can.
- Handle and store chemicals safely by ensuring any chemicals are clearly labelled, stored in secure containers and handled using protective gear and good ventilation and disposed using licensed ser-
- Prepare for leaks or spills by having spill kits or basic containment tools on hand in case of an accident and doing regular maintenance to check for leaks, and make sure your team knows what to do in an emergency.
- Apply precautionary principle meaning that if you're unsure whether something could be harmful, take preventive action and choose the safest option available.

Promote biodiversity: Implementing practices that promote biodiversity and reduce negative impacts on nature. Conduct business-relevant biodiversity impact assessments to identify potential negative impacts on biodiversity sensitive areas and aim to avoid and minimize negative impacts by restoring or offsetting impacts. Prioritize, manage, and track progress on managing biodiversity impacts.

- Understand your impact on nature by mapping where your operations effect natural areas, such as forests, wetlands, or coastal zones, especially areas with high conservation value.
- Avoid harm where you can by avoiding sensitive areas where possible, reducing impact if you cannot

avoid it, restoring damaged areas if needed and using offsets as a last resort.

• Promote biodiversity where possible e.g. through diverse crop rotation, agroecology, intercropping, or buffer zones in agriculture, habitat corridors or green infrastructure in industrial areas and pollution reduction to prevent runoff into aquatic habitats.

Prevent deforestation and manage land use change responsibly: Implementing practices to identify deforestation risks in the value chain and to prevent deforestation and manage land use change responsibly to minimize environmental impact and protect forests, other wooded lands and natural ecosystems.

#### What does this mean for you?

- **Identify deforestation risks** in your supply chain, like palm oil, soy, beef, or timber and focus on highrisk areas like tropical forests or peatlands.
- Commit to deforestation-free sourcing by setting a goal to avoid sourcing from land that's been recently deforested or converted and requiring the same from your suppliers.
- Check progress and stay informed by using tools like satellite imagery or supplier questionnaires to check whether land is being used responsibly.
- Require certifications like FSC, RSPO, or RTR in high-risk regions

Adopt sustainable farming practices: Supporting and adopting agricultural practices that protect biodiversity, improve soil health, and reduce the climate impact of farming, including, but not limited to, promoting diverse crop rotation, maximal soil coverage, precision and need-based crop nutrition, protection and water management practices.

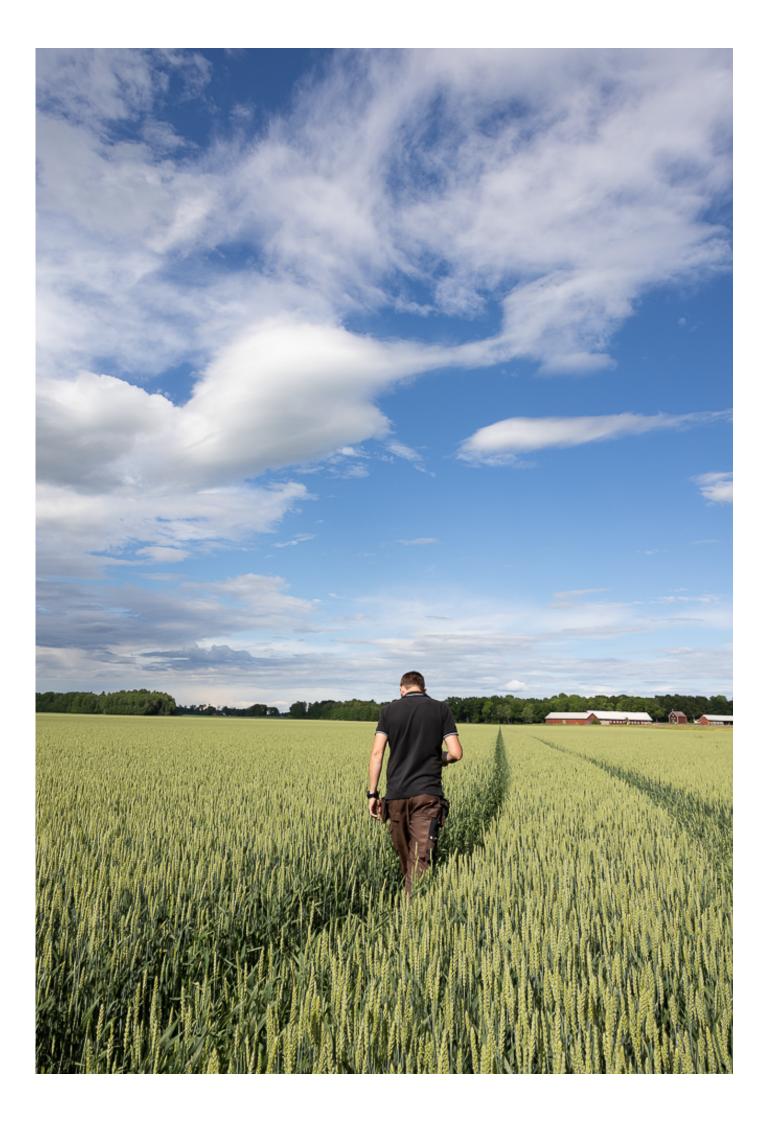
## What does this mean for you?

- Continuously train the farmers on more sustainable farming practices.
- Set targets and KPI's for more sustainable farming practices.
- Track and improve over time by monitoring indicators like soil condition, input use, and biodiversity (e.g., bees, birds, other species, threat to species extinction).

#### Strive for resource efficiency and circularity:

Optimizing the use of resources, including water and energy, and minimize waste generation, including food waste, by following the waste hierarchy of avoid, reduce, reuse, recycle. Promote recycling, the use of fossil-free, renewable and recycled resources. Embracing circular principles to extend the lifetime of products where applicable.

- Save energy and water with efficient equipment, by fixing leaks or reusing water (e.g., rainwater collection).
- Choose better materials where possible, including verified recycled or recyclable, renewable.
- Extend the life of products by designing for durability and repair, not just disposal.
- Track and improve by setting goals (e.g., "reduce packaging by 10%", "increase recycled content by xx%") and check progress.



# 3. Human Rights

Suppliers must support and respect internationally declared human rights and treat their employees and all sub-suppliers or subcontractors' workers fairly, equally and with respect.

# 3.1 Health and safety

Suppliers must ensure a safe and healthy working environment for all employees and subcontractors working for the supplier. This includes:

**Workplace safety:** Implementing a systematic approach to managing health and safety risks and to prevent accidents and injuries. Regular training and protective equipment should be provided free of charge for employees.

#### What does this mean for you?

- Establish a formal health and safety policy aligned with national laws and international standards (e.g., ISO 45001 or ILO guidelines).
- Conduct regular, preventive risk assessments to identify and evaluate workplace hazards across different tasks and areas.
- **Develop documented procedures** and assign clear responsibilities for hazard prevention and incident response.
- Track key safety metrics (e.g., incidents, nearmisses, lost time injury rate) and encourage employees to report unsafe conditions without fear of retaliation, and address concerns promptly.

**Work environment:** Providing clean, sanitary, and safe working facilities, including any accommodation provided, which must include access to clean toilet facilities and water, and, if applicable, sanitary facilities for food storage.

#### What does this mean for you?

- Set up regular cleaning and waste disposal routines
- Ensure safe food storage and eating areas by providing secure places to store food like fridges or lockers
- Maintain safe and respectful housing (if offered) with access to toilets, water, and cooking areas designed to respect privacy and dignity.
- Check conditions by doing regular walkthroughs or asking workers for feedback on facilities and fixing issues quickly and by including workers in decisions that affect their environment.

**Product safety:** Implementing a systematic approach to manage product related safety and quality risks to ensure that all products supplied meet high standards of product safety and quality, are free from food fraud by complying with internationally recognized standards.

# What does this mean for you?

- Set up a product safety and quality management system aligned with standards recognized by GFSI (Global Food Safety Initiative) such as BRCGS, ISO 22000, FSSC 22000, IFS for food/feed or ISO 9001 for general quality management.
- Make sure products can be traced by keeping records that show at batch level where your ingredients or materials come from and where they go.
- Conduct risk-based testing and audits for contaminants, allergens, and residues and conduct internal audits and supplier evaluations to identify and mitigate quality or safety risks.
- **Prevent food fraud and adulteration** by putting in place checks to avoid fraud or tampering like secure packaging and trusted suppliers.
- Train employees by offering training on food safety and hygiene for all staff and encouraging your team to speak up if they spot a risk or issue.
- Ensure incidents or complaints impacting product safety or quality are reported and acted upon.

#### 3.2 Labor practices

Suppliers must uphold fair labour practices and social conditions supporting workers' rights throughout employment in accordance with the ILO core conventions. This includes:

No child labour: Not employing children under the age of 15. Only exceptions recognized by the ILO can be accepted. The supplier commits to ensuring that young persons from 15 to 18 years do not work at night and that they are protected against conditions of work which are prejudicial to their health, safety, and development.

- Implement a clear and enforced policy against child labour.
- Always verify the age of new workers before hiring with relevant documentation using ID, school records, or birth certificates.
- Keep young workers safe by only assigning safe

tasks while enabling attendance to school.

- Raise awareness of the harms of child labour even in busy harvest season and importance of keeping children in school.
- Take responsibility if a case arises by stopping work and helping children return to school.

No slavery, forced labour or human trafficking: Strictly prohibiting the use of any form of forced or involuntary labour, or any labour linked to any form of punishment or any labour conditional to the payment of a fee and/or for handing over of personal identification documents.

### What does this mean for you?

- Implement a policy to prohibit all forms of forced labour including work performed under threat or intimidation, debt bondage or labour conditional on repayment of recruitment fees.
- Never hold worker documents including passports, ID cards or work permits.
- Don't make workers' pay fees to get or keep a job and make this clear in contracts, also with recruitment companies.
- **Use clear, fair contracts** and give every worker a written, understandable contract including pay, hours, and conditions clearly.
- Train your employees to identify signs and risks of forced labour especially in outsourced work or when hiring migrants.
- If an issue is found, act quickly to support the worker and fix the issue properly.

Fair treatment: Securing equal treatment and opportunities for all and equal pay for work of equal value. Discrimination, harassment, violence, or abuse in the workplace is not accepted. Vulnerable persons, such as young persons, new and expecting mothers and persons with disabilities, need special protection.

#### What does this mean for you?

- Implement and enforce a non-discrimination policy relating to recruitment, pay, promotion, training, job assignments, or termination based on gender, race, age, disability, religion, nationality, sexual orientation, or any other protected status.
- Train managers on how to create an inclusive and respectful environment.
- Encourage and enable workers to speak up if something feels wrong—without fear of punishment
- Support vulnerable workers by considering young workers, new or expecting mothers and people with disabilities.
- Provide a way to raise concerns confidentially and safely and make sure complaints are handled fairly and promptly.

Freedom of association and the right to collective bargaining: Respecting employees right to form or join trade unions as well as the right to collective negotiations in accordance with local legislation.

#### What does this mean for you?

- Respect the right to organize by letting workers join or form unions and don't discourage or penalize anyone for being part of a union.
- **Support collective dialogue** by being open to fair and respectful discussions and following any collective agreements that apply and allow reasonable access for union representatives to talk to workers.
- Allow alternatives where needed e.g. if unions are not allowed by law, support other ways for workers to be represented, like worker committees, safety or suggestion groups or elected spokespeople.

Fair wages: Wages and benefits paid for a standard working week must meet, at a minimum, national applicable legal standards and collective agreements. In any event, wages should always be enough to meet basic needs and to provide some discretionary income. All workers shall be provided with written and understandable information about their wages each time that they are paid.

# What does this mean for you?

- Pay at least the legal or agreed minimum whichever is higher.
- Assess pay sufficiency in relation to local cost of living.
- Provide workers with an understandable, written pay slip that shows hours worked, pay rate, overtime and any deductions.
- Pay on time and avoid unfair deductions.
- **Review and support fair pay** by checking regularly for any unjustified pay issues or gaps between employee groups.

Decent working hours: Guaranteeing decent working hours for workers by applying the national legislation, industry benchmark standards and collective agreements in accordance with the international framework set out by the ILO, and to promote working hour practices that enable a healthy work-life balance for workers.

- Follow legal and industry limits, ensuring no more than 48 standard working hours per week, ensuring at least one day off per week.
- **Keep overtime fair and voluntary** by only using overtime only when really needed, and having it voluntary, paid and not used as a regular fix for understaffing.

- **Support work-life balance** by planning sufficient rest time, avoiding long periods without a day off or unpredictable shifts.
- Track working hours clearly and make records available to employees.
- **Provide training to management** about fair scheduling and avoiding overwork.

Regular employment provided: To extent possible work performed must be based on recognized employment relationship established through national law and collective agreements avoiding precarious work and unjustified fixed term or limited hours contracts.

## What does this mean for you?

- **Use written employment contracts** including key details like job role, hours, pay, and notice period.
- Use fixed term or part-time contracts only for short-term or seasonal needs, avoiding using unjustified repeated short contracts to avoid permanent employee rights.
- Avoid insecure job setups like zero-hour contracts or outsourcing without clear responsibility for workers.
- •Track employment types by recording permanent, temporary, or contract terms.

# 3.3 Indigenous communities

Suppliers shall respect the free, prior and informed consent of indigenous communities prior to the beginning of development on ancestral land or the use of resources in an indigenous population's territory.

- Check for indigenous land or communities before starting any project, check if indigenous peoples live nearby or use the land.
- **Communicate with respect** by talking to indigenous groups through their chosen representatives, respecting traditional leadership and knowledge systems.
- Make written agreements explaining what was agreed to, how benefits will be shared and how concerns will be handled.
- $\bullet$  Monitor activities to ensure agreements are followed.





# 4. Business Conduct

# 3.1 Business Ethics

Suppliers must conduct business ethically, with integrity, and establish and maintain policies, procedures, and internal controls to prevent, detect, and address unethical business practices. This includes:

Anti-corruption & anti-bribery: Suppliers shall not engage in any form of bribery, corruption, extortion, or embezzlement. Suppliers must not offer, promise, give, or accept any form of improper payments, gifts, or advantages in dealings with public officials or private sector partners.

Fair competition: Suppliers shall conduct their business in accordance with fair competition principles and must not engage in any practices that violate competition regulations and laws, such as price-fixing, market allocation, bid-rigging, or other anti-competitive practices.

**Anti-money laundering:** Suppliers must have appropriate measures in place to prevent and detect money laundering and terrorist financing.

**Trade sanctions:** Suppliers must comply with all applicable trade sanctions, export control laws, and embargo regulations imposed by relevant authorities and implement appropriate due diligence measures to prevent violations of such regulations

Conflicts of interest: Suppliers must disclose any actual or potential conflicts of interest in their business dealings with Lantmännen. Any personal relationships, financial interests, or other situations that may create an appearance of impropriety must be reported and managed correctly and with transparency.

## What does this mean for you?

Use a risk-based approach and methods aligned with your business environment to comply with business ethics requirements. Examples of how to comply include, but are not limited, to the following activities:

Implement documented policies and procedures

that explicitly prohibit bribery and corruption, money-laundering and that ensures responsible interactions with competitors.

- **Provide regular training** to all relevant employees, contractors, and agents on such policies and procedures.
- **Perform risk based due diligence** on business partners to ensure they do not engage in prohibited conduct on your behalf and to verify that they are not listed on sanctioned party or restricted entity lists.
- **Document conflict-of-interest disclosures** and the steps taken to address them so that they can be reviewed in audits or investigations.

Accounting & auditing: Suppliers must maintain accurate and transparent records of business activities and comply with all applicable regulatory reporting requirements and generally accepted accounting principles and standards.

- Maintain complete, accurate, and timely records of all business transactions in accordance with applicable laws, regulations, and generally accepted accounting principles.
- **Ensure transparency** in financial reporting by recording transactions truthfully and in sufficient detail to allow for proper verification and audit.
- **Implement internal controls** to safeguard the integrity of financial information, prevent fraud, and detect errors.
- **Retain records** for the period mandated by applicable laws and company policy to facilitate regulatory reviews and audits.
- Prohibit the creation of undisclosed or "off-thebooks" accounts and ensure that no transactions are conducted without proper recording and authorization.

## 3.2 Animal welfare

Suppliers of animal-based products shall maintain policies and procedures ensuring and monitoring of animal welfare which encompasses the well-being of the animal, (animal health) and the animal's perception of its situation (animal welfare).

**Animal health:** Suppliers shall take preventive actions against animal illness and unhealthy animals shall receive proper and timely treatment.

#### What does this mean for you?

- Create an animal welfare policy and set clear practices for animal health, housing, transport, and handling.
- Keep animals healthy by using preventive care such as vaccinations and regular health checks and treating sick or injured animals quickly and keep them separate if needed to avoid suffering or spreading illness.
- **Provide good living conditions** by giving animals enough space, clean bedding, fresh water, and proper feed.
- Train employees and monitor practices to ensure proper conditions and handling of animals.

Animal welfare: Animals shall be free from hunger and thirst, discomfort, pain, fear and stress. Animals' freedom to express normal behaviour shall be respected. Ill or improper treatment of animals causing fear, stress or pain is not acceptable.

### What does this mean for you?

- Follow the Five Freedoms by making sure animals have fresh water and good nutrition, comfortable shelter and protection from pain and illness as well as space to move and behave naturally and a calm, low-stress environment.
- Let animals show natural behaviours and avoid long-term use of tight confinement.
- Never allow abuse, neglect, or rough handling, instead use humane practices during handling, transport, and slaughter.
- Train employees and promote a culture of respect and empathy for animals.

# 5. Get help

Need to Raise a Concern? Here's how to get help
• If you see or hear about something that may go
against the law or Lantmännen Supplier Code of

- Conduct, it's important to let us know.
   You can raise your concern by speaking to your main Lantmännen contact or contacting any Lantmännen manager or director.
- Lantmännen will investigate all concerns confidentially and seriously.

