

CODE OF CONDUCT FOR EMPLOYEES

For economic, social and environmental responsibility

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CONTENTS

Checklist 3

About the Code of Conduct 5

Guiding principles 6

Our Shared Responsibility 7

Sustainable business 8

Business ethics 9

Communication 11

Deviations from the Code of Conduct 12

Checklist

YOUR RESPONSIBILITY – ASK YOURSELF

- Is my behavior/actions legal, fair and ethical?
- Is my behavior/actions compatible with Skånemejerier's purpose, business idea and values?
- Is what I am doing safe for our business, our employees, customers and partners?
- Would a customer, colleague or my manager consider my behaviour appropriate?
- Could my behavior/actions damage Skånemejerier's reputation and brand?
- Am I prepared to question something that I think is wrong and do I welcome being challenged by others?

Do you want to raise an issue or discuss a behavior/action? Contact your immediate manager or HR! You can also use the whistleblower platform Lact@lert.

As a large food company, we have a responsibility – not only for our products, but also for how we act towards each other, our customers and society. Our Code of Conduct is an essential tool that helps us make the right decisions and act with integrity and trust in all situations.

By following the Code of Conduct, we show respect for laws, people and the environment. It provides us with guidance in everyday life and ensures that together we build a safe, sustainable and successful business. I urge everyone to read the code carefully, understand it, and live by it – every day.

Together we make a difference.

Cecilia von Perglas, VD SKÅNEMEJERIER

ABOUT THE CODE OF CONDUCT

With our strong position as a food company comes great responsibility. At Skånemejerier, we therefore have a Code of Conduct and a set of values that help us act responsibly and take a stand in situations where we have to make our own assessments.

Our Code of Conduct applies to all employees and also to part-time employees, consultants and employees with other types of fixed-term contracts. It is important that each of us reads and understands the Code of Conduct and acts in accordance with its principles.

By acting respectfully and wisely in relation to the company and to each other, we build a successful business and a workplace to thrive in.

How to use the Code of Conduct

EMPLOYEES

As an employee, you have a responsibility to read and understand the Code of Conduct. Together with your personal integrity, the Code of Conduct should serve as a basis for your work. The Code of Conduct forms part of your employment contract and violations may result in disciplinary action.

MANAGER AND LEADER

As a manager and leader, you have a special responsibility to lead by example. You should therefore have a particularly good understanding of the content of the Code of Conduct. You have a responsibility to act in accordance with the Code of Conduct, but you must also be able to discuss it with your team continuously and if necessary.

Talk to your immediate manager or HR if you feel that something in the Code of Conduct is unclear or difficult to understand.

GUIDING PRINCIPLES

LAWS, RULES AND POLICIES

Skånemejerier must always respect applicable laws, rules and regulations regardless of where the business is conducted. The Code of Conduct is supplemented by our internal policy documents.

BUSINESS IDEA AND VALUES

The work conducted within Skånemejerier shall contribute to our business idea, and be based on our values: ambition, commitment and simplicity.

BUSINESS IDEA

We nurture the future by developing and producing really good food that both tastes and does good.

VALUES

AMBITION

We work according to common and individual goals to develop as a company and as people. We look ahead and think that nothing is so good that we can't do better.

COMMITMENT

We act as entrepreneurs and are responsible and loyal. We are passionate about our work and do everything possible to achieve our ambitious goals.

SIMPLICITY

We are accessible, open, transparent and pragmatic. We don't make things harder than they need to be.

OUR SHARED RESPONSIBILITY

EMPLOYEES

The well-being of our employees in the workplace is crucial to our business. Our employees are the company's most important asset and best ambassadors. We will therefore work continuously together to create the best possible workplace and a work culture based on well-being, commitment, health and safety. We shall always act in accordance with applicable labour law legislation and in accordance with the guidelines in Skånemejerier's internal policies. We expect every employee to understand their role and responsibilities, to act in accordance with our Code of Conduct and our values, and thus contribute to achieving our business idea.

SUPPLIERS AND PARTNERS

In order for us at Skånemejerier to be able to contribute to a sustainable development, it is not enough that we make demands on ourselves. We must also ensure that our suppliers and partners conduct their work in a responsible and sustainable way. Our ambition is for our suppliers to comply with the Lactalis Group's Code of Conduct for Suppliers. If you as an employee receive information that a supplier or partner is in breach of this, it must be reported through Lact@lert.

OUR CUSTOMERS AND CONSUMERS

By complying with applicable legislation, good business ethics and this Code of Conduct, we act responsibly towards customers and consumers. We will offer high-quality products developed in a sustainable way. We must provide our customers with sufficient and relevant information about our company and our products, and the products must be provided with information that makes it easy for consumers to make up their minds. With well-functioning routines, we ensure efficient and good communication with both customers and consumers, including handling of comments and questions.

OUR COMPETITORS

Skånemejerier cares about the diversity of the Swedish dairy market. This means that we will compete with integrity and never comment on competitors' products and services in an incorrect or unethical way. We shall also act in accordance with applicable competition laws, which state, among other things, that we shall not enter into any agreement, whether formal or non-formal, with a competitor regarding pricing or other sales-related activities such as division of sales territories or allocation of customers.

SOCIAL ACTOR

Skånemejerier must be a responsible social actor that leads by example. We continuously nurture and evaluate our role in society and the people and environments we come into contact with in our operations. It is our ambition to contribute to a sustainable society, which is also expressed in our vision and business idea and the approaches that emerge in this Code of Conduct.

SUSTAINABLE BUSINESS

By getting involved in issues related to the work environment, safety and equal treatment, you can, regardless of your professional role, contribute to a sustainable workplace.

OCCUPATIONAL SAFETY AND HEALTH

Skånemejerier prioritizes the work environment, health and safety for everyone who works with us. We want our employees to thrive and feel good, which is why we work preventively and continuously to create a safe and secure workplace.

Through systematic work environment management, we continuously take measures to prevent workplace accidents and work-related injuries. Incidents and deviations in the workplace must be reported through our work environment system, to your immediate manager or to a safety representative. You also have a responsibility to react and report to your immediate manager if you see behaviour that is not in line with our values.

At Skånemejerier, we carefully follow up occupational injuries and sick leave and draw up rehabilitation plans for those who have been ill for a long period. Skånemejerier's workplaces must be alcohol- and drug-free.

DIVERSITY AND EQUAL TREATMENT

Skånemejerier's workplaces must be characterised by an inclusive and respectful work environment. All employees have the same rights, opportunities and obligations – regardless of gender, transgender identity or expression, ethnicity, belief, disability, sexual orientation and age.

As an employee, you have a responsibility to promote and contribute to a positive work environment where everyone feels included, appreciated and respected. There is zero tolerance for disrespectful behaviour, bullying, discrimination, harassment and molestation.

TRADE UNION ACTIVITIES AND FREEDOM OF ASSOCIATION

Skånemejerier respects the right of association, which is a right for employers and employees to belong to employer and employee organizations. As an employee, you have the right to form and belong to such an organization, as well as to work within them and make use of your membership.

DUTY OF LOYALTY

At Skånemejerier, a duty of loyalty applies to all employees. The duty of loyalty is part of the employment contract and requires that you observe the employer's interests even during a notice period. As an employee, you should avoid situations where you risk not

being loyal to, or even harming, your employer. You must also voluntarily inform the employer of things that may be needed for the business to function.

Secondary occupations

Secondary occupations refers to any activity that an employee has in addition to their employment at Skånemejerier and that is not only part of their private life. Every employee who has a secondary occupation must receive written approval from their immediate manager. Managers with personnel responsibility must receive written approval from the HR director. Secondary occupations that are detrimental to work, damage to trust or compete are not permitted.

AFFAIR

We shall of course follow good business ethics in our operations and in connection with business transactions. We shall prevent Skånemejerier from becoming involved in any form of money laundering, financing of terrorism and other forms of illegal activities.

COMPANY ASSETS

Skånemejerier has both tangible assets (e.g. raw materials, finished products, machinery and equipment) and intangible assets (e.g. trademarks, patents and know-how). We shall always use our assets responsibly and appropriately and protect them against theft, loss, misuse and damage.

DOCUMENTATION AND REPORTING

Our corporate data, financial or otherwise, must accurately reflect information, transactions, and events. It is important that reporting and documentation are truthful, reliable and complete. We must never destroy or alter such information that must be retained for contractual, accounting or other legal purposes, or that may be required for any future audits or investigations.

We shall record all financial transactions in a complete and accurate manner in accordance with applicable accounting policies, laws, and documentation requirements. This means, among other things, that all income, costs and expenses must be reported in Skånemejerier's accounting system, with all necessary verifications and documentation. Skånemejerier comply with applicable laws and regulations in the countries we operate and pay taxes in accordance with these.

BRIBERY AND CORRUPTION

It is never allowed to use illegal or immoral business methods, such as bribery or other forms of corruption, within Skånemejerier.

Skånemejerier and its employees may not, directly or indirectly, offer, request or accept gifts, promises, donations, gifts, payment in cash or other benefits, bribes or improper benefits for the possible purpose of influencing business or benefiting oneself, others or the company.

An offer of hospitality or a gift may be accepted or made only if it is reasonable and appropriate and within the framework of fair business practices and provided that it does not constitute or can be construed as a bribe or improper advantage. The representation or gift must not be unethical or infringe on the recipient's privacy.

A gift or other benefit may have only a small value and must never influence the conduct or decision-making of the giver or recipient. As an employee, you must ask for

formal approval if in doubt. Via the document "Gifts and Hospitalities LactaRules", which is available on our intranet, a form can be used for formal approval by the manager or CEO regarding gifts and entertainment. If you are uncertain about gifts, entertainment or other benefits, contact your manager or the company's legal representative.

CONFLICTS OF INTEREST

A conflict of interest can arise if a personal interest conflicts with Skånemejerier's interest. Skånemejerier's decisions must not be influenced by personal interests such as personal gain, family or friendship or other considerations that are not relevant to the business. If there is a risk of a conflict of interest, you as an employee must always inform your immediate manager.

SENSITIVE INFORMATION AND PRIVACY

Protecting our ideas, innovations and business information is crucial for our competitiveness and the trust of our stakeholders. Confidential information includes sensitive and non-public information such as trade secrets, business plans, financial information, details of projects and innovations, pricing information and contract content, as well as information about investigations and possible disputes. Sensitive information that we have received from external parties such as suppliers, customers and consumers is also considered confidential.

All employees have a responsibility to treat confidential information with confidentiality and to take steps to prevent confidential information from being made available to persons who do not need or have the right to this information. We must always carefully consider how, where, and with whom business-related issues are discussed.

If employees receive or disclose confidential information by mistake, the employee must contact the sender/recipient, inform their immediate manager and refrain from using the information received.

We are committed to protecting personal data that the company receives. We comply with applicable laws that exist to protect the privacy of individuals and the processing of personal data.

PHOTO RESTRICTIONS AT OUR FACILITIES

We have a general ban on photography and film at all our facilities. Special permission for photographing or filming can be granted by the Quality Director, Industrial Director, Plant Manager, Communications Director and CEO. In the event of an incident at a facility or to register the need for maintenance, no permit is required to photograph and film with the company's mobile phone.

Photography and filming of individuals (unless they have written consent) must be avoided as it may be in conflict with, among other things, personal data legislation. All photography and filming must be done with the company's equipment. Due to food safety and hygiene aspects, private mobile phones and other recording equipment are not allowed at our production sites.

COMMUNICATION

EXTERNAL COMMUNICATION

External communication is an important part of our marketing and branding efforts and includes communication aimed at existing and potential customers, partners, suppliers and other stakeholders. Examples of channels for external communication are media contacts, press releases, social media, publications, advertising and public presentations. To maintain our trust, we should always express ourselves with integrity and our communication should be accurate and reliable.

An employee who communicates externally in his or her professional role, for example to the media or on social media, will always be seen as a representative of the entire Skånemejerier company. Therefore, all such communication must be in line with Skånemejerier's values and be compatible with how we communicate in other channels. Employees are encouraged to refer contacts from the media to the company's communications director.

SOCIAL MEDIA

Social media are important communication channels for Skånemejerier because they are platforms that provide proximity to our consumers. As an employee, you are welcome to get involved in marketing our brands, products and companies on social media, for example by following Skånemejerier on LinkedIn, Facebook and Instagram and sharing positive news about our business. Only a few people in the company are official spokespeople for the company and its brands. If you are not one of them, you need to make it clear that you are speaking for yourself and not for the company.

If you are unsure, please contact our communications director or your immediate supervisor.

DEVIATIONS FROM THE CODE OF CONDUCT

It is the responsibility of both employees and management to ensure the compliance of our Code of Conduct. All employees are encouraged to report actions that, according to personal assessment, are not in accordance with the Code of Conduct. You can report to your immediate manager or HR, or via the Lactalis Group's whistleblower platform Lact@lert.

A manager who receives a report must, if there is reasonable suspicion of conduct that is in conflict with the Code of Conduct, contact the HR Director. All reports received by HR are evaluated and, if necessary, an internal investigation is conducted.

Employees can also report violations or actions in violation of law, policy or our Code of Conduct via the whistleblower service "Lact@Lert", which is a secure and confidential reporting system. Reporting may be done anonymously. Anyone who blows the whistle in good faith is protected by confidentiality regarding their identity and against retaliation, disciplinary action and other pressure.

Link to "Lact@Lert"

HR is responsible for revising the content of the Code of Conduct if necessary. If you have any questions, please contact your immediate manager or HR.