

# Supplier Code of Conduct

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Approved by the President and CEO of Luossavaara-Kiirunavaara AB (publ). Effective as of 1 January 2026.

## Supplier Code of Conduct

Dokumentinformation	
Type of steering document:	Group Guideline
Approved by:	President and CEO, LKAB
Date of approval:	2025-12-19
Effective as of:	2026-01-01
Responsible function:	Director of Sustainability
Applicable for:	LKAB Group

Revisionslogg		
Date	Kommentar	Language
2025-12-19	Version 1 – revision of previous policy, adapted to the new governing document template.	Svenska, English

# 1. Introduction, Purpose and Scope

## 1.1 Introduction and purpose

As a state-owned company, LKAB shall conduct its operations on a commercial basis, sustainably and in an exemplary manner, in accordance with the Swedish State's Ownership Policy. This means that LKAB shall respect human rights and promote sustainable development, and work to ensure that these principles are respected and applied by the Company's suppliers and contractual partners.

To fulfil the requirements of the State's Ownership Policy and international guidelines, LKAB is guided by internal governing documents, including a Code of Conduct for employees, a Sustainability Policy, and Group Guidelines for procurement, human rights and anti-corruption. This Supplier Code of Conduct complements these documents by setting out LKAB's requirements for responsible business Conduct for suppliers and within the supply chain.

LKAB considers compliance with this Code as a means of ensuring mutual efforts within the areas covered by the Code. Through cooperation and transparency, we can together contribute to strengthening sustainability, respect for people, and responsible business conduct throughout all stages of the value chain.

## 1.2 Scope

This Supplier Code of Conduct (the "Code") constitutes a contractual appendix and forms an integral part of the contractual relationship between LKAB and its suppliers. The Code sets out requirements that each supplier is obliged to fulfil to establish and maintain a business relationship with LKAB. These requirements include compliance with applicable laws, internationally recognised labour and human rights standards, environmental protection, responsibility towards local communities, and business ethics.

The Code applies to all suppliers of goods and services (including contractors) to LKAB, regardless of size, geographical location or industry. The requirements apply to the supplier's own operations as well as to the business relationships involved in the supplier's delivery of products or services to LKAB.

## 1.3 Application and Responsibility in the Value Chain

By entering into the agreement, of which this Code constitutes a contractual appendix, the Supplier commits to:

- Ensuring compliance with the requirements of the Code within its own operations.
- Communicating and actively promoting compliance with the Code throughout the value chain, in a manner that is reasonably proportionate to the nature of the operations, the level of risk, and the degree of control.

For the purposes of this Code, the "Value Chain" refers to the activities related to the production of goods or the provision of services by the Supplier to LKAB, including the development of the product

or service, as well as the use, transport and end-of-life management of the product, and the related activities of the supplier's upstream and downstream business partners.

The application of the Code shall be carried out in accordance with the principles of due diligence, as further described in Section 3.

## 2. Legal Requirements and International Standards

### 2.1 Compliance with Laws and Regulations

The Supplier shall comply with all applicable laws, rules and regulations in the countries in which the supplier operates. This includes, but is not limited to, laws and regulations relating to labour and employment conditions, occupational health and safety, environmental protection and resource use, competition law, human rights, anti-corruption, and taxation.

### 2.2 Compliance with International Standards

The Supplier shall respect and act in line with internationally recognised standards. The following internationally recognised frameworks form the basis for LKAB's expectations of suppliers:

- **ILO core conventions** – The ILO's eight core conventions concerning forced labour, freedom of association and the right to collective bargaining, the abolition of child labour, and non-discrimination in employment and occupation.
- **OECD Guidelines for Multinational Enterprises** – guidance for responsible business conduct in global value chains.
- **UN Guiding Principles on Business and Human Rights (UNGPs)** – the expectation that companies respect human rights through due diligence.
- **UN Global Compact** – the ten principles relating to human rights, labour standards, environmental responsibility, and anti-corruption.
- **UN Convention against Corruption** – a convention establishing international requirements to prevent, detect, and combat corruption, including bribery, embezzlement, undue influence, and money laundering.

The frameworks listed above are not exhaustive. The Supplier shall also take into account and, where applicable, act in line with other internationally recognised standards and guidelines that are relevant to its own operations.

## 3. Requirements for Suppliers

In addition to the requirements set out in Section 2, this chapter sets out the specific requirement areas that are of particular significance to LKAB's operations and to our relationship with our suppliers. These requirements may also form the basis for audit and follow-up in accordance with Section 4

### 3.1 Due Diligence Requirements in the Value Chain

The Supplier shall work systematically and on a risk-based basis to conduct due diligence in accordance with international standards (see Section 2.2). This work shall cover the Supplier's own operations and the Value Chain.

For the purposes of this Code, due diligence refers to a structured and ongoing approach whereby the Supplier identifies, assesses, prevents and mitigate actual and potential adverse impacts on people, working conditions and the environment, and addresses shortcomings in compliance with ethical principles. This work shall include clear governance and accountability, risk assessments, measures to prevent and manage risks, follow-up of the effectiveness of measures, and processes to receive and handle grievances. Due diligence shall be carried out to the extent justified by risk, impact and the degree of control.

If the Supplier causes or contributes to adverse impacts as described above, the Supplier shall, without undue delay, cease or limit the impact and take appropriate measures to remedy the adverse impact for the affected parties. The Supplier shall work openly and constructively together with LKAB to develop processes and improve compliance in the value chain.

### 3.2 Occupational Health and Safety

The Supplier shall ensure a safe and healthy working environment for its employees. This includes, among other things that:

- Occupational health and safety risks shall be identified, prevented and managed systematically.
- Work shall be carried out in accordance with applicable laws, regulations and international health and safety standards.
- Personnel shall receive relevant training and personal protective equipment.
- Accidents and incidents shall be reported and investigated in order to prevent recurrence.

Suppliers performing work within LKAB's industrial areas in Kiruna, Svappavaara, Malmberget and the Port of Luleå (Malmhamnen) shall also comply with LKAB's Supplier Handbook<sup>1</sup>.

### 3.3 Human Rights and Working Conditions

The Supplier shall respect internationally recognised human rights and labour standards. This includes:

- The Supplier shall comply with the ILO Core Conventions, including prohibitions on child labour, forced labour and discrimination.
- Workers shall have the right to freedom of association and collective bargaining.
- Workers shall not be subject to retaliation, disciplinary measures or other improper treatment for exercising their rights under this section, applicable law or collective bargaining agreements, or for raising concerns or submitting complaints in good faith.

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<sup>1</sup> The Supplier Handbook is available at [www.lkab.com](http://www.lkab.com) and is updated regularly

- The Supplier shall ensure decent working conditions, including reasonable working hours, rest, and fair remuneration in accordance with national law or applicable collective bargaining agreements.
- The Supplier shall prevent harassment and other improper treatment at and in connection with the workplace.

### 3.4 Environment and Climate

The Supplier shall identify, prevent, mitigate and, where relevant, remedy adverse impacts on the environment and the climate. This includes:

- The Supplier shall comply with applicable environmental legislation and standards.
- Environmental risks shall be continuously identified, prevented and managed systematically.
- The Supplier shall promote increased resource efficiency and take into account the waste hierarchy in order to minimise emissions to air, land and water and to reduce waste volumes.
- The Supplier shall work to protect local biodiversity and ecosystem services, including by using water in a responsible and conscious manner and by avoiding the use of previously undeveloped land.
- The Supplier shall work towards continuous improvement of environmental performance, including energy efficiency and reduced climate impact, and the phasing out of fossil energy in production and transport.

### 3.5 Minerals from Conflict-Affected and High-Risk Areas

For the purposes of this Code, High-Risk Minerals means tin, tantalum, tungsten and gold ("3TG"), as well as other minerals or metals that may originate from conflict-affected and other high-risk areas, as these terms and risks are described in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

If the Supplier knows, or should reasonably know, that goods, components or materials supplied to LKAB include high-risk minerals, the Supplier shall ensure a risk-based approach to prevent and manage risks related to such minerals in relevant parts of the Value Chain. This includes that the Supplier shall:

- Identify whether the Value Chain includes high-risk minerals from conflict-affected or other high-risk areas and, where this is the case, conduct risk-based due diligence in accordance with the OECD guidance referred to in the definition above or other equivalent methodology.
- Take risk-based measures to prevent high-risk minerals from being linked to the financing of, or other support to, armed groups or other actors involved in conflicts or serious human rights abuses.
- Maintain traceability in relevant parts of the Value Chain, for example to the smelter or refinery, and upon request be able to demonstrate origin, due diligence performed and measures taken, where necessary supported by established industry tools and third-party review.

### 3.6 Business Ethics and Integrity

The Supplier shall conduct its business with high integrity and in accordance with applicable laws and internationally recognised norms for business ethics. This includes that:

- Bribery, corruption, extortion, improper payments and conflicts of interest are prohibited. No improper or undue advantage may be offered, promised or given, nor may it be requested, demanded or accepted, for the purpose of influencing business decisions or the exercise of public authority.
- Gifts, hospitality and other benefits may only be offered or accepted if they are moderate, transparent and have a legitimate business purpose. They must not create, or be perceived to create, dependency, a sense of obligation or undue influence on the business relationship.
- The Supplier shall comply with applicable competition law and anti-money laundering laws and regulations.
- Business relationships and financial transactions shall be documented accurately and transparently.
- The Supplier shall safeguard confidentiality and protect sensitive information, including personal data.

### 3.7 Local Communities and Stakeholders

The Supplier shall respect the rights and interests of communities and Indigenous Peoples affected by the operations. This includes that:

- The Supplier shall engage in good-faith dialogue with local communities and Indigenous Peoples, as well as other affected stakeholders impacted by the operations, in order to understand and address risks and impacts.
- The rights of Indigenous Peoples shall be respected in accordance with applicable legislation and international standards, including the principle of free, prior and informed consent (FPIC), to the extent applicable.
- The Supplier shall avoid contributing to adverse impacts on communities, Indigenous Peoples or affected stakeholders and, where necessary, cooperate in measures to remedy such impacts.

## 4. Implementation, Monitoring and Compliance

The Supplier is responsible for implementing and complying with the requirements set out in the Code. LKAB may monitor and verify the Supplier's compliance with the Code through dialogue, requests for information, self-assessments, document reviews and, where necessary, on-site visits or audits. The purpose is to ensure that the principles of the Code are applied in practice and to identify needs for improvements and, where relevant, support. The Supplier shall actively cooperate in such monitoring activities. When conducting monitoring activities, LKAB will apply a proportionate approach, taking into account the Supplier's size, the nature and scale of its operations, the level of risk and the degree of control.

Monitoring, verification of compliance with the Code and, where required, support for implementation may include, for example:

- **Information and Self-Assessment**

The Supplier shall, upon request, provide information and documentation demonstrating how the Code is complied with. This may, for example, include information on governance, risk assessments, measures, monitoring and the handling of complaints. LKAB may also request that the Supplier carry out self-assessments or equivalent reviews.

- **Site Visits and Audits**

LKAB has the right to monitor the Supplier's compliance with the Code through document reviews, site visits or audits, carried out by LKAB or by an independent third party. The Supplier shall also actively facilitate that LKAB, or LKAB's designated representative, can carry out such audits efficiently and in a manner that yields meaningful results.

- **Cascading Requirements**

The Supplier shall be able to demonstrate that documented and effective processes are in place to ensure compliance with the Code, or equivalent requirements, in the supply chain. This includes integrating these or equivalent requirements into contracts, purchasing routines and the monitoring of sub-suppliers in a manner that is reasonably proportionate to the risks. The Supplier shall ensure that sub-suppliers are informed of these or equivalent requirements and commit to comply with them. The Supplier shall actively work to ensure that, where necessary, sub-suppliers cooperate in LKAB's follow-up activities, whether carried out by LKAB or by a representative designated by LKAB, for example through document reviews, interviews, site visits or audits.

- **Corrective Actions and Sanctions**

The Supplier shall address any identified non-conformance with, or deviation from, the Code through an agreed and time-bound action plan. The Supplier shall implement the measures under the action plan at no additional cost to LKAB. Sanctions for breaches of the Code are governed by the agreement between LKAB and the Supplier.

- **Management Systems and Continuous Improvement**

The Supplier shall have management systems or equivalent structures to identify, prevent, manage and monitor risks related to occupational health and safety, human rights, the environment and business ethics. The systems shall enable traceability, documentation and learning. The Supplier shall be able to demonstrate how improvement efforts are managed and monitored over time to a proportionate extent.

## 5. Reporting Suspected Breaches and Misconduct

The Supplier shall, without undue delay, inform LKAB of serious breaches of the Code. The Supplier shall ensure that accessible and reliable mechanisms are available that enable employees and other stakeholders to report suspected breaches of the requirements of the Code or other misconduct anonymously, without risk of retaliation.

If the Supplier does not have its own system for reporting misconduct, the Supplier shall inform relevant employees and other relevant stakeholders that anonymous reporting is available through LKAB's whistleblowing system, SpeakUp. Information about SpeakUp and how to submit a report is available on LKAB's website, [www.lkab.com](http://www.lkab.com).



## **6. Guidance and Contact Information**

For any questions or guidance regarding the use of this document, please contact your LKAB Procurement contact or LKAB's Environment and Sustainability function. The function can be reached by post (LKAB, Box 952, SE-971 28 Luleå, Sweden), by phone on +46 (0)771-760 000, or by email at [info@lkab.com](mailto:info@lkab.com).