

Modern slavery statement 2024

1. Introduction

Lindex is committed to respecting Human rights in its own operations and throughout the value chain. In line with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, Lindex is dedicated to upholding internationally recognized human rights, including civil, political, economic, social, and cultural rights, labour rights, and the rights of vulnerable individuals and communities.

Modern slavery, as defined in the UK Modern Slavery Act 2015, includes slavery, servitude, forced or compulsory labour, and human trafficking — all of which involve the control, coercion, and exploitation of individuals, often for profit. This is a serious violation of human rights and a global issue affecting millions of people.

Lindex is committed to ensuring that there is no modern slavery or human trafficking in any part of its value chain. While Lindex acknowledges its responsibility to combat both actual and potential risks of modern slavery across the entire value chain, particular focus is placed on the risk of forced labour in the supply chain.

Lindex complies with the UK Modern Slavery Act and publishes an annual slavery and human trafficking statement on its website. This statement outlines the steps taken during the financial year 2024 to address modern slavery within the company's supply chain and own business operations.

2. Organisation structure and supply chains

Lindex is a fully owned subsidiary of Lindex Group and one of Europe's leading fashion chains, with approximately 440 stores across 16 markets and 4,300 employees. The assortment includes several different concepts within womenswear, kids wear, lingerie and cosmetics.

The Head Office is located in Gothenburg, Sweden, where functions such as design, purchasing, IT, communication, and marketing are managed. In 2024, Lindex launched an Omnichannel Distribution Centre in Sweden, serving stores, customers, and B2B partners.

Geographic presence

- **Stores:** Lindex have stores in Sweden, Norway, Finland, Czech Republic, Slovakia, Latvia, Lithuania, Estonia, and the United Kingdom.
- **Country Offices:** Our country offices in Finland, Norway, and the Czech Republic support business operations, including controlling, merchandising, and human resources.
- **Production Offices:** Operated in Bangladesh, China, Hong Kong, India, and Turkey. These offices work closely with the design and buying teams to ensure quality, fit and sustainability standards are met.

Lindex value chain

The Lindex value chain covers all business activities from design and sourcing to manufacturing, sales, consumption, and post-consumer processes such as disposal, recycling, reuse and resell. This includes the entire supply chain, internal operations, and product lifecycle.

Lindex supply chain structure

Lindex does not own any factories but works with independent suppliers. To clarify different stages of the supply chain, the following tier system is used:

- **Tier-1 Assembly and manufacture of final products:** Facilities involved in the assembling and manufacturing of final products (including vertically integrated).
- **Tier 1 Processing mills:** Facilities involved in the additional processing during assembly of final products.
- **Tier 2 - Material Production:** Facilities involved in the manufacturing and processing of fabric, trim and other components
- **Tier 3 - Raw Material Processing:** Facilities where raw materials are processed into yarn and other intermediate products such as fibre processing, yarn spinning etc.
- **Tier 4 - Raw Material Production:** Extraction, farming and/or production of raw materials.

3. Human rights and governance policies

Lindex has established a Human Rights Policy aligned with international standards including the Universal Declaration of Human Rights and the ILO Core Conventions. The policy outlines commitments to safe workplaces, adequate wages, and the prohibition of child and forced labour, and human trafficking.

It forms the foundation of Lindex approach to human rights across the entire business. The policy applies to all individuals affected by Lindex's operations including the company's own employees, value chain workers, business partners, and communities.

- Conducting dynamic human rights due diligence (HRDD) to identify, prevent, mitigate, and remediate human rights impacts.
- Focusing on protecting vulnerable groups, including women, minorities, migrant workers, and children.
- Embedding human rights considerations into business management and operations.

In 2024, Lindex updated the Human Rights Policy based on stakeholder feedback and to ensure alignment with the company's salient human rights issues. The Speak-Up Policy was also introduced to strengthen the company's grievance mechanism.

Speak up policy

To strengthen Lindex commitment and adherence to the Human Rights Policy, the Speak Up Policy ensures a safe and accessible grievance mechanism for all stakeholders – employees, suppliers, workers in the value chain, and affected communities. This enables anyone to report concerns regarding potential human rights violations or unethical behaviour.

Key steering documents for supply chain:

- **Supplier Code of Conduct** – Aligned with international frameworks (e.g., ILO Core Conventions, UN Guiding Principles on Business and Human Rights), the code outlines mandatory requirements for safe working conditions, fair wages, gender equality, and the prohibition of forced and child labour. The code of conduct states that modern-day slavery, including forced, bonded, compulsory, illegal prison labour and human trafficking, are strictly prohibited. The Code of Conduct is available in different languages for the convenience of all business partners.
- **Sustainability Commitment** – Suppliers must formally commit to Lindex's human rights, ethical, and sustainability standards as part of all purchasing agreements.

All policies are publicly available on the Lindex website: [Policies](#)

Building awareness and capacity

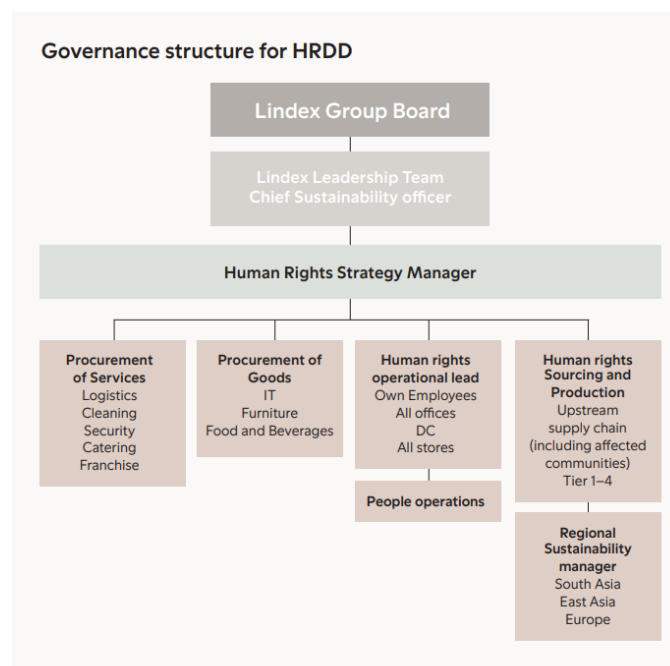
To ensure accessibility and understanding of the company's policies, policies are shared via the website and intranet. New employees are introduced to them during onboarding, and targeted training is provided to relevant staff. Lindex also works actively with suppliers in high-risk regions, including Bangladesh, China, India, and Turkey through workshops, consultations, and peer collaborations to strengthen understanding of human rights expectations.

4. Embedding respect for Human Rights

Due diligence is at the core of Lindex's approach to embedding human rights. The company strives to integrate human rights considerations into strategies, decision-making processes, and reporting wherever possible.

The Lindex Group Board of Directors holds ultimate responsibility for managing human rights policies and is also accountable for addressing related impacts, risks, and opportunities concerning employees, value chain workers, affected communities, consumers, and end users. The Corporate Sustainability team oversees the formulation and review of these policies, while the Lindex Leadership Team, together with relevant business functions, managers, and employees, is responsible for their implementation.

The Chief Sustainability Officer defines Lindex's sustainability direction and strategy and leads the Corporate Sustainability team to meet stakeholder expectations and legal requirements. Supporting this work is the Human Rights Strategy Manager, who sets the company's human rights agenda and ensures alignment with both stakeholder expectations and regulatory obligations. This role also collaborates across functions to establish processes and tools for corporate governance, due diligence, and policy compliance, as well as to integrate sustainability principles into sourcing strategies and company practices.



5. Due diligence process

Lindex is committed to identifying, preventing, mitigating, and remediating human rights impacts that are caused by or contributed to by its business operations. These impacts are systematically addressed in order of severity and likelihood, with a particular focus on vulnerable individuals and groups. Lindex assesses the severity of harm based on scale, scope, and irremediable character,

following the UN Guiding Principles on Business and Human Rights and OECD due diligence guidance. Progress is reported annually in the Human rights report, available on the company's website: [lindex-human-rights-report-2024.pdf](#)

Impact assessment

In 2022, Lindex engaged a third-party consultant to conduct a human rights impact assessment. This assessment mapped Lindex own operations and value chain, considering inherent country and industry risks within Lindex own operations and among its business partners. Conducted in alignment with international standards on business and human rights, including the UNGPs and OECD Guidelines for Multinational Enterprises, the assessment identified risks of adverse human rights impacts and provided the foundation for defining them.

The assessment identified that the risk of forced labour is most prominent risk in the upstream supply chain, particularly in regions with weak regulatory enforcement. The impact assessment also identified risk for forced labour in the logistics supply chain, and Lindex are currently working to expand the scope of its human rights due diligence (HRDD) into other areas of the value chain. The risk of forced labour in Lindex's own operations was assessed as low.

The highest risks in the supply chain are found in agriculture, raw material production, and informal recycling sectors, especially in cotton farming and textile production. Migrant and vulnerable workers are particularly at risk of forced labour, including exploitative practices such as debt bondage and passport retention. Lindex recognises that the root causes of modern slavery in supply chains may include lack of freedom of association, purchasing practices, absence of living wages, and restricted access to collective bargaining.

Supply chain due diligence

Lindex conduct supply chain due diligence as a continuous and ongoing process in each production market. During each assessment cycle, previously identified adverse impacts are reviewed to reflect changes in risks and impacts. Risk monitoring is carried out regularly through a combination of risk assessments, tier 1 audits, and stakeholder and expert consultations. When new risks are identified, they are integrated into strategies and internal processes. Particular attention is given to:

- Significant changes in the risk profile of countries, raw materials, products, or other relevant aspects of operations and supply chain.
- Expansion into new production or operating markets not yet covered by the annual risk assessment.
- Introduction of new materials, product categories, production methods, and new business models.

Lindex engages in stakeholder dialogue through memberships in organisations such as the Ethical Trading Initiative (ETI) and International Accord, through supply chain presence, partnerships, media and NGO discussions, participation in industry surveys and other channels. These interactions help ensure that risks are identified and addressed as they emerge. Feedback from these engagements is integrated into both country level and supply chain-wide risk assessments.

6. Our approach to addressing forced labour in supply chain

Effective supply chain management is fundamental to Lindex's commitment to human rights and ethical business practices. Business success relies on identifying supply chain partners who share Lindex's values and on maintaining both strong relationships and high ethical standards. At a strategic level, Lindex has worked proactively to transform and consolidate its supply chain and has encouraged business partners to become self-reliant. The company aims to work with partners who take responsibility for their own sustainability efforts, as this is considered an important factor in preventing human rights violations.

Lindex has established a strong local presence in high-risk countries through our production offices in Bangladesh, China, Hong Kong, India and Turkey. A dedicated team is responsible for implementing and enforcing policies, working closely with business partners to ensure compliance. This local presence enables close dialogue with suppliers, facilitates visits and audits across the supply chain, and provides access to ongoing insights into market and industry developments that may pose material risks.

Supplier Assessments

Lindex has a zero-tolerance policy for forced labour and child labour, and actively monitors the supply chain for related risks during supplier onboarding and through ongoing assessments. Before a new supplier is onboarded, a pre-assessment is conducted to verify compliance with Zero Tolerance issues and to evaluate performance against the Code of Conduct. This includes an internal Code of Conduct (CoC) audit and/or a third-party audit. These assessments, along with legal documentation, are used to benchmark Zero Tolerance requirements. Any breach results in an immediate halt in the onboarding process.

Regular audits are conducted using the SMETA methodology, and when necessary, corrective action plans are implemented and closely monitored. All newly onboarded suppliers must be registered on SEDEX within six months, before entering the regular monitoring phase. Aggregated result of these audits is published in Lindex's annual Human rights report. Once a supplier relationship is established, Lindex uses a business scorecard to evaluate and recognize high-performing suppliers based on business criteria, as well as social and environmental performance.

Traceability & Transparency

Transparency and supply chain traceability are fundamental to Lindex's sustainability work and are prerequisites for meaningful due diligence. Enhanced visibility throughout the value chain, enables better identification of risks, implementation of risk-based measures, and a more focused approach to preventing or mitigating the most severe and likely adverse impacts on people.

In line with its sustainability promise and commitment to the Transparency Pledge, Lindex publishes its suppliers list, including contact information for factories, processing units, and fabric suppliers on its website and the Open Supply Hub.

The company's cotton strategy is a key element in mitigating the risk of forced labour. By committing to making all cotton traceable through recognised certification schemes by the end of 2026, Lindex aims to create greater transparency and traceability in high-risk cotton sectors. Broader traceability goals include making all products fully traceable by the end of 2027, further reinforcing efforts to prevent forced labour in the supply chain.

Forced labour remediation

In the event of receiving information regarding allegations of forced labour or child labour, Lindex follows a clear, step-by-step action plan. This process includes identifying responsible individuals and implementing appropriate remediation measures as necessary. The action plan is published on the company's website. [Policies](#)

Grievance mechanism:

As part of Lindex's Supplier Code of Conduct, all partner factories are required to have internal grievance mechanisms that workers can easily access. These systems are addressed during audits, including through worker interviews, to ensure they are effective and trusted. Through this process, Lindex has identified challenges linked to workers' trust in suppliers' internal grievance channels. To help strengthen these systems, Lindex continuously work with suppliers to improve their internal processes.

Supply chain workers can also report concerns anonymously through the Speak-Up portal, which is publicly accessible via the Lindex website. In addition, Lindex collaborates with third-party grievance mechanisms through regional and sector initiatives, providing workers with alternative channels for raising concerns.

Action and progress 2024

In 2024, no cases of forced labour were reported within Lindex's supply chain.

Lindex reports annually on its progress in human rights due diligence, with the full Human Rights Report available on the company's website: [lindex-human-rights-report-2024.pdf](#)

Approval and Publication

This statement has been approved by the Lindex Group Board of Directors on 28 April 2025 and will be reviewed annually. It reflects Lindex's ongoing commitment to ethical business practices and its responsibility to eliminate modern slavery in all its forms.