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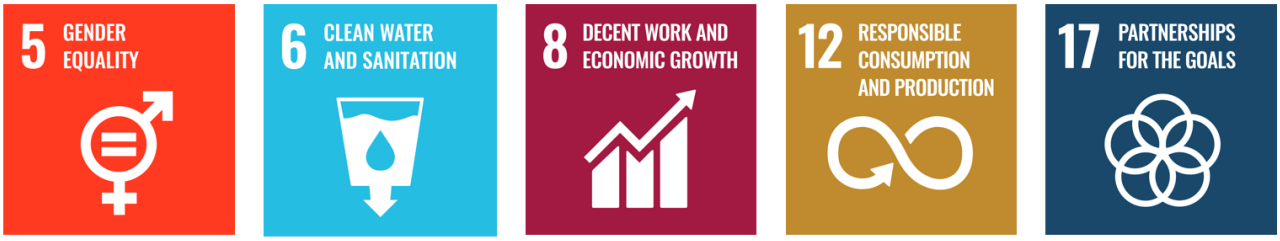
Lindex Group plc's Human Rights Policy

Introduction

Respect for human rights is essential for Lindex Group.

Ensuring the respect and protection of human rights is a key focus area in the sustainability strategies of both divisions of the Lindex Group, Lindex and Stockmann. It is also one of the core aspects of the Lindex division's higher purpose, and part of its sustainability promise. At Lindex Group, in every part of our business, we depend on the decisions, hands, and skills of people; and we are committed to respecting the fundamental human rights of all the people in our value chain.

With this policy and our commitment to respecting human rights we want to contribute to the realisation of the UN Sustainable Development Goals (SDG) and support the ones to which our business can make significant contributions: SDG: 5,6,8,12,17



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Our commitment

Human rights are universal rights inherent to all of us, simply because we exist as human beings and they encompass a wide range of non-negotiable standards for humanity.

Lindex Group is committed to respecting all internationally recognised human rights including those outlined in

- The International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights
- The UN Convention on the Elimination of All forms of Discrimination against Women
- The International Convention on the Elimination of All Forms of Racial Discrimination
- The UN Convention on the Rights of the Child
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- International Labour Organisation (ILO) core conventions

Our Human Rights Policy is aligned with these frameworks, guided by the principles for responsible business conduct outlined in the United Nations Guiding Principles on Business and Human Rights, the UN Global Compact, and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the Women Empowerment Principles and the Children's Rights and Business Principles. At Lindex Group, we ensure that our responsibility to uphold human rights is embedded across all our operations and business strategy as a unified voice.

Therefore, our objectives are clear:

to avoid causing or contributing to human rights violations.

to proactively prevent and mitigate human rights impacts caused by, contributed to, or directly linked to our business operations.

to positively impact society by promoting human rights and sustainability

The Lindex division requires its suppliers and business partners to share the same commitment to respecting these principles, by signing its supplier code of conduct and sustainability commitment. The Stockmann division requires its suppliers to sign the BSCI Code of Conduct or a similar document outlining ethical business conduct.

Scope

This policy reflects our public commitment to respecting and embedding human rights in our own operations and in our value chain, in relation to the following groups of stakeholders:

Our employees and workers in our value chain

We respect the rights of the people whose hands, skills, and dedication make Lindex Group possible; we acknowledge that each person has rights, and must be treated with dignity and respect.

Our commitment to safeguarding workers' rights and advocating for decent working conditions extends beyond our employees; it

encompasses the entire workforce within our value chain.

Our commitment to respecting human rights guides us in our work to create a healthy and safe working environment free from discrimination where all individuals are treated fairly, with respect and have equal access to opportunities and resources.

Suppliers and other business partners

We consider human rights in the relationships with all our suppliers and business partners. We strive to find partners who have an aspiration to move beyond compliance and share our commitments to human rights. We are committed to responsible and ethical sourcing, which means acquiring products and services from suppliers while considering their potential impact on human rights and the planet.

The Lindex division has developed a Responsible Sourcing Policy which represents our approach to responsible sourcing and purchasing practices. It describes our commitment to ensuring that our sourcing and purchasing decisions, and other supporting processes, are in line with our commitment to respect human rights.

Consumers and end-users

We are dedicated to ensuring that the human rights of our consumers and end-users are respected in every country in which we operate with a specific focus on: the right to health and safety, the right to privacy, the right to be free from discriminatory practices, and the right to information disclosure.

Our Consumer and End-user Policy was developed to address the needs and concerns of this group of stakeholders and describes our commitment to respecting the human rights of customers and end-users.

Affected communities

We recognise our impact on the communities in which we operate. As a global organisation, our values and way of working affect many people living near to our value chain activities. We commit to respecting the rights of these people to have access to clean water and sanitation and adequate housing and we minimise our impact on land. Our Environmental Policy has been developed to outline this commitment.

Governance

The Board of Directors is responsible for the management of actual and potential human rights risks, impacts and opportunities. Lindex Group's Board of Directors approves the Human Rights Policy. When necessary, the CEO or CEO's delegate may make technical amendments to the policy approved by the Board of Directors.

The Corporate Sustainability team at Lindex Group are responsible for formulating and periodically reviewing this policy. The Group Management Team and the respective business functions covering all departments, managers, and employees are responsible for the implementation of the policy.

Stakeholder dialogue

We recognise the important role of stakeholder dialogue in the development of this policy and in the implementation of the human rights due diligence process. We strive to engage in dialogue with affected stakeholders or their credible proxies. When developing this policy we consulted with representatives from different stakeholder groups.

We are committed to actively engaging in dialogue with stakeholders in our value chain through local representation in our major sourcing countries and to membership in industry initiatives, partnerships and dialogue with NGOs, worker representatives and other channels.

It is of high importance for us to ensure an open dialogue with our employees and to actively engage with them. We do that by holding regular meetings with employee representatives and learning from our employee surveys and our grievance channels.

Our relationship with our suppliers is built on partnership and takes place through our production offices in our main sourcing markets. We have an open and ongoing dialogue with our suppliers and we visit them on a regular basis and work on capacity building projects within Human rights. We ask our suppliers and business partners to engage with their workers and worker representatives through suitable means, such as social dialogue with worker representatives and grievance channels.

We actively communicate with our customers through open customer service channels and social media. In addition, we conduct frequent customer surveys that give our customers the opportunity to provide effective feedback on our products and communication.

Implementation

Human rights due diligence

To integrate Lindex' Group’s Human Rights Policy into our business management, we conduct an ongoing and dynamic human rights due diligence (HRDD) process in the Lindex division’s own operations and value chain. We are committed to developing a HRDD process in the Stockmann division as well. To support the implementation we commit to conducting ongoing training and tailoring the content to different roles and functions both within our own operations and with our suppliers and business partners.

We are committed to identifying, preventing, mitigating, and remediating human rights impacts caused by or contributed to by our business operations, systematically addressing them in order of severity and likelihood. We are committed to paying particular attention to individuals or groups who may be at great risk of negative human rights impacts due to their vulnerability e.g. minorities, migrant workers, women, children and people with disabilites.

Based on our business relationships, leverage, and operational context, we employ tools such as the Lindex division’s Supplier Code of Conduct, sustainability commitment and business score card as well as capacity building programmes, and we engage in dialogue with relevant stakeholders to detect potential human rights impacts within our value chain. When human rights violations are caused by third parties, we strive to use our leverage to ensure remediation and implement preventative measures.

We are committed to reviewing and adapting company policies and practices on a regular basis to ensure that they are in line with our Human Rights Policy. We are also committed to revising our priorities, strategies and roadmaps based on the results of the impact assessment process.

Metrics and targets

To measure our progress on human rights in our own operations and in the value chain we developed specific, measurable goals and we commit to reviewing them on a regular basis.

We are also committed to regularly reporting on progress against these goals both internally to the management team and Board of Directors and to external stakeholders.

Disclosures and communication

Transparent reporting is of high importance for us. Apart from reporting in line with legal obligations, such as EU Corporate Sustainability Reporting Directive and Norwegian Transparency Act, we also strive to actively share our progress and best practices with industry peers and our stakeholders.

Collaboration and advocacy

The transformational changes needed cannot be achieved by Lindex Group alone, so collaboration, advocacy and engaging with our stakeholders are all part of our commitment. Together we can increase leverage, share what we have learnt, and pave the way for harmonisation among industry players.

In line with UN Sustainable Development Goal 17, we are part of multiple commitments where we join forces with others and gather around common goals and ambitions.

The complex global and intertwined nature of the fashion industry means that we must collaborate with suppliers, industry partners, NGOs, and research institutions to advance understanding and solutions.

We welcome the development of the legislative landscape to level the playing field and drive systemic change. To further support this development, we engage in policy dialogue across all sustainability topics and the entire value chain.

Grievance mechanism

We are committed to providing a safe, accessible, and effective grievance mechanism for all stakeholders affected by Lindex Group's operations, including employees, suppliers, business partners, workers in the value chain, customers, and community members affected by our operations. Our Speak-Up Policy describes our commitment to creating a culture of transparency, accountability, and ethical behaviour. To ensure access to remedy, Lindex Group provides a third-party complaint mechanism for anonymous reporting within the designated speak-up portal WhistleB. The channel is available for all stakeholders to anonymously report any suspected or detected violations of the Human Rights Policy.

Our focus

Considering our divisions' purposes, values and the salient issues identifed through our due diligence process, we prioritise the following specific human rights concerns within our value chain.

Labour rights

We are committed to following international and national labour regulations to ensure that our employees enjoy the standards established by the ILO Core Conventions. We pay close attention to fostering a healthy and safe work environment at Lindex Group, which is free from discrimination and harassment, respects working hours, provides fair wages, encourages social dialogue, promotes work-life balance, and upholds workers' freedom of association and collective bargaining rights.

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Women empowerment

In line with the Lindex division's higher purpose we are dedicated to promoting gender equality in all aspects of our operations and across our value chain through programmes, and partnerships.

By driving capacity building and local partnership programmes the Lindex division commits to investing and using its business leverage to improve women's health and well-being in the markets and communities where we operate. We also aim to take the lead in strengthening women's positions and equal rights across our entire value chain, closing gender pay gaps and making sure women have the same opportunities as men in career progression leadership.

Childrens rights and prohibition of child labour

We are committed to respecting children's fundamental rights and accounting for the best interests of the child with respect to all our business activities.

We strictly condemn and prohibit the employment of children in any work related to our business that deprives them of their childhood in accordance with the ILO's Conventions on Child Labour and Minimum Age. If we identify child labour, we have a specific action plan to immediately cease the violations and initiate corrective measures to address them.

We strive to provide decent working conditions that support employees, both women and men, in their roles as parents or caregivers.

We commit to ensuring that products and services are safe and seek to support children's rights through them. We also commit to using marketing and advertising that respects and supports children's rights.

Freedom of association and collective bargaining

We value the voice of our employees and are committed to an open and constructive dialogue with all our employees and their representatives. We respect the right of all employees and workers in the value chain to form and join, or to not join, trade unions or similar organisations where they can voice their concerns and be represented without fear of intimidation, discrimination, or reprisal. Following the right to freedom of association, we also respect the practice of collective bargaining as a constructive means of dialogue between workers, unions, and employers, all working together to enhance working conditions.

Adequate wages

We commit to providing our employees with an adequate wage that ensures a decent living standard. Wages and benefits paid for a standard working week must, at a minimum, meet national legal standards, the local industry standards, or collective bargaining agreements, whichever is higher. In any event, wages for a standard working week should always be enough to meet basic needs and provide some discretionary income.

We respect all applicable laws and agreements on working time, paid leave, sick leave and parental leave. We also respect the right to rest and leisure, including vacation with pay and the right to family life.

We are committed to equal pay for work of equal value and to ensure that women have equal opportunities for employment, promotion, and professional development. We

also commit to evaluating and assessing the gender pay gap and working to close the gap.

As a buyer we use our leverge to influence wage progression towards an adequate living wage in our value chain and an adequate living income for self-employed workers and smallholders. We are committed to adopting purchasing practices that contribute to living wages in our value chain.

Prohibition of discrimination

We firmly reject any form of direct or indirect discrimination based on gender identity, sexual orientation, race, nationality, ethnic or social origin, disability, language, opinion, religion, or age, to nullify, exclude, or disfavour a person or a group of people.

We maintain a zero-tolerance policy for discriminatory behaviour and are committed to thoroughly investigating and addressing any complaints received by our managers or through our grievance mechanism.

Diversity, equity, and inclusion

We value diversity, inclusion, and equal treatment in our business. We want to be a workplace where everyone feels welcome to show up just as they are, and we want to have a diverse workforce where new ideas and perspectives come together.

We strive to ensure that our value chain is free from discrimination and has an inclusive environment where all individuals are treated fairly, with respect and have equal access to opportunities and resources.

We strive to ensure that differences are represented throughout the organisation, both internally and externally, by embracing different perspectives, backgrounds, and experiences.

Prohibition of offence and harassment at the workplace

We do not tolerate offences, harassment, sexual harassment or any behaviour that makes an employee feel offended, threatened, intimidated, or ill-treated. We are committed to providing a safe, pleasant, and fair work environment where all individuals are treated with dignity. To foster this space, all employees, managers, and directors share a collective responsibility to treat each other with mutual respect and care.

We encourage workers to report suspected violations to a team leader or a manager or a colleague from HR, Security or Sustainability, or through our grievance mechanism and we are committed to treating reported incidents seriously and to promptly investigate all allegations thereof. Acknowledging that violence and harassment often occurs in situations of unequal power relationships, we commit to taking adequate steps to ensure protection from retaliation during and after the investigation.

Occupational health and safety

We respect the right of our employees to enjoy favourable working conditions, encompassing the assurance of a safe and healthy workplace, the enhancement of environmental and industrial hygiene, and the prevention and treatment of occupational diseases or other job-related injuries.

We are committed to continuously improving health and safety performance, complying with all relevant laws and regulations, and preventing workplace injuries and health issues.

We provide special consideration to safeguarding the health and well-being of female workers in our supply chain by

promoting awareness and implementing projects tailored to their needs.

Prohibition of forced labour and human trafficking

We do not accept forced labour in our own operations or in our value chain, which include activities conducted by our suppliers and other business partners. Forced labour violates individuals' fundamental rights to dignity and equitable employment, as articulated in the ILO's Forced Labor Conventions.

We condemn all forms of modern slavery, especially those linked to our industry which includes forced labour, debt-bonded labour, compulsory labour, penalty labour, prisoner labour, and human trafficking. If any of these violations are identified, we have a comprehensive action plan in place to immediately cease the violations and initiate corrective measures to address any resulting harm.

Access to clean water and sanitation

We aim to minimise our impact on water and secure access to clean water and sanitation in our own operations and across the supply chain. Our environmental policy is developed to outline this commitment. To address the impact that our operations have on water, we strive to promote water efficiency, reducing the risk of water scarcity and pollution in regions associated with our operations, and collaborating with our partners to protect the environment and the health of both factory workers and nearby communities. We also work to improve access to clean water, sanitation and hygiene in the most vulnerable communties with a special focus on women and their specifc needs.

Speak up

Lindex Group encourages all of its employees, suppliers, partners, public authorities, customers, and other stakeholders to report any misconduct or raise concerns relate to this policy through the whistleblowing channel:

https://report.whistleb.com/en/lindexgroup

All reports will be thoroughly investigated and addressed by the company. **For questions concerning this policy or its contents, please contact your team leader or the person responsible for this policy:**

Anna-Karin Dahlberg, Chief Sourcing & Sustainability Officer

This policy is approved by the Lindex Group plc’s Board of Directors on 22 August 2024.