LINDEXGROUP

Lindex Group plc’s Speak-Up Policy

Purpose

Lindex Group is committed to creating a workplace environment where ethical conduct, integrity, and compliance with laws and regulations are upheld. This Speak-Up Policy is designed to encourage everyone working at or with Lindex Group to report concerns regarding potential violations of law, regulations, organisational policies, or ethical standards without fear of retaliation. Anyone who experiences or observes misconduct involving Lindex Group or its value chain is encouraged to raise their concern under this policy. Such concerns are handled in line with internationally recognized human rights standards on effective grievance mechanisms and access to remedy.

Scope

This policy applies to everyone associated with Lindex Group, including but not limited to, all employees, interns, contractors, vendors, stakeholders, customers and workers within Lindex Group’s value chain, and anyone who experiences or observes misconduct involving Lindex Group or its value chain.

Principles

Confidentiality: Lindex Group recognizes the importance of confidentiality in protecting individuals who report concerns and all reported concerns will be handled confidentially. Access to the reports and information relating to an investigation is restricted to the individuals carrying out the investigation and information may be communicated further only on a strict need-to-know basis and only for the purpose of carrying out the investigation and enforcement purposes. While every effort will be made to maintain confidentiality, it is understood that in certain circumstances, it may be necessary to breach confidentiality to conduct a thorough investigation or comply with legal requirements.

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Non-retaliation: Lindex Group strictly prohibits retaliation against any individual who makes a good-faith report of suspected misconduct or participates in an investigation. Retaliation against individuals raising concerns under this policy will not be tolerated and may result in disciplinary action, up to and including termination of employment or contractual relationship.

Fair treatment: Individuals who report concerns will be treated fairly and with respect throughout the process. Investigations will be conducted promptly, objectively, and with respect for the rights of all parties involved.

No malicious or false reports: Reports made under this policy must be made in good faith and based on reasonable belief. Malicious or knowingly false reports may result in disciplinary action.

What concerns can be reported?

You can report breaches of our Code of Conduct or violations of the law which includes, but is not limited to, bribery and corruption, embezzlement, extortion, theft, fraud, money laundering, financial and tax crimes, international trade controls, falsification or destruction of information, retaliation and punitive measures, rights and protection of persons, conflicts of interest, misuse of confidential information, bullying, exercise of threats or physical violence, (sexual) harassment or discrimination, child labour, forced labour, precarious employment practices, illegal subcontracting and environmental damage caused by operations. You can also report violations related to competition law, product safety and quality, protection of personal data, occupational safety, statutory wages and severance payments, freedom of association and applicable working time guidelines.

How to report a concern

Internal reporting: You are encouraged to report concerns internally, to a team leader or manager, or a colleague from HR, Security, Sustainability, Legal or Internal Audit. If you feel uncomfortable reporting to any of these, you can report concerns to our designated speak-up portal.

External reporting: If you believe your concern has not been adequately addressed, you can report directly to external regulatory authorities or appropriate government agencies. In the EU, each member state has designated competent national authorities responsible for providing external reporting channels for whistleblowing.

Anonymous reporting

Lindex Group provides mechanisms for anonymous reporting within the designated speak-up portal, to facilitate reporting for those who prefer to remain anonymous. When submitting a message to the designated speak-up portal you will receive instructions on how to enable secure two-way communication. We may ask you for further information in order to proceed with an investigation. You will remain anonymous throughout this dialogue. If we receive no reply from you,

this may affect our ability to handle your concern appropriately.

Investigation and follow-up

Upon receipt of a reported concern, Lindex Group or its local divisions will promptly investigate the concerns raised in a fair and impartial manner.

When reporting a concern, you will receive confirmation within seven calendar days after receipt of your concern. You will be further informed about the process and handling of the report, and on the closure of the case. You will receive feedback on the outcome and/or status of the case within three months after the receipt of your concern, but we often communicate with you throughout the process for information and updating purposes.

Reported concerns to Lindex Group and Stockmann division are handled by the Group Chief Legal Officer, and reported concerns to Lindex division are handled by designated case handlers from relevant functions, such as Security, HR or Sustainability, depending on the nature of the concern. Any function directly connected to the concern will be excluded from handling or investigating the matter. The case handlers ~~also~~ have the mandate to initiate investigations independently, without the involvement of management, and formulate conclusions from the investigation. If the reported concern means that a report to law enforcement agency should be made, the case handlers have the mandate to make such report during the investigation.

Reports made centrally to Lindex Group are handled at Group level and concerns reported locally, to Lindex Group subsidiaries, are handled at local level.

Concerns reported at local level may reveal a structural problem or a problem that affects two or more entities of the Group. To effectively address such concerns, involvement at Group level may be required and we may need to send your report to Group level for further handling. Should this be the case, we will inform you in advance and give you the opportunity to object. If you object, we will not send your report to Group level. This may affect our ability to handle your concern appropriately.

Depending on the topic and location of the concern, or if requested by you, relevant employee or worker representatives and/or NGOs may be engaged to support the rights of all parties involved.

If necessary and in strict confidence, other people whose expertise and information are considered necessary for the proper investigation of the matter may be engaged to assist an investigation, such as internal or external lawyers, forensic experts, or auditors. Access to reports and information relating to an investigation is restricted to the individuals carrying out the investigation and information may be communicated further only on a strict need-to-know basis and only for the purpose of carrying out the investigation and enforcement purposes. If any of the individuals handling the investigation or enforcement is the subject of the concern, the individual is excluded from the investigation and enforcement.

Following the investigation, findings and conclusions from the investigation will be reported to the relevant Lindex Group and divisions' management for a decision on a remediation plan~~.~~

If the concern relates to a member of a subsidiary leadership team, the findings and conclusions from the investigation will be reported to the leadership team of the parent organisation. If the division's leadership team is subject to the concern, the findings and conclusions from the investigation will be reported to Lindex Group Board of Directors.
Appropriate corrective action will be taken if misconduct is substantiated. This may include disciplinary action, remedial measures, policy or routine changes, or other actions considered necessary. Information from grievances and investigations is also analysed to identify root causes, prevent recurrence, and improve policies and practices.

Data protection and GDPR

All reported concerns are deleted when no longer needed for investigation, remediation and enforcement purposes, and usually within two months (60 days) of completion of the investigation. Documentation from investigations will be anonymized: names and addresses will be removed together with any other information which could directly or, together with other data, indirectly identify either the person who reported the concern or the person that is the subject of a concern.

Conclusion

Lindex Group is committed to creating a culture of transparency, accountability, and ethical behavior. This Speak-Up Policy is intended to provide everyone working at or with Lindex Group with confidence and assurance that their concerns will be taken seriously and addressed appropriately.

Contact Information

For inquiries regarding this policy or its content, please contact the person responsible for this policy: Group Chief Legal Officer or Lindex division's Head of Security and Legal.

Review and Updates

This policy will be periodically reviewed and updated as necessary to ensure its effectiveness and alignment with best practices and legal requirements. Employee feedback on speak-up confidence and trust in concern handling will be considered as part of the review process.

Approval

This Speak-Up Policy is approved by Lindex Group plc's Board of Directors on October 2026.