

# Group Policy on Competition Law Compliance

## 1. Scope

This Group Policy on Competition Law Compliance ("**Policy**") applies to all employees and Board Members within the Lantmännen Group. The Policy covers all companies that are more than 50% owned by the Lantmännen Group (in this Policy referred to as "**Lantmännen**" or "**Group**"). It also applies as guiding principles for Board Members representing Lantmännen or persons hired by subsidiaries in which Lantmännen is a minority owner.

## 2. Summary

Lantmännen has a diversified business where strict compliance with all legal and regulatory requirements is an integral part of the corporate culture. This applies in all jurisdictions where the Group conducts its business and must be kept in mind constantly on all levels of the Group's organization.

It is Lantmännen's policy to promote free and fair competition, which is the foundation for any progressive and innovative business. Lantmännen's strength lies in its own competence and Lantmännen shall therefore compete as strongly and constructively as possible, while at all times complying with applicable competition rules. Violations of competition legislation may have a detrimental effect on Lantmännen's good reputation and brand and may lead to severe consequences for the individuals involved. The competition authorities and/or the relevant courts have competence to impose a number of sanctions such as fines of up to 10% of the Lantmännen's annual turnover, damages (in relation to customers, competitors etc. affected by the actions undertaken) and prohibited clauses in an agreement may be declared null and void. In some countries (for example in the UK and in the Netherlands), individuals may face criminal sanctions.

The purpose of this Policy is to provide support and guidance to all employees as competition rules provide an important framework within which Lantmännen must operate.

### 2.1. Laws and Ethical Guidelines

Lantmännen complies at all times with all relevant laws and rules in the markets in which the Group conducts business, including, but not limited to, competition (antitrust) rules. Competition law exists both on European Union level – enforced by the European Commission in Brussels – and on national level in all European countries, enforced by national competition authorities and courts. These rules prohibit anti-competitive agreements between companies such as price-fixing and market-sharing cartels between competitors, as well as abuse of market power held by companies with a dominant market position. It is Lantmännen's policy to fully

respect the competition rules and the ideas about free and fair competition, which are behind these rules.

### **3. The Policy**

#### **3.1. Complementary Documentation**

This Policy is complemented by the Lantmännen Competition Law Compliance Manual, specific annexes for each of Lantmännen's four main Sectors as well as the Competition Law Compliance Guidelines for Trading Activities which should all be deemed as an integral part of this Policy and can be found on [Inside](#).

#### **3.2. Training**

Lantmännen employees are regularly trained on topics related to fair competition. The training is adapted in accordance with the assessed level of risk exposure for each employee in his/her day-to-day work. Managers at all levels shall ensure that employees receive information and training concerning this Policy in accordance with the assessed risk exposure.

#### **3.3. Protection Against Harassment**

Lantmännen protects employees who refuse to accept behavior, irrespective of manifested through actions or agreements, which they deem may be violating competition law. Any person who refuses to participate in such behavior or who notifies impropriety will never run the risk of dismissal, disciplinary action or other unfair treatment as a result of such refusal or notification.

Any person who feels that they have been unfairly treated is urged to contact group function Human Resources or the whistle-blower function available on Inside at [Whistleblowing](#).

#### **3.4. Agents, Distributors, Suppliers and other Business Partners**

Lantmännen provides information concerning its zero tolerance of violations of applicable law, including competition law, to all agents, distributors, suppliers and other business partners (jointly "**Business Partners**"). Lantmännen expects that their Business Partners do not engage in any actions or enter into any agreements, which may violate competition law when representing or otherwise working for Lantmännen.

When required, Lantmännen examines the integrity of its Business Partners. Lantmännen will only enter into agreements on terms and conditions, which provide that its Business Partners shall not violate any applicable legislation, including competition legislation, and shall be entitled to terminate agreements in the event of breach of such provisions by its counterparty.

#### **3.5. Business Responsibility**

The Lantmännen Board of Directors has the overall responsibility for the implementation, compliance with and review of this Policy. Managers at all levels

are responsible for ensuring compliance with this Policy in the day-to-day operations. Managers are also responsible for ensuring that employees who are active within sales, involved in extensive contacts with external parties or handling tasks, which are sensitive from a credibility or competition perspective, are informed of the Policy and sign a declaration confirming their understanding of this Policy.

Lantmännen employees are at all times entitled to approach their direct manager or Group Legal Affairs & Compliance for advice in respect of this Policy.

#### **4. Responsible Owner of this Group Policy**

The Head of Group Legal Affairs & Compliance is the owner of this Policy and has the overall responsibility for its implementation and regular updates.

#### **5. Date of Approval**

Group Policy approved by the **Lantmännen Board of Directors 2022-05-05**.

Supervised by:

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*Magnus Kagevik*  
Group President & CEO

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*Tove Cederborg*  
General Counsel