

*It was resolved by the Board of Directors of Lifco AB (publ) (Reg. No. 556465-3185) (the "Company") at a meeting held on 1 February 2024 to adopt this*

## HR Policy

### Introduction and Purpose

Lifco's business concept is to acquire and develop market-leading niche businesses that conduct sustainable operations and have the potential to deliver sustainable earnings growth and robust cash flows. The Group pursues a distinct business strategy focusing on results, simplicity and decentralization with the overall aim to increase earnings every year. Positive effects of delivering strong results are satisfied customers, employees and a basis for continuous investment. Furthermore, Lifco has a highly decentralized structure and believes in freedom under responsibility with high ethical standards.

Our position as a leading player and our future aspirations means responsibilities and commitments, and the right actions and behaviors from every employee are crucial components to achieve our goals. The purpose of this Policy is to clarify expectations and responsibilities in key areas for employees of the Company.

When using "Lifco" in this Policy, this should be read as any company in the group or the group as a whole.

This Policy applies to all companies within Lifco including all its employees as well as temporary employees.

### Expectation of Lifco's Employees

Lifco sets requirements and expectations on its employees to ensure that business objectives are met, and that laws and collective agreements are respected. The requirements and expectations are supported by the code of conduct and Lifco's values.

Lifco's employees are expected to take personal responsibility for:

- contributing to the achievement of business objectives;
- knowing and complying with the rules governing the business;
- performing their duties to the best of their ability and take the initiative to make improvements;
- cooperating and exchanging information within and outside their own group;
- contributing to a good working environment and health, both physical and psychosocial;
- paying attention to and respecting other employees;
- developing oneself, one's own skills, and to be curious about how others solve challenges;
- being open and adaptable;
- welcoming employees and giving feedback;
- representing the company in a professional manner and not act or speak with the intention of damaging Lifco's business and brand.

In addition to the role of employee, a manager of the Company, is expected to take personal responsibility for:

- achieving the business objectives of the unit;
- clarifying expectations of employees;
- ensuring that employees have the right skills for their positions;
- clarifying responsibilities and authorities;
- assessing employers' performance and providing feedback;
- communicating easily and make oneself clear with staff and management;
- developing behaviors in line with Lifco's values;
- ensuring that conditions for a good working environment and health, both physical and psychosocial, do exist;
- preventing discrimination, harassment and bullying, and promoting equality and diversity.

## **Common Values**

In order to meet the targets set by the Company itself, Lifco has declared the following three common values that will characterize the decision-making processes and behaviors of employees.

### ***Respect for Others***

In all our dealings with customers, employees and other stakeholders we must respect them as human beings of equal value regardless of gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, age, nationality, political opinion, labour union membership, status, social background, language, health status or family matter. Thus, we have to make our best efforts to listen to and respect each individual's opinions even if we ourselves are of a different opinion.

### ***Openness***

It is of utmost importance that we create an atmosphere where people dare to be open. In achieving this we openly have to concede our mistakes. It is natural that every human being makes mistakes.

### ***Pragmatism***

We should aim to make the best possible decision in every single case. The decisions should purely be based on facts and without prejudice. Further, preconceived opinions or pride should not influence decisions.

## **Competence Provision**

All new recruitments must be pre-approved by the Managing Director of the company concerned. All recruitment shall be based on competence and personal suitability. No applicant shall be discriminated. If a vacant post is placed in a country where a subsidiary has not previously operated, Lifco's Group CEO shall always pre-approve the recruitment. Each company in the group shall have a process regarding introduction of managers and employees.

Lifco encourages a culture of clear and immediate feedback on performance. The Managing Directors of the subsidiaries decide how they want to design routines to discuss objectives, performance, behaviors and development plans.

Lifco has a particular focus on harnessing the competence and commitment of those employees who are performing exceptionally well.

If an employee gives its notice of dismissal, the reasons for the decision should be followed up by the Managing Director of the company concerned.

## **Freedom of Association, Trade Union Agreements and Cooperation**

Lifco shall respect the right of every employee to join or refrain from joining labor unions or other organisations. Lifco shall work to ensure good cooperation with the labor unions representing its employees.

## **Equality, Diversity and Equal Treatment**

Lifco shall promote a working environment and a corporate culture based on the value of equal worth for all. All employees within Lifco shall have equal rights, obligations and opportunities regardless of gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, age, nationality, political opinion, labour union membership, status, social background, language, health status or family matter. Discrimination, harassment, abuse or threats in the workplace must not occur.

## **Whistleblowing Process**

Lifco nourishes an open and honest culture where all employees are encouraged to speak their mind. In addition, employees should raise concern about behaviors with their immediate manager if such behavior could be a potential risk to themselves, their colleagues, Lifco's business or reputation, or to any other stakeholder. In the event the employee feels that the issue raised does not get an appropriate or adequate response, the concern should be elevated to the Managing Director of the company concerned.

For serious improprieties concerning for example accounting or environmental crimes Lifco has a whistleblower service where reports can be filed anonymously. The whistleblower service is available on <https://report.whistleb.com/en/lifco>.

## **Wages, Working Hours and Other Working Conditions**

Lifco shall pay market wages and apply differentiated and individual compensation based on the degree of difficulty of the position, responsibility and performance of the individual and in accordance with local laws, regulations and generally accepted local industry standards and/or according to local unions collective agreement. Minimum wage requirements by law or contract must be complied with. Lifco pays wages regularly, in full and on time, and does not demand that the employees pay work-related fees or costs. Employees receive payslips digitally or in paper format there their salary is shown and any eligible deductions are shown. Lifco does not retain employees' personal documents. Lifco's policy regarding employment wage conditions also covers employees who are employed via third party. Employees including temporary employees of Lifco must have a written employment contract. The document must be confirmed by both the employer and the employee through signatures. Lifco shall respect the privacy of its employees and treat personal data confidentially and in accordance with the General Data Protection Regulation ("GDPR").

To protect the health and safety of employees, employees' working hours are regulated in the terms of employment. Working hours must be regulated in accordance with local laws, regulations and guidelines and according to local unions collective agreement where applicable.

Lifco pays pensions in accordance with local laws, regulations and generally accepted local industry standards and/or according to local unions collective agreement. Generally, occupational pension shall not be granted, and exceptions require resolution by Lifco's Group CEO.

Fringe benefits shall be appropriate and in line with market conditions. Fringe benefits shall as a rule be general and directed to all or certain groups of employees. Individual benefits may only be approved in exceptional cases. Fringe benefits shall be approved by the respective Managing Director of the subsidiaries.

If an initiative is taken to terminate an employment, a negotiating mandate must be obtained from the Managing Director of the company concerned before a process is initiated.

## **Travels**

Business travel should be appropriate and cost-effective and should be done in a way that provides a safe and secure working environment, including when travelling.

## **Gifts to Employees and Internal Representation**

Gifts to employees, such as Christmas gifts, keepsake and anniversary gifts or similar, should be reasonable. Internal representation should have a clear purpose and be restrained in frequency and value. Gifts, as well as internal representation must comply with the criteria set out by each local tax authority in the subsidiaries, in order not to give rise to taxation of benefits.

## **Working Environment**

Lifco shall promote health and prevent harm. This means that Lifco shall provide a good working environment that from a physical, health and psychosocial point of view is safe. Lifco is working actively to minimizing risks of injuries, accidents and other incidents. Health and safety issues should be treated with openness and care. Risks must be identified and analyzed, and when necessary, measures shall be taken. Managers are required to report information about risks of workplace accidents or injuries to local work environment manager or the Managing Director of the company concerned. More serious incidents and accidents must be reported to Lifco's Group CEO by the Managing Director of the company concerned. No employee of Lifco, permanently or temporarily employed, or with its suppliers should suffer retaliation or discrimination because they reported risks of injury or ill health to employees at the workplace.

All employees including temporary employees and consultants performing tasks on behalf of Lifco must receive relevant instructions and training to perform the tasks. Training required to perform the tasks must be carried out during paid working hours. Lifco must always follow safety regulations as stated in laws, guidelines and instructions from example equipment suppliers. Employees also have responsibilities to keep up-to-date on current procedures and processes for handling, for example, machines and hazardous substances.

Lifco's employees shall not be under the influence of alcohol or drugs in the workplace. At work-related events such as team building activities and internal or external representation, the use of alcohol may be permitted, under the conditions that non-alcoholic alternatives are available and that alcohol is handled with discretion and moderation.

## **Organizational Changes**

If major organizational changes take place in a subsidiary, the respective company shall consult in advance with the relevant trade union or trade unions. In the event of any downsizing, the employees must be given information in advance at least in accordance with the time as local practice or local regulations specify or the time specified in the collective agreement.

## **Parental Leave**

Lifco takes a positive view of parental leave and encourages both fathers and mothers to take advantage of their statutory parental leave where such exists. Lifco does not allow discrimination against parental leave and parental leave must be offered the opportunity to return to equivalent duties after taking parental leave.

## **Community Engagement and Secondary Occupation**

Lifco's employees are free to participate in voluntary work, including political activities. However, Lifco does not allow party-political activities in the workplace. Personal political involvement must not be perceived to be supported by the Company.

Employees may not engage in activities or perform work (secondary occupation) that competes with Lifco's business or that may adversely affect the employee's ability to perform his or her duties at Lifco. Any secondary occupation must be agreed with the immediate manager.

## **Equipment, Tools and Other Property of Lifco**

The allocation of equipment and tools shall be based on need. Equipment and working tools which Lifco provides to employees is the property of the Company and shall be handled with care. Property of Lifco must not be used for competitive purposes or in any other improper manner that may be detrimental to the Company or to the employee's own, family's or friends' gain.

Private use of Lifco's facilities and equipment is not permitted. Exceptions may be made at the discretion of the immediate manager, provided that the use does not involve a cost to the Company or result in taxation of benefit.

## **Exceptions**

Any need for exceptions to this policy must be clearly defined and documented. All exceptions shall be approved by Lifco's Group CEO.

## **Implementation and Communication**

This Policy has been adopted by the Board of Directors and the ultimately responsible for the implementation and follow up is Lifco's Group CEO. The Managing Directors of the subsidiaries are responsible for implementing and communicating this policy to their organisations.