

# Code of Conduct



# Welcome to the LINAK® Code of Conduct

Our LINAK reputation as a market leader in innovative actuator solutions is built on quality, innovation and responsibility. The LINAK Code of Conduct helps everyone in our organisation to implement these commitments, understand their responsibilities, aligning their actions and decisions to uphold the highest standards of ethical behaviour in all our business practices. It is not just a set of rules, but a reflection of our commitment to ethical principles that drive our success and underpin relationships with customers, partners, and communities.

The principles outlined in the LINAK Code of Conduct apply to all LINAK entities and where relevant, to all LINAK business partners. Requirements directed at LINAK suppliers must also be complied with by their respective sub-suppliers.

The LINAK Code of Conduct incorporates the Ten Principles of the UN Global Compact. LINAK expects everyone to adhere to these principles and act in a manner that reflects dedication to ethical conduct.

## **Uphold our values**

The LINAK Code of Conduct reflects the fundamental core values of our organisation. However, to ensure that these values are upheld in daily operations, it is essential to provide continuous reinforcement and training for all employees, including management. We expect our business partners to adopt similar practices.

## **LINAK Whistleblower**

LINAK strongly encourages its employees and business partners to report any suspicious misconduct or non-compliance with the LINAK Code of Conduct via the LINAK Whistleblower.

- The LINAK Whistleblower can be accessed at [www.linak.com](http://www.linak.com).
- All reports are investigated in a fair manner and within reasonable time.
- Reports can be made anonymously and will be handled confidentially and professionally.
- LINAK does not tolerate retaliation and expects that none of its business partners will retaliate against anyone who reports suspected or known cases of misconduct in good faith.

LINAK expects its business partners to have a reporting system in place to allow employees to voice concerns anonymously and without fear of retaliation, with the same safeguards LINAK provide in its Whistleblower function.

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WE IMPROVE YOUR LIFE

LOYALTY, OPENNESS  
AND HONESTY

# 1. Human rights

## Labour rights

### Health and safety

LINAK requires its employees and suppliers to create safe and healthy workspaces.

To establish a safe and healthy workspace for its employees, LINAK:

- Ensures, that all necessary personal protective equipment is available and used by all affected employees at no cost to them.
- Ensures that hazardous materials are handled and stored safely at all times in accordance with our safety procedures.
- Ensures that emergency response measures tailored to specific work activities and locations are provided.
- Ensures that appropriate first aid arrangements are readily available.
- Maintains a robust safety management system.
- Provides adequate health and safety training programmes.
- Requires compliance with all relevant health and safety regulations under applicable law.

LINAK requires its suppliers to apply similar measures.

### Modern slavery

LINAK requires its employees and business partners to combat modern slavery.

LINAK does not permit or tolerate forced or involuntary labour, also known as 'modern slavery', not internally, nor throughout its global supply chain.

Modern slavery includes forced labour, debt bondage, human trafficking, child labour, and other rights abuses that deprive individuals of their freedom and rightful working conditions.

To combat modern slavery in its global supply chain, LINAK:

- Maintains a zero-tolerance policy towards modern slavery.
- Requires compliance with applicable labour laws and ethical business practices.
- Requires that any employment of workers is made on a voluntary basis, allowing employees the right to terminate their contract at any time with reasonable notice.
- Prohibits the withholding of wages, identity cards, travel documents, or other legal documents that could prevent an employee from ending their employment or moving freely.
- Ensures mechanisms for employees to report grievances and suspected violations of the Code of Conduct without fear of retaliation.

LINAK requires its business partners to apply similar measures.



## **Child labour and juvenile work**

LINAK requires its employees and suppliers to combat child labour and restrict juvenile work.

LINAK:

- Prohibits the use of child labour in its supply chain. This means that no children can be employed if they are under the age of 15 or the applicable legal working age or have not yet completed compulsory schooling.
- Ensures that juveniles between 15 and 18 years are employed only according to local legal regulations and the International Labour Organization's (ILO) regulations concerning minimum age. Juvenile employees must only be engaged in light work, not work excessive hours or at night, and must not be involved in any hazardous work. Employment must not negatively affect the juvenile's upbringing and educational opportunities.
- Verifies new employees' dates of birth through official identification. LINAK documents this information in personal files.
- Implements a remediation process if child labour is found in LINAK operations or supply chain, guaranteeing the best interests of the child involved.

LINAK requires its suppliers to apply similar measures.

## **Working conditions**

LINAK requires its employees and suppliers to provide adequate working conditions.

LINAK is dedicated to fair and competitive employment conditions. LINAK therefore ensures equitable terms of employment, by:

- Providing wages that meet or exceed national legal minimums. In the absence of statutory guidelines, wages that adhere to prevailing trade or industry standards or collective agreements.
- Complying with legal limits and relevant collective bargaining agreements for regular and overtime hours.
- Ensuring provision of legally mandated breaks, days off, and leave.
- Offering social benefits that comply with national or local legal standards or in the absence of official standards, are comparable to those established within the industry or by collective agreements.
- Providing accurate pay statements that detail hours worked and corresponding rates, in accordance with legal requirements.
- Verifying the legality of employees' work status by securing appropriate visas, work permits, and any other necessary documentation.

LINAK requires its suppliers to apply similar measures.

### **Freedom of association and collective bargaining**

LINAK requires its employees and suppliers to uphold freedom of association and collective bargaining consistent with applicable laws.

LINAK:

- Respects the freedom of association, allowing employees and management to organise among themselves to protect their interests. LINAK honours every employee's right to join or not join trade unions, elect representatives, and participate in collective negotiating or union activities without the risk of being subject to threats, reprisals, discrimination or any other kind of interference.
- Is dedicated to fostering a culture of transparency and mutual respect, including upholding employees' rights to engage in an open and honest dialogue, negotiation, and collaboration with their superiors.
- Promotes open exchanges through collective bargaining to agree on employment terms and rewards.

LINAK requires its suppliers to apply similar measures.

### **Discrimination and bullying**

LINAK requires its employees and suppliers to combat discrimination and bullying in the workplace.

It is essential for LINAK to have a work environment free from harassment, violence, or bullying, whether verbal, physical, written, or psychological.

LINAK:

- Encourages an inclusive and non-discriminatory work environment.
- Requires that every person be treated impartially and fairly, with their dignity and respect upheld.
- Requires that discrimination in hiring, promotions, and disciplinary actions is avoided, and decisions are based on skills and performance.
- Has established policies and safeguards to prevent harassment, providing employees and management with the necessary awareness and skills.
- Has implemented reliable and accessible mechanisms for employees to voice concerns and report grievances.

LINAK requires its suppliers to apply similar measures.

## **Conflict minerals**

LINAK requires its employees and suppliers to eliminate the use of conflict minerals.

Conflict minerals are tantalum, tin, tungsten, and gold (3TG), which originate from conflict-affected areas, such as the Democratic Republic of Congo.

While LINAK does not procure minerals directly from smelters, LINAK sources components from suppliers that contain 3TG's. Therefore, LINAK:

- Follows the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Avoids using minerals and metals linked to conflicts.
- Verifies that minerals and metals are not sourced from conflict-affected or high-risk areas.
- Conducts thorough source and chain of custody reviews for conflict minerals and metals.
- Ensures transparency by providing documentation and evidence of due diligence upon request and disclosing the origins and sourcing routes of the minerals and metals in their products.
- Ensures that its operations do not support human rights abuses.

LINAK requires the same of its suppliers.



# 2. Working with integrity

## **Bribery, facilitation of payments and excessive gifts**

LINAK prohibits its employees and business partners to use bribes, facilitation payments, and give excessive gifts.

Offering or accepting bribes, facilitation payments, and excessive gifts is illegal in most countries and can result in severe penalties, including fines and imprisonment. Beyond legal consequences, such actions can severely damage the reputation of the companies involved, resulting in loss of business, customers, and partnerships.

Accordingly, LINAK prohibits its employees to:

- Give or accept bribes. 'Bribes' are anything of value offered to influence someone for personal or professional gain.

If you are offered or requested to give a bribe when doing business for or with LINAK, you must always refuse and report it to LINAK.

- Make facilitation payments. 'Facilitation payments' are small bribes offered to public officials to expedite administrative processes that LINAK is already entitled to.

If asked to make a facilitation payment, reject the request and question its legitimacy, e.g. by requesting a receipt. If facilitation payments are made under threats when doing business for or with LINAK, report the incident to LINAK.

- Offer or accept excessive gifts, hospitality, or entertainment. 'Excessive gifts' are any gifts or hospitality offered by or to you. Such gifts, hospitality, or entertainment must be legal, appropriate, inexpensive, infrequent, and unable to affect any business decisions made – also if assessed from an outside perspective.

When offering hospitality to a business partner, ensure there is a clear business purpose and connection, such as standard lunch following a meeting.

Never give gifts in the form of cash or cash equivalent, like gift cards.

LINAK requires the same of its business partners.

## **Conflicts of interest**

LINAK requires its employees and business partners to be transparent about any conflict of interest.

LINAK requires its employees to avoid any conflict of interest by always being transparent about the existence of such.

A conflict of interest can arise when your personal interests can potentially influence the decisions you make while working for or with LINAK. Conflicts of interest can lead to loss of trust between business partners and loss of reputation due to scandals, negative publicity, and loss of credibility, which can have long-term detrimental effects on the business.

Potential conflicts of interest may arise in various situations, including but not limited to 1) a LINAK employee having a close relationship to an employee of a supplier or customer (maybe friend or family), or 2) a former LINAK employee who has become a supplier or customer to LINAK.

A conflict of interest can vary in intensity and, consequently, in its potential to influence the decisions made. Transparency about any conflict of interest is important, as it improves the trust between the business partners and allows them to jointly decide on how to handle the conflict. By being transparent about even the smallest conflict of interest, you not only protect LINAK and its business partners but also yourself.

Therefore, notify your LINAK contact if you suspect a conflict of interest.

LINAK requires the same of its business partners.





# 3. Environment

LINAK requires its suppliers to reduce impact on the environment.

Environmental considerations are important for LINAK. LINAK expects its suppliers to share this commitment by taking steps to minimise the environmental impact of their manufacturing processes.

Below are some examples of actions LINAK takes;

- Work to reduce material consumption.
- Ensure that all chemicals and hazardous materials are handled, stored, and disposed of in an environmentally safe manner and in compliance with legal requirements.
- Ensure that emissions, including carbon emissions, are monitored, controlled and reduced whenever feasible.
- Ensure that wastewater and solid waste generated from operations, industrial processes, and sanitation facilities are monitored, controlled, treated, and disposed of or discharged in compliance with legal requirements.
- Promote recycling and reuse of materials and products to the greatest extent possible.

LINAK requires its suppliers to take similar actions.

# 4. Fair business practice

## **Intellectual property rights and confidentiality**

LINAK requires its employees and business partners to protect and respect intellectual property rights and confidentiality.

LINAK requires its employees to handle the intellectual property rights and confidential information of LINAK and its business partners with diligent care, as a minimum through maintaining an efficient information security system to adequately protect data from risks, such as destruction, theft, unauthorised access, unauthorised disclosure, or other misuse.

LINAK requires its employees to promote market behaviour in which business partners respect each other's intellectual property rights, compete by making genuine improvements and developments, and avoid infringements.

LINAK requires the same of its business partners

## **Data privacy**

LINAK requires its employees and business partners to process and protect the data privacy of any person in an orderly and secure manner.

LINAK requires its employees to strictly comply with applicable laws on data privacy. This includes, but is not limited to, the basic principles:

- Personal data processing must be reasonably required and proportionate compared to the need for the processing.
- Personal data processing must be limited to a specific timeframe, including efficient destruction procedures.
- The integrity of the personal data must be maintained, ensuring that data is accurate, complete, and reliable, and that it is not altered or tampered with in an unauthorised manner.
- The processing must serve a clear business purpose and be relevant to that purpose.

LINAK requires the same of its business partners.



### **Competition law**

LINAK requires its employees and business partners to uphold the principles of free and fair competition and to comply with competition laws.

The access to participate in a fair and free competition as well as the protection against unfair competition is essential for any business.

LINAK requires its employees to strictly comply with applicable competition laws. This includes but is not limited to:

- Do not enter into anti-competitive agreements.
- Do not engage in concerted practices with competitors, suppliers, customers, or other business partners.
- Do not abuse any dominant market position.

LINAK requires the same of its business partners.

### **Export control and sanctions**

LINAK requires its employees and business partners to comply with applicable sanction regimes and export control laws.

It is crucial for LINAK as well as our business partners that we can rely on each other in complying with sanction regimes and export control laws. And we will supply all required information to ensure compliance.

LINAK requires:

- Recognition and compliance with applicable sanctions regimes and export control laws.
- Collaboration on assessing and mitigating risks associated with sanctions regimes and export control laws.
- Due diligence when selecting suppliers and ensuring that sanctioned entities and individuals are avoided.

LINAK requires the same of its business partners.

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Built by market leading experts, using state-of-the-art technologies and perfected production methods, you can expect the same quality worldwide.



Innovation is in our core. We take the lead and have the courage to make it real.



We are responsible in what we do – towards customers, employees, and the environment. Creating trust is a natural part of who we are.



From global presence to local understanding. We believe in world-wide support and being close to our customers.