

Ethics Handbook

- Guidelines for good behaviour at LINAK



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Built on respect and responsibility



It means everything to me to have a company we can be proud of. At LINAK®, we strive to grow and do business in the proper way. We must be able to stand by the demands we place on our employees and the environment in which they work. Our company should foster a positive atmosphere while remaining efficient and quality conscious.

We aim to set an environmental example by minimising CO2 emissions to the greatest extent possible. This includes reducing internal energy consumption in our processes and the heating of our buildings.

I would hate to profit at the expense of our employees' health. We are also not interested in working with

subcontractors who create poor working environments. Our employees should be content and have safe working conditions both physically and mentally. With several subsidiaries, we also strive to be among the best workplaces in the countries where we operate.

I feel a great responsibility to support the local community, and we do so wherever we can. We could not have created LINAK without all the people who are a part of the company and who have helped turn LINAK into what it is today.

Best regards,

Bent Jensen, Himself



Welcome to the Ethics Handbook

By Jette Jensen and Lars Uhd Nørgaard



This Handbook sets the standards for how we at LINAK® define ethical behaviour, act responsibly, and interact with our customers, partners, colleagues, and the local community. It lays out the ethical guidelines for how we should behave.

Think of the Handbook as a quick overview of how we expect LINAK employees to act and make decisions that align with our company culture. We understand that you may face questions or dilemmas that are not covered here. When that happens, it is important to involve your superior so you can find the right way to handle the dilemma together.

Every LINAK employee should follow these ethical guidelines, and it is the responsibility of each superior to make sure their employees understand the ethical guidelines. All LINAK employees will receive training on the contents of this handbook, and those likely to encounter ethical dilemmas will receive regular training.

Why the LINAK values are important

Our customers have an interest in how we act and respond in ethical dilemmas. We are often asked how we ensure that we are a responsible business – and those inquiries are more and more frequent. As our company is already based on sound values, we actually have an advantage compared to many of our competitors.

At LINAK, we have always believed in treating each other with decency and conducting our business with integrity. Our core values include “Loyalty, openness, and honesty” and “Job satisfaction and helpfulness”. We take pride in these values and believe they have significantly contributed to making LINAK the successful company it is today. As an international company, we respect the cultural differences in the various countries where we operate. As a socially responsible organisation, LINAK aims to positively influence the world wherever we can.

The rules and expectations we set for ourselves are the same ones we expect our business partners to adhere to. That is why we have also made a Code of Conduct that our suppliers must adhere to. Our Code of Conduct outlines the LINAK commitments to a number of ethical and sustainability topics.

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Ethical guidelines

At LINAK®, we believe in being open and honest. This means our business practices must be transparent and fair, not just for our employees but also for our partners. We expect all our employees to adhere to these ethical guidelines.

Below is a breakdown of what we focus on when it comes to business ethics, and how you can represent LINAK in your decisions.

Business ethics at LINAK

- 1. No bribery or facilitation payments**
Do not give, offer or accept payments to gain an edge.
- 2. Gifts and donations**
Accept only small, reasonable gifts that reflect common hospitality. We donate money only to charity, not to influence decisions.
- 3. Avoid conflicts of interest**
Do not give unfair advantages to people you have close ties with or to companies where you have a financial stake.
- 4. No misrepresentation or cheating**
Do not falsify records or engage in fraud.
- 5. Fair competition**
Compete fairly and avoid illegal or unethical agreements.
- 6. Respect privacy and data privacy**
Protect personal information and share only when absolutely necessary and/or required by law.
- 7. No theft, embezzlement, or fraud**
Do not misuse company funds or property.
- 8. Respect intellectual property and confidentiality**
Protect the intellectual property and confidential information of LINAK and our customers.

Ethical dilemmas

No matter how many guidelines and examples we make, it is only natural that a situation can arise, which brings us in doubt.

Below you will find some situations that will guide you to make the right decision.

Bribery and facilitation payments

- **Q:** A potential customer has asked for an unofficial 'fee' in order to handle our offer. What do I do?
A: You cannot do that! As a representative for LINAK you must not bring yourself in situations where you can be subject to a claim of bribery
- **Q:** A customer from a public sector tells me that we will win a contract, if we donate money to a hospital. What do I do?
A: You decline. We only donate to charity without expecting any business advantage.
- **Q:** I am offered information about other bids for a small fee. What do I say?
A: You decline and inform the person that this could have serious legal consequences.

Gifts

- **Q:** My supplier gave me an iPad. Can I accept it?
A: No, you cannot accept a gift of that size. When you accept gifts, you must estimate if they are of a reasonable value. If the gifts are of a value where others can question your objectivity with regard to future business, you should not accept them. As a rule of thumb, a reasonable gift size is what corresponds to three bottles of red wine. If you are in doubt, ask your superior.

- **Q:** I have been invited to a partly social event by a supplier (e.g. go-cart race, dinner in town and the like). Can I go?
A: Yes, but make sure it is reasonable and justifiable. If in doubt, ask your superior.
Q: A university asks for free LINAK products. Can I give them some?
A: LINAK wants to support learning and development and also donate products to institutions for training and educational purposes. But it always depends on the extend, and therefore, you should always involve your superior in the decision.

Conflicts of interest

- **Q:** My uncle's company has a product relevant to LINAK. Can I do business with him?
A: LINAK can do business with your uncle's company, but you should stay out of the decision-making process.
- **Q:** Can I buy a LINAK product on behalf of a friend?
A: No, employee discounts are for personal use only. You cannot pass on this benefit to your friends.

Misrepresentation and cheating

- **Q:** I discover that a product does not live up to the specifications we have stated. What do I do?
A: You must always point out to your superior if you discover that our products do not live up to the specifications.
- **Q:** I discover that there is an error in the accounts or stock. What do I do?
A: You must always point out to your superior if you discover any deviations in order to straighten things out.

Fair competition

- **Q:** A competitor invites me to their stand at an exhibition to meet their development manager. Can I go?
A: Yes, you can go but keep the conversation formal and avoid discussing sensitive information like strategies, product secrets, and prices.
- **Q:** A former employee offers confidential documents from a competitor. What do I do?
A: Decline the offer and inform them that this could have serious legal consequences.

Privacy and data privacy

- **Q:** A business partner asks for a colleague's home address. What do I do?
A: Share it only if you have the colleague's permission.
- **Q:** I have lost my laptop with sensitive information on a business trip. What do I do?
A: Immediately report it to LINAK IT and our Data Protection Officer.
- **Q:** I want to use photos of colleagues in marketing material. What do I do?
A: Get their permission and have them sign a consent form.

Theft, embezzlement, and fraud

- **Q:** I have seen a colleague take home actuators from LINAK. What do I do?
A: Ask your colleague if he has received approval from his superior. If this is not possible, then inform your superior directly about the situation.

- **Q:** Can I take home used applications (bed, lifting column etc.), if the customer agrees?
A: Yes, but only with the customer's consent and a written approval from LINAK.

Intellectual property and confidentiality

- **Q:** A customer wants to see another customer's application. What do I do?
A: You decline. You must protect the confidentiality of all customers, partners and the like.
- **Q:** A former colleague offers information about a competitor. In return, the colleague would like me to put in a good word for him for a new job opening. What do I do?
A: You decline. Competitor information must always be collected in an ethical way.

If in doubt

It goes without saying that the above examples are only for illustration and not exhaustive. As a rule of thumb, you should always use your common sense.

If you are in doubt, ask yourself the following questions.

- Is it OK according to laws, rules, and policies?
- Am I being loyal to LINAK?
- Can I justify my decision to others?
- Is my decision consistent with our LINAK values?

If the answer is "No" to any of the above questions, then you should definitely choose another solution. However, if still in doubt, always consult your superior.

Whistleblower

If you know of any LINAK® employees or business partners not following the Ethics Handbook, and you do not feel comfortable reporting it to your superior or prefer to stay anonymous, you are welcome to report it to the LINAK Whistleblower scheme.

Reports should be based on accurate information and made in good faith.

We kindly ask you to include your name in the report, but it is all your choice. Irrespective of included name or not, all reports are treated strictly confidential.

LINAK employees can contact the LINAK Whistleblower Coordinator or the HR Department for advice on handling any difficult situation related to business ethics or applying company policies in specific situations.

For more information, go to <https://www.linak.com/sustainability/whistleblower/>

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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.