

# AAK Group Code of Conduct for Suppliers of Non-Oil Goods and Services

## Introduction and Purpose

At AAK, we believe integrating sustainability, environmental responsibility, respect for human rights, and business ethics into our everyday activities is fundamental for our purpose, Making Better Happen™, and our vision of being the first choice for plant-based oil solutions.

The purpose of AAK's Group Code of Conduct for Suppliers of Non-oil Goods and Services (the "Code") is to define our business conduct requirements for these suppliers.

We expect all our non-oil suppliers to comply with the ethical business conduct, human rights and environmental requirements outlined in this Code. We seek to guide our suppliers in how to interact with stakeholders, make the right decisions and remain true to AAK's ethical and business commitments. Through the implementation of this document, AAK aims to prevent and mitigate adverse human rights and environmental impacts in our supply chains, to foster a sustainable future and ensure ethical business conduct.

In AAK, we comply with applicable local laws and regulations in every country we operate in, and we expect our suppliers to do the same in their relevant business operations. In situations where domestic laws conflict with international standards, suppliers are expected to respect international standards subject to applicable laws.

The Code is updated in line with Double Materiality Assessment results and as international standards, national or supranational regulations or industry standards evolve. The Code is approved at Executive Committee level in AAK.

### AAK's policies and commitments are outlined in:

- AAK Group Code of Conduct
- AAK Group Anti-Bribery and Corruption Policy
- AAK Environmental Policy
- AAK Group Human Rights Policy
- AAK Group Sanctions Policy
- AAK Group Anti-Money Laundering Policy

These and other supporting AAK codes and policies are available AAK website to inform all stakeholders.

### AAK is committed to adhering to and upholding:

- The UN Global Compact principles
- The International Bill of Human Rights
- The ILO Declaration on Fundamental Principles and Rights at Work
- The UN Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises (UNGP)
- The UN 17 Sustainable Development Goals
- The Science Based Targets Initiative



"This will lead to progress in the spirit of our purpose:  
Making Better Happen"

Yours faithfully, AAK AB (publ.)  
Malmö, June 2025

Johan Westman, President and CEO

# 1 Scope and Applicability

The requirements defined in this Code apply to suppliers who have a contractual obligation to deliver non-oil goods and/or services to AAK. This includes parties or people acting on behalf or representing the contracting supplier. This Code does not apply to suppliers under the scope of our separate Code of Conduct for responsible sourcing of plant-based oils. This Code is developed based on impact, risk and opportunity analysis of our supply chain, in line with the Double Materiality Assessment requirements in the EU Corporate Sustainability Reporting Directive (CSRD).

*Requirements* defined in this Code are the minimum standards our suppliers must comply with to become and remain a supplier to AAK. *Aspirations* are AAK's recommendations beyond the minimum standards to encourage our suppliers to further develop their sustainability initiatives.

## 2 AAK's Risk-based Approach to Due Diligence

AAK takes a risk-based approach to due diligence. We understand that our suppliers may vary in their maturity levels concerning the expectations outlined in this Code, and we recognize that transitioning to meet these standards may require time. Additionally, it is important to note that certain elements of the Code may not apply to all our business partners, depending on their products, services, or industry. Any measures implemented should be appropriate to the supplier's specific sector and size.

## 3 Demonstration of Compliance

Suppliers are expected to maintain the documentation necessary to demonstrate their compliance with the requirements of this Code, and to have the necessary management systems, policies and their own due diligence in place to ensure ethical business conduct in their own operations and in their supply chain, appropriate to their business and size. Proof of action and governing documentation must be made available to AAK upon written request and should be available from the moment of potentially entering into a business relationship with AAK. AAK reserves the right to conduct on-site assessments of our suppliers and their supply chain including with external third-party assessors.

We expect our suppliers to work with us with a collaborative mindset, focus on continuous improvements and be transparent and proactively open about challenges they may face in their operations. Our suppliers must cooperate with AAK in connection with the performance of risk and/or impact assessments, reporting, monitoring, stakeholder engagement and grievance mechanisms, and they must implement steps to mitigate any risks identified.

Should a supplier fail to demonstrate a commitment to meet the requirements of the Code, AAK will try to solve the situation through dialogue and cooperation or as a last resort terminate the relationship.

Regular supplier engagement programs to convey Code compliance and expectations, covering Human Rights/Social, Environmental and Governance topics are conducted by AAK where needed.

Any area causing concern or requiring clarification should be addressed to your local AAK contact.

## 4 Grievance Mechanism

Should a supplier, their employees or other external stakeholders have a concern or encounter a material violation or misconduct of laws, legal requirements or this Code, they should communicate this to AAK personally or anonymously. The reporting channel can be reached here: <https://report.whistleb.com/en/aak>. Anyone can report without fear of reprisal, and the necessary confidentiality and anonymity will be assured.

Relevant suppliers to AAK are required to have a transparent and fair grievance mechanism in place. The supplier's grievance mechanism must be communicated to all stakeholders and cascaded down the supply chain. Grievances shall be addressed in an effective, timely, transparent and equitable manner. The confidentiality of any complainant must be guaranteed and protected from abuse, threats, intimidation or reprisal. Mitigation and remediation of negative human rights impacts shall be handled in accordance with UN's guiding principles on Business and Human Rights.



## 5 Ethical Business Conduct

AAK believes in fair competition and is committed to carrying out its activities in a manner consistent with all applicable competition laws and regulations. AAK has zero tolerance for corruption and money laundering and is committed to working against it in all its forms. Any evidence of corruption will be addressed with immediate effect.

### Legal compliance

#### *Requirements*

All applicable national and local legal requirements including, but not limited to, laws and regulations concerning anti-bribery and corruption, anti-money laundering and counter-terrorism financing must be complied with. If local, national or international laws, regulations or rules take a more demanding position on matters contained in this Code, these shall be observed and complied with. In situations where international standards conflict with domestic laws, suppliers shall seek ways to respect international standards subject to applicable laws.

### Fair competition and business dealing

#### *Requirements*

Suppliers shall not engage in any illegal anti-competitive practices, such as price manipulation and comply with all antitrust and competition law provisions.

### Anti-bribery and corruption

#### *Requirements*

Suppliers shall not engage in any form of corrupt practice including extortion and bribery. Suppliers shall not, directly or indirectly, offer, promise, give, or demand any remuneration, bribe, anything of value or other undue advantage to obtain or retain business or other improper advantages. Gifts must never be offered or accepted if the giving or acceptance entails a risk that such gift may be viewed as undue influence on business transactions or conducts by the giving or receiving party. All actions must always be in line with applicable local laws and customary business practices. All kinds of compensation to suppliers and partners are based on verifiable supply of products and/or services only. Any conflict of interest involving AAK must be duly reported to AAK and avoided, this includes private activities, financial interests or relations.

#### *Aspirations*

An effective conflict of interest policy and organizational processes to prevent and mitigate conflicts are maintained.

### Anti-money laundering

#### *Requirements*

All financial transactions with AAK shall be carried out in accordance with applicable anti-money laundering laws and regulations and suppliers shall not take part in or be complicit in any activities of money laundering, involving AAK or otherwise.

### Responsible trade and taxation

#### *Requirements*

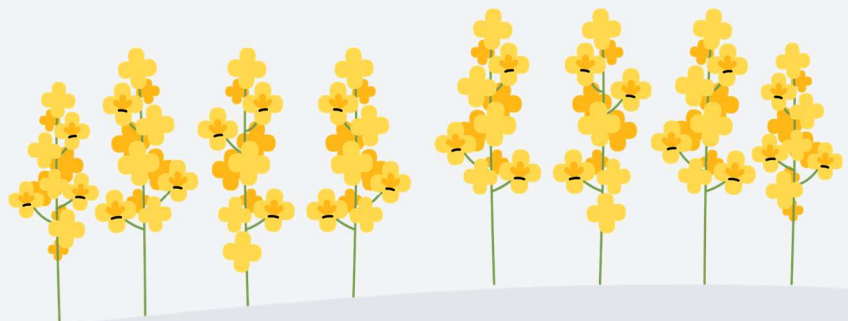
All applicable import and export laws, tax laws and regulations covering areas such as rules of origin, customs classification of goods, customs valuation, export control classification, restricted party screening, embargos and sanctions must be complied with.

### Compliance with international sanctions

#### *Requirements*

No AAK supplier, their affiliates, respective officers or directors may be, or be owned or controlled by, a person or entity specially designated, blocked or otherwise individually targeted under any economic sanctions or export control laws or regulations of the UN, US, EU, UK, or any other relevant jurisdiction (a "Listed Person").

No product entering AAK's supply chain may have been directly or indirectly sourced or otherwise originated from, a sanctioned country/area as per AAK's Group Sanctions Policy, entity or any Listed Person.



## 6 Human Rights

### *Requirements*

Suppliers shall comply with applicable laws and regulations and internationally recognized human rights principles.

In situations when international standards conflict with domestic laws, we expect our suppliers to seek ways to respect international standards subject to applicable laws. In addition, where standards differ, we expect our suppliers to provide the highest level of protection of rights holders.

### Child labour and forced labour

#### *Requirements*

No Forced Labour, such as bonded labour, prison labour, slavery, human trafficking or retention of important personal documents of employees.

No Child Labour. Children shall be free from physical, sexual, and emotional abuse or exploitation damaging their mental and physical health. The minimum age of employment shall not be less than the age of completion of compulsory schooling and in any case not less than 15 years (14 years in accordance with local jurisdiction regulations). Children aged 13 or over (or aged 12 or over in countries that have set the minimum age of employment at 14) can perform only light work where this is permitted by local law.

### Freedom of association

#### *Requirements*

Workers shall have freedom of association and the right to collective bargaining under the provisions of national and international conventions, without fear of discrimination or other forms of retaliation. Where the right of freedom of association is restricted by law, the employer must allow for alternative forms of association, independent social dialogues amongst workers and bargaining by selected representatives.

### Discrimination & harassment

#### *Requirements*

Respect the rights of all workers, including temporary, third party, contractual, and migrant workers. No discrimination on grounds of race, color, religion or belief, ethnic or social origin, genetic features or colour, political opinion, nationality, membership of a national minority, language, age, property, birth, physical ability or disability, gender identity, sexual orientation, marital status, trade union participation, HIV status, pregnancy or any other form of discrimination.

Protect employees at the workplace against physical, verbal, sexual or psychological harassment, abuse or threats.

### Health and safety

#### *Requirements*

Workers are provided with a safe and adequate healthy workplace environment, considering the risks and occupational hazards of the relevant type of work such as physical, chemical, biological and structural hazards.

Suppliers shall have appropriate procedures in place to identify and reduce risks and prevent accidents and injuries associated with the work. Workers shall have access to potable drinking water and adequate sanitation.

If accommodation or transportation is provided to workers, this shall meet IFC Standards for Workers' Accommodation and national laws and regulations on accommodation and transportation.

### Working hours, wages and benefits

#### *Requirements*

Working hours, rest time, overtime and leave are compliant with the applicable laws and regulations and industry standards in the country/industry of operation.

Wages and benefits (including in-kind) paid for a standard working week meet at least the legal or the minimum industry standards, or the requirements set out in the collective bargaining agreements (where applicable), whichever is higher, this includes where workers are paid based on volume output, piece-rate, quotas or similar. Wages are paid, on time, regularly and in full.

### Privacy

#### *Requirements*

Maintain the privacy of all workers, refraining from disclosing or using their personal information for any purpose other than the intended business transaction, and implementing appropriate security measures to safeguard such information.

### Affected communities

#### *Requirements*

Respect the rights of indigenous peoples and local communities as protected in the United Nations Declaration on the Rights of Indigenous People. This includes, among others, rights to property, culture, self-determination, self-governance, a healthy environment, non-discrimination, and full and effective participation in the decisions that affect them.

## 7 Environment

AAK is committed to reducing our climate impact and with our approved Science Based Target (SBTi) in place for Scope 1, 2 and 3 emissions we commit to reduce emissions in our own operations and our supply chain. We expect our suppliers to do their utmost to reduce the environmental impact caused by their business operations, including impact on people, property and nature, to continuously seek more sustainable options and to have systems and tools in place to monitor their environmental impact and performance.

### Climate impact management

#### *Aspirations*

AAK encourages suppliers to measure and monitor greenhouse gas (GHG) emissions, to set timebound SBTi targets for scope 1-3 GHG emissions in line with the UN Paris Agreement and measure the carbon footprint of the products or services sold to AAK. Such efforts should target to minimize energy usage and the use of fossil fuels and maximize natural resource efficiency.

Supporting documents and proof of action regarding climate mitigation actions are shared with AAK upon request, with truthful and reliable data, acknowledging that the data may be used by AAK in its own SBTi reporting and greenhouse gas accounting.

### Hazardous substances and waste management

#### *Requirements*

Hazardous materials, chemicals and dangerous substances are stored, handled, recycled, reused, and disposed of safely in accordance with legal requirements and based on manufacturers' recommendations. Continuously seek to minimize and substitute highly hazardous materials and to prevent their pollution into air, water and soil from production facilities.

Ensure waste from production facilities is adequately reused or recycled where technically feasible and disposed of in an environmentally friendly manner.

#### *Aspirations*

Reduce pollution of microplastics.

### Resource efficiency & biodiversity

#### *Requirements*

Ensure efficient and sustainable use of natural resources such as water, energy and materials.

Applicable materials and ingredients supplied to AAK comply with the deforestation- and conversion- free requirements with all relevant applicable laws, regulations relating to land-use rights and environmental protection, forest-related regulations, including forest management and biodiversity conservation.

#### *Aspirations*

Set targets and commitments to minimize and optimize the use of natural resources, with reportable monitoring and tracking of progress towards such targets.

### Permits

#### *Requirements*

Suppliers shall obtain and maintain all required permits, licenses, and registrations required for ongoing business operations in their respective country and industry.

## 8 Confirmation of Compliance

"We have read, understood and confirm that we comply with this Code, and we will support AAK with the necessary documentation to demonstrate compliance"

Date:	Group name/ parent company:	Relevant for subsidiary companies:	Name and function:	Stamp and signature:



## AAK Policies and Statements

<https://www.aak.com/sustainability/policies-codes-and-statements/>

AAK Group Code of Conduct

AAK Group Anti-Bribery and Corruption Policy

AAK Group Anti-Money Laundering Policy

AAK Group Sanctions Policy

AAK Group Environmental Policy

AAK Group Human Rights Policy

AAK Group Grievance Management Procedure

AAK Whistleblower channel

<https://report.whistleb.com/en/aak>

## External References

The UN Global Compact principles

<https://unglobalcompact.org/what-is-gc/mission/principles>

The International Bill of Human Rights

<https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

The ILO Declaration on Fundamental Principles and Rights at Work

<https://www.ilo.org/about-ilo/mission-and-impact-ilo/ilo-declaration-fundamental-principles-and-rights-work>

The UN Guiding Principles on Business and Human Rights

[https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf)

The OECD Guidelines for Multinational Enterprises (UNGP)

[https://www.oecd.org/en/publications/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_a0b49990.html](https://www.oecd.org/en/publications/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_a0b49990.html)

The UN 17 Sustainable Development Goals

<https://sdgs.un.org/goals>

The Science Based Targets Initiative

<https://sciencebasedtargets.org/>

EU Corporate Sustainability Reporting Directive (CSRD)

[https://finance.ec.europa.eu/capital-markets-union-and-financial-markets/company-reporting-and-auditing/company-reporting/corporate-sustainability-reporting\\_en#legislation](https://finance.ec.europa.eu/capital-markets-union-and-financial-markets/company-reporting-and-auditing/company-reporting/corporate-sustainability-reporting_en#legislation)

UN Security Council Sanctions List

<https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list>

US Office of Foreign Asset Control Sanctions List

<https://sanctionssearch.ofac.treas.gov/>

EU Sanctions List

<https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions?locale=en>

The UK Sanctions List

<https://www.gov.uk/government/publications/the-uk-sanctions-list>

International Finance Corporation Standards for Workers' Accommodation

<https://www.ifc.org/en/insights-reports/2000/publications-gpn-workersaccommodation>

United Nations Declaration on the Rights of Indigenous People

[https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP\\_E\\_web.pdf](https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf)

The United Nations Paris Agreement

<https://unfccc.int/process-and-meetings/the-paris-agreement>