



**FM Mattsson**  
GROUP

**Business Partner Code of Conduct**

## FM MATTSSON GROUP – BUSINESS PARTNER CODE OF CONDUCT

Dear valued business partners,

At FM Mattsson Group, our vision is to be customer's first choice for bathrooms, kitchens and associated areas. We work hard to ensure we have the happiest customers and most dedicated employees in the sector, and to create sustainable yet profitable growth by focusing on our customer offering, our employees and working culture, sustainability, and efficiency.

Our business concept is offering strong brands with a wow factor that customers are willing to pay a little more for. Our values – the customer comes first, we win together, and I step forward – guide us in our day-to-day work. These values reflect our commitment to sustainable development and guide us in conducting our business in an ethical and upright manner.

Our business partners play a vital role in the way we conduct our business and deliver value to our stakeholders. We strive to work with business partners who share a similar commitment to responsible business practices. Through this Business Partner Code of Conduct, we communicate the minimum requirements that we expect our business partners to follow while conducting business in an ethical, social and environmentally responsible manner.

Our Business Partner Code of Conduct is based on the following:

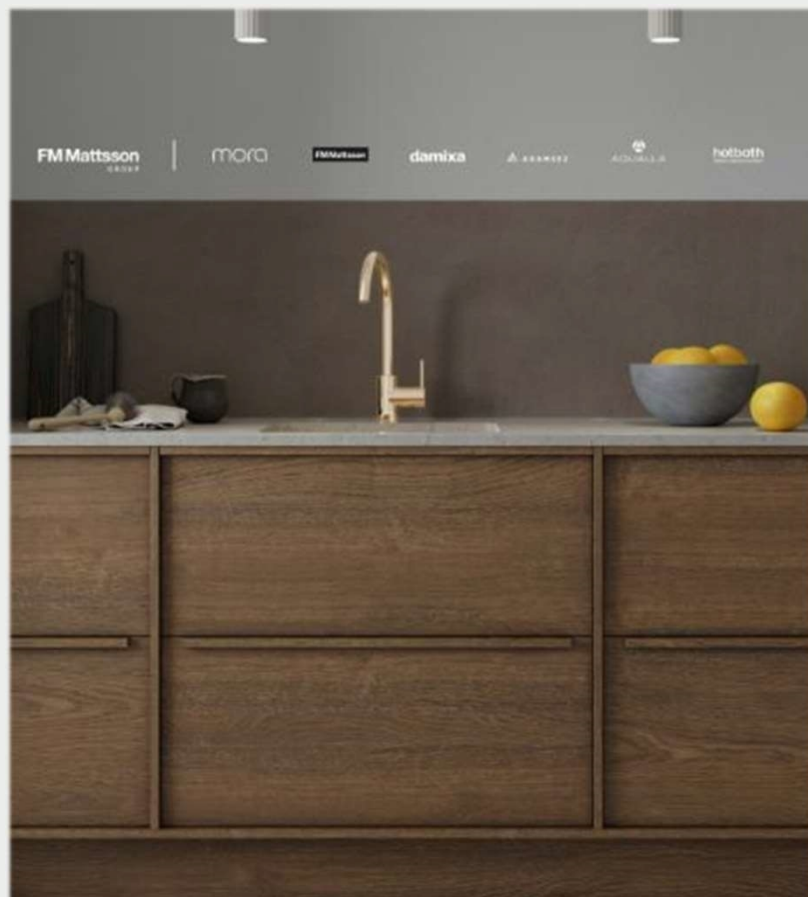
1. The UN's Universal Declaration of Human Rights and the associated UN conventions.
2. The International Labour Organization's (ILO) Fundamental Principles and Rights at Work.
3. The OECD Guidelines for Multinational Enterprises.
4. The UN Global Compact's Ten Principles covering human rights, labour, the environment and anti-corruption.

We require our business partners to commit and act in accordance with the requirements under this Code of Conduct and to extend a similar approach to their own value chain (e.g., suppliers, sub-contractors and agents). Our partner engagement practices are designed to partner with our business partners through a continuous improvement approach and support them to meet our requirements.

As a valued business partner to FM Mattsson Group, we count on your support and commitment to continue adopting and developing responsible business practices. We also encourage you to go beyond mere compliance and strive for even higher standards of sustainable business.

CEO FM Mattsson Group, Fredrik Skarp  
May 2026

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### **Business partner compliance and auditing**

The Business Partner shall comply to the expectations and requirements in this Business Partner Code of Conduct.

If a Business Partner fails to meet our expectations as set out in the Code, our general approach is to encourage improvement. Critical deviations or repeated unwillingness to make improvement, however, may jeopardize the Business Partner's relationship with FM Mattsson Group.

Audits or assessments to follow up Business Partner compliance with this Code shall be accepted and supported by the Business Partner.

### **Compliance with laws**

The Business Partner must comply with the legal requirements and frameworks in place in the countries they operate in. If the Supplier Code of Conduct and legislation contradict one another, the legislation shall take precedence.

### **Competition law applicability note**

Business Partners must comply with applicable competition/antitrust laws (e.g., no price-fixing, market/customer allocation, bid-rigging or illegal resale price maintenance).

### **Reporting malpractice**

The Business Partner shall maintain an accessible reporting/whistleblowing mechanism available to workers and relevant third parties, enabling anonymous reporting where lawful, ensuring confidentiality, impartial handling, and protection against retaliation.

Where the Business Partner does not maintain its own mechanism, it shall make FM Mattsson Group's whistleblowing channel available to affected workers (incl. translated information) and notify FM Mattsson Group of this arrangement. Irrespective of the above, concerns relating to FM Mattsson Group may be reported directly via our whistleblowing channel:

[Whistleblowing – FM Mattsson Group](#)

## Business ethics

Our behavior must be characterised by responsibility and respect for our business partners and the local communities in which we operate, at all times, regardless of the country or market. Ethical conduct and good business practice are of utmost importance for sustainable development and profitability. The only factors we may use to convince our business partners are commercial arguments.



### Requirements:

- Business Partners shall not engage in, endorse nor tolerate any form of bribery or corruption including fraud, financial misconduct, money laundering or anti-trust, directly or indirectly.
- Business Partners shall not offer nor accept any form of improper benefit to or from a third party, private or public, with the purpose of obtaining or retaining business or any form of preferential treatment. Such benefits may comprise not only cash but also job opportunities, favors, travel, facilitation payments, promises to pay debts or unlawful gifts and entertainment.
- Neither FM Mattsson Group as a company, nor anyone acting on FM Mattsson Group's behalf, will accept, receive or request gifts or other benefits which could unduly influence commercial decisions.
- Business Partners shall respect FM Mattsson Group confidential information and intellectual property rights by safeguarding against misuse, mishandling, counterfeit, theft, fraud or improper disclosure in accordance with applicable law and the contractual terms with FM Mattsson Group.
- Business Partners must avoid any conflicts of interest between themselves and their own business partners.
- Business Partners must ensure that product information, claims and marketing communications in relation to products and services provided to or by FM Mattsson Group are accurate, not misleading and comply with applicable laws and industry standards.
- FM Mattsson Group does not trade with companies with EU sanctions against them or their ultimate beneficial owners. Nor does it trade with organisations based in Russia or Belarus or allow sales of its products, directly or indirectly, to customers there.

## Human rights and working conditions

FM Mattsson Group expects the Business Partner to actively ensure their employees are treated fairly, equally, and to respect all internationally recognized human rights and treat all people with dignity.

### Forced labour

#### Requirements:

- No form of forced labour including but not limited to slave labour, compulsory labour, involuntary prison labour, human trafficking or work linked to any form of punishment may occur in the Business Partner's operations.
- Employees shall have the right to leave the workplace at the end of their working hours.
- All work must be carried out of the individual's own free will and the employee shall be entitled to cease working after a reasonable notice period.
- FM Mattsson Group has zero tolerance for trafficking and works to safeguard human rights.

### Child labour

#### Requirements:

- FM Mattsson Group does not tolerate child labour and Business Partners shall prevent all forms of child labour.
- Employees under the age of 18 years must be protected from hazardous tasks that entail risks to health and safety. Work that is dangerous or harmful to children's health or development is prohibited under all circumstances. This also applies to work that could prevent children attending school.
- Any particular rules and requirements, such as applicable national legislation, other regulations or applicable collective agreements concerning employees under the age of 18 years, regarding issues such as working times, tasks, and other elements of the employment relationship, shall be adhered to unconditionally in all elements of operations.
- If child labour is discovered at our business partners, the employer must act in the child's best interests and immediately find suitable solutions in collaboration with the child and their family.

## Human rights and working conditions

### Fair employment practices

#### Requirements:

- Business Partners must promote fair employment practices, in terms of not just reasonable remuneration but also fair conditions regarding the scope and duration of the work.
- Business Partners must ensure that employment contracts, employment conditions, pay, and benefits adhere to national legislation, including collective agreements where applicable.
- Employees shall have the right to equitable remuneration, also known as a living wage, with a minimum wage constituting the lowest possible pay level where applicable.



### Diversity and inclusivity

#### Requirements:

- Business Partners must act to take active measures to achieve equal rights and opportunities in working life irrespective of gender, ethnicity, civil status, pregnancy, nationality, disability, trade union involvement, sexual orientation, religion or other beliefs.
- Discrimination, harassment and victimization, regardless of the reason, are never acceptable.
- Business Partners must ensure that all employees with the same experience and qualifications shall receive the same pay for the same work.
- We expect that the Business Partners shares our values and work actively to increase diversity and inclusivity, throughout all operations.

### Freedom of association and collective bargaining

#### Requirements:

- Business Partners must respect their employee's rights to organise or not organise themselves into trade unions and negotiate collectively or individually.
- No employee may be at risk of harassment or reprisals for exercising these rights.
- In countries where the freedom of association is restricted or under development, Business Partners must ensure that employees may meet with the company's management to discuss pay and working conditions without negative consequences.

## Responsible sourcing

This section applies where relevant to Business Partners that supply materials, components or finished goods to FM Mattsson Group.

Mining and trading of minerals and other raw materials can contribute to harmful impacts such as human rights violations and conflicts. Conflict minerals (tantalum, tin, tungsten and gold) are minerals from high-risk areas and areas experiencing conflict, the use of which directly or indirectly contributes to the financing of armed groups who are expected to commit serious human rights violations.

### Conflict minerals

#### Requirements:

- Business Partners must meet the requirements set out in applicable legislation and regulations concerning conflict minerals.
- Business Partners shall have a policy and process in place to ensure that any of these conflict minerals (tantalum, tin, tungsten or gold) delivered to FM Mattsson Group, do not directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses or in any other way directly or indirectly contribute to human rights violations.



## Environmental responsibility

*All business partners must comply with applicable environmental laws and permits. Upstream business partners must also follow the additional requirements below. We strongly encourage downstream business partners do the same and expect them to at least follow industry standards in these areas.*

At FM Mattsson Group, sustainability is integral to how we operate. We take environmental responsibility across our value chain and expect the same from our Business Partners. Partners must proactively manage impacts across operations, logistics, and relevant parts of the product life cycle linked to FM Mattsson Group products and services. Partners are expected to promote these commitments in relevant tiers of their own value chain.

### Requirements

**Climate & energy** – Business Partners must work towards lower greenhouse-gas emissions in operations and transport, improve energy efficiency, and increase the use of renewable energy where feasible.

**Resources & circularity** – Business Partners must strive to increase recycling rates, use materials efficiently and implement circular material and packaging flows. Extended producer-responsibility (EPR) e.g., packaging/WEEE/batteries must be met where applicable.

**Water stewardship** – Business Partners must use and discharge water responsibly, hold required permits where applicable, and work to reduce freshwater consumption over time, prioritising improvements in areas with higher water stress.

**Pollution & Hazardous Substances** – Business Partners must manage chemicals and hazardous waste safely, prevent pollution to air, water, and soil, and comply with applicable product-chemical regulations (including REACH and RoHS, where relevant). Partners should restrict substances of concern and phase out non-essential uses of SVHCs where technically feasible.

**Biodiversity & sensitive areas** – Business Partners must avoid negative impacts on protected areas and key habitats and apply risk-based controls in relevant raw-material chains.

**Data, cooperation & auditing** – Partners commit to transparent reporting of CO<sub>2</sub> emissions and other relevant environmental information related to FM Mattsson Group products and associated logistics/services upon request and cooperate with reasonable assessments or audits.



## Health and safety

FM Mattsson Group applies a systematic approach to ensuring a safe and healthy working environment. We expect that our Business Partners work systematically for a safe and healthy work environment for its employees.



### Health and safety

#### Requirements:

- Business Partners must make sure that risks that could lead to accidents or a deterioration in health are dealt with immediately. Workplaces shall be kept clean and production machinery safe.
- Business Partners shall provide instructions regarding personal protective equipment and working equipment to all employees.
- Dangerous materials, chemicals or equipment must be stored, handled and transported in accordance with applicable legislation. There must be access to first aid equipment to a sufficient extent.
- Business Partners shall have adequate emergency preparedness procedures in place in order to identify and assess potential emergency situations. Emergency plans, fire safety and preventive action plans shall be implemented, including employee safety training and evacuation drills.
- Fire safety procedures shall, where available, be periodically reviewed and approved by local authorities. Exits must not be blocked and must be well lit.
- Employees shall have ready access to clean drinking water, hygienic toilet facilities, hygienic food preparation, storage and eating facilities, adequate ventilation, light and temperature levels, and acceptable levels of noise and dust pollution (as applicable).
- All employees must be informed about safety measures, such as emergency exits, fire extinguishers, first aid equipment, etc.

## Document information

Policy Owner: Group CEO	Approved by the Board of Directors 2026-05-21	Review cycle: Annual
Type of document: Group Policy	Classification: Public	Document ID & version: G-POL-1347-v.1

### Governance & Oversight

This policy is implemented together with other related Group policies, including the Business Ethics Policy and the Environmental Policy. Certain areas are also governed by law. If requirements conflict, the strictest standard applies, whether from applicable law, this policy or other Group policies.

- Board of Directors:** Approves the policy, reviews related risks annually and is informed of serious breaches.
- CEO (Policy Owner):** Ensures implementation within the group, resources, monitoring and reporting to the Board.
- Sustainability function:** Provides guidance and oversees training.
- Business partner relationship owners:** Ensure relevant business partners are aware of the policy and monitor compliance.
- Business partners:** Follow this policy, seek guidance where required and inform Business partner relationship owner of breaches.

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**Business Partner's signature**

We hereby certify that we have taken note of FM Mattsson Group's Business Partner Code of Conduct and that we agree with the requirements and expectations.

On behalf of:

Business Partner name:

Signature: