



Human rights guideline

Adopted by the President and CEO of Luossavaara-Kiirunavaara AB (publ) January 25th 2024

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| Group guideline manager: | Senior Vice President, Sustainability |
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| Revision log | | |
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| 18/02/2021 | Version 1 – reworking an earlier policy, adaptation to new governing document template | Swedish, English |
| 18/10/2021 | Version 1.1 – editorial change to Purpose, 'limitations' changed to 'violations' | Swedish, English |
| 25/02/2022 | Version 1.2 – editorial changes to the template and update to Group guideline manager | Swedish, English |
| 27/01/2023 | Version 1.3 – editorial changes due to Norwegian legislation | Swedish, English |
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1. Introduction, purpose, scope

1.1 Introduction

As a state-owned company, LKAB has a duty to act in an exemplary manner in all markets, and this always includes respecting human rights. Owner requirements are stipulated in the ownership policy, which also states that companies are expected to follow international guidelines in this area.

1.2 Purpose

The purpose of this guideline is to support the work of effectively identifying and managing risks associated with direct and indirect infringements of human rights. The guideline must ensure that real, potential or perceived violations or negative effects on human rights are identified within the Group, in its value chain and in relation to the company's stakeholders. LKAB must also have a well-functioning process for managing and indemnifying impact identified.

The guideline also seeks to support communication and ensure compliance with the law and other requirements.

1.3 Scope

This Group guideline applies to all LKAB Group employees. This also includes collaboration with parties with whom business relationships arise, and it applies throughout the value chain.

Furthermore, it covers work with those stakeholders upon whom LKAB has the ability to exert an influence, both internally and externally. The stakeholders concerned are suppliers, customers, agents and other partners. The degree of influence that can be exerted governs our level of responsibility.

2. Definitions

| Term | Definition |
|--------------------------------|--|
| Human rights | According to The Universal Declaration of Human Rights (UDHR) https://www.un.org/en/universal-declaration-human-rights/ |
| Conflict minerals | According to US Dodd Frank Act, article 1502 |
| UK Modern Slavery Act | According to https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted |
| Transparency Act 2021-06-18-99 | According to https://lovdata.no/dokument/NL/lov/2021-06-18-99 |

3. Governance and implementation

3.1 Roles and responsibilities

| Role | Responsibilities |
|--|--|
| President and CEO | <ul style="list-style-type: none"> Responsible for the guideline Adopts the governing document |
| Senior Vice President, Environment and Sustainability | Responsibility delegated from Group management, which includes: <ul style="list-style-type: none"> Procedure management Monitoring of compliance Audit |
| Business area managers / chiefs of staff and the Presidents of companies | <ul style="list-style-type: none"> Responsible for compliance Responsible for ensuring that relevant operational positions are familiar with and comply with the guideline |

3.2 Implementation

Human rights are included in employee training.

Due diligence shall be carried out to identify, prevent, limit and report on LKAB's impact on human rights. Business area managers /chiefs of staff are responsible for identifying the impact on human rights annually, in connection with any new projects and for acting based on the results and in compliance with this guideline.

Risks linked to human rights are managed according to risk management policy and identified risks are recorded in LKAB's risk and deviation management system.

Identified risks and impacts are reported through the sustainability reporting system.

Guideline compliance is monitored through supplier sustainability audits and internal audits of the operations.

3.3 Publication

The governing document must be published internally on the Group-wide pages in the business system and on LKAB's external website.

Every year, the Board issues a statement on modern slavery under Section 54 of the UK Modern Slavery Act, which explains how we make sure modern slavery and human trafficking do not occur in our business or supply chain, and what measures have been taken and planned. Additionally, the Norwegian Transparency Act 2021-06-18-99 (Transparency act – the Act on business transparency and work with fundamental human rights and decent working conditions) requires companies pursuing business operations in Norway to publish a statement describing the measures taken to promote the company's respect for fundamental human rights and decent working conditions in its own business operations and supply chain. Publication takes place on LKAB's external website in the annual and sustainability report and in accordance with instructions from the UK Home Office and Norwegian legislation.

4. Work with human rights

There is a special focus in the following areas based on risk analyses carried out with the businesses and the materiality analysis process.

- Community impact
- Operations and production in risk categories
- Working conditions and safety in our own operations and the supply chain
- Indigenous people
- Diversity and discrimination

The work must also include making sure that processes are in place to prevent modern slavery and human trafficking in our business and supply chain.

No material containing conflict minerals that directly or indirectly favour the armed groups that contribute to significant human rights violations, e.g. in the Democratic Republic of Congo and neighbouring countries may be purchased. We are also actively engaged in close collaboration with customers, suppliers and other stakeholders on best practices and viable solutions for the continued development of a responsible value chain.

No material that contributes to violations of human rights may be procured and we expect the same approach from our suppliers in accordance with our Supplier Code of Conduct.

Ongoing dialogues with stakeholders

Our work with human rights must be characterised by clarity, transparency and dialogue. Particular attention is paid to dialogues with stakeholders who risk being adversely affected, such as Sami communities, local communities and those affected by our use of land. The aim is to understand our impact on human rights and be aware of risks involved in order to take action.

Measures

Action is taken in cases where LKAB identifies a negative impact on human rights, or where there is a clear and present risk. The principle is to remediate the violated group or individual through cooperation and consensus. Relevant incidents, actions and follow-up of human rights work must be reported in the annual sustainability report.

Where necessary, external expertise is consulted to ensure accurate, objective assessments.

5. Guideline contraventions

Contraventions of this Group guideline may, in addition to legal sanctions, lead to consequences under labour law for the individual.

5.1 Reporting guideline contraventions

Contravention of this Group guideline may be reported through the line organisation or to HR, the document manager or other appropriate business function.

In the case of wrongdoing, reports must always be submitted through SpeakUp, LKAB's whistleblower system. A link to SpeakUp and a guide to what must be reported in the system is described in the Arena Management system, the intranet and LKAB's external website.

6. Annual review

This guideline must be reviewed on an ongoing basis, at least annually, to make sure it is up to date. Reviewers shall make sure the guideline is relevant to the operation, has the intended effect and is complied with in the Group.

Amendments that affect the purpose of the governing document, its stated framework or which otherwise affect LKAB must gain the approval of the adopting party. Amendments of this type shall be documented in the version log; adopted documents will receive a new version number (version X).

Editorial changes – including corrected spelling errors, updates of related governing documents etc. – that do not affect the purpose and content of the procedure may be made with the approval of the document manager. Amendments must be recorded in the version log and the document given a new version number (version X.Y).

This document is based on, monitored and revised using the following references, among others:

- The Universal Declaration of Human Rights (UDHR)
- International Covenant on Civil and Political Rights (ICCPR)
- International Covenant on Economic, Social and Cultural Rights (ICESCR)
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights (UNGPR)
- UN Global Compact
- Convention on the Rights of the Child
- Children's Rights and Business Principles

- The Swedish Government Action Plan on Entrepreneurship and Human Rights
- OECD due diligence guidance on responsible CSR
- Swedish Mineral Strategy
- GRI Standards and GRI G4 Mining and Metals Sector Supplement
- International Council on Mining & Metals Sustainable Development Framework (ICMM)

7. Further guidance

For guidance regarding the interpretation, use or similar in respect of this governing document, contact LKAB's Environmental and Sustainability unit.