



CODE OF CONDUCT FOR SUPPLIERS

Version 1, revised 10 September 2020

Adopted by the Board of Directors of Samhällsbyggnadsbolaget i Norden AB (SBB) on 7 September 2020

Introduction

The purpose of this Code of Conduct for Suppliers is to define a business ethics compass for Samhällsbyggnadsbolaget i Norden AB (SBB) as a business partner, employer, employee and community actor with the aim of maintaining a high level of trust in SBB among customers, business partners, employees, shareholders and the market.

All employees, including all managers, are responsible for keeping themselves informed on both the Code of Conduct and other applicable policies within the company, as well as regarding applicable legislation. SBB is reliant on the trust of its tenants, its tenants' customers, its employees, its shareholders, and its partners. It is only by maintaining a high level of trust that SBB can continue to be a successful and long-term player in social infrastructure. SBB's Code of Conduct defines a business ethics compass for SBB – the Code sets out clear standards as to how we are expected to behave as business partners, employers, employees, and societal stakeholders.

To whom does the Code of Conduct apply

The Code of Conduct applies to all of SBB's suppliers and business partners, including contractors, consultants and other business partners working within SBB's operations. SBB's Code of Conduct also applies to joint ventures and other operations in which SBB has a holding.

SBB expects its suppliers to be familiar with the contents of the Code of Conduct and to consider how it can apply to their tasks. It is the responsibility of all to lead by example.

Working environment and professional behaviour

SBB's suppliers are expected to perform their duties in a professional, responsible, respectful, conscientious, and ethical manner, and to act in the best interests of the company. This applies to contacts with SBB's customers, employees, partners, and other stakeholders. SBB's equipment and property are to be treated with due care and judgement and are to be used only for their intended purposes.

SBB complies with applicable laws, agreements, and regulations regarding working hours.

No one may be under the influence of alcohol or drugs in connection with work being carried out under the auspices of SBB. SBB does not accept any form of disrespectful behaviour, bullying, discrimi-



nation, isolation, harassment or molestation in the form of, for example, sexual advances. Harassment is intended to denote undesirable behaviour that violates the dignity or integrity of an individual.

SBB does not tolerate any form of forced labour.

SBB supports the abolition of exploitative child labour. In the event of any recruitment of employees below the age of 18 (which may occur under exceptional circumstances, mainly during vacation periods or in the form of internships and the like), the company complies with applicable working environment regulations with regard to the employee's age, including the observance of working hours and level of responsibility, etc.

Laws, rules, and regulations

SBB adheres to the legislation, rules, and regulations relevant to its operations. SBB requires its business partners to act in a similar manner.

SBB also supports international standards in human rights, working conditions, the environment and anti-corruption. SBB has been a member of the UN Global Compact since 2016. Accordingly, the SBB supports the Global Compact and undertakes to apply its ten principles of human rights, labour law, the environment and anti-corruption based, which are based on the UN Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against Corruption.

Environmental impact

SBB has undertaken to mitigate any negative effects on the environment that the company's operations may cause. SBB always strives to use energy-efficient equipment and processes in the company's operations. The company's suppliers must report any discrepancies detected that impact the environment at the properties managed by SBB.

SBB always encourages the company's partners and subcontractors to comply with environmentally friendly procedures.

Business ethics, anti-corruption measures, anti-competitive behaviour, and money laundering

SBB follows current regulations on combating money laundering and expects the same from its suppliers and business partners.

SBB applies zero tolerance of bribery and behaviours aimed at generating business advantages through the provision of gifts, entertainment, or benefits. Any attempt to bribe anyone should be reported to the nearest manager or to company management.



Gifts, entertainment, remuneration and personal benefits may only be offered or received if they are of low value and in accordance with normal business practices. No gifts, entertainment or personal services may be offered that violate any applicable law or Code of Conduct. Nor may SBB employees or suppliers receive any gift, entertainment or personal service that may be believed to have an impact on business transactions.

SBB's employees and suppliers shall not participate in any collaboration or behave in any other manner that could be perceived as restricting competition.

SBB's employees and suppliers are aware that the information, working documents and systems provided by SBB, or which are developed based on information provided by SBB, and which are not public, must be treated as confidential. SBB's employees and suppliers show caution in handling the company's documents and information.

Alcohol and drugs

All employees and suppliers must be sober and drug-free during working hours.

Reporting suspected abuse

If a violation of the Code is detected, the violation will result in an investigation that may lead to disciplinary action such as a warning, termination, dismissal or even prosecution. Employees or suppliers who detect violations of the Code of Conduct should report the violation to their nearest manager or to a senior manager as soon as possible. Violations can also be reported anonymously to the person designated by SBB in the company's whistleblower policy.

Compliance

The principles of the Code of Conduct are reviewed on an ongoing basis as a natural part of the company's operations.

If an SBB employee or supplier fails to act in accordance with the Code of Conduct, appropriate measures will be taken. If a business partner repeatedly or seriously violates the Code of Conduct, the company's collaboration with that business partner will be terminated.