

# Supplier Code of Conduct

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# 1. Background and purpose

To ensure that Samhällsbyggnadsbolaget i Norden AB (publ) ("**SBB**") (including subsidiaries) complies with applicable laws and regulations as well as the company's values, SBB has developed a number of Group-wide governing documents, including this policy.

## 1.1. Background

SBB owns long-term attractive rental apartments in growth regions in Sweden, which are managed and developed with a focus on tenants' well-being, local community involvement and strong sustainability work.

## 1.2 Purpose

SBB has developed a Code of Conduct that includes and must be signed by all suppliers. The supplier has the ultimate responsibility for ensuring compliance with this policy.

The Code of Conduct is based on SBB's values and vision. The purpose of the Code of Conduct is to ensure that SBB's suppliers are not involved in corruption, bribery, or other illegal activities that risk the trust that SBB has established. It is of the utmost importance that the supplier competes on equal terms in order to promote a healthy and effective competition and a sustainable market.

The cooperation between SBB and its suppliers shall be based on independent and mutual trust. Goods, services and contracts must be produced and executed in accordance with applicable legislation. This Code of Conduct applies to the entire supply chain.

## 1.3 Values and vision

### 1.3.1 Values

Reliability, Development and Long-Term Perspective

SBB should be a natural and **reliable** partner to the public sector by owning, managing and **developing** community service properties in the Nordic region in the long term.

As a community builder and **long-term** partner to municipalities, regions and government agencies, conduct an active work with the purpose of creating development rights for social infrastructure.

### 1.3.2 Vision

SBB's vision is to be the Nordic region's leading real estate company in social infrastructure.

## 2. Target group

The policy shall be applied by all wholly-owned legal entities within the SBB Group and in all collaborations with suppliers.

## **3. Supplier requirements**

### **3.1 Human rights**

#### **3.1.1 Equality, discrimination and inclusion**

The supplier undertakes to actively work against discrimination and ensure equal treatment. Furthermore, the supplier is obliged to actively promote equality and diversity in its own organisation and in relation to its customers and partners. The supplier shall counteract and not tolerate discrimination, threats and harassment on the basis of gender, age, gender identity, ethnic or religious affiliation, belief or sexual orientation in the workplace.

#### **3.1.2 Community engagement and social development**

The supplier should engage in community activities in an inclusive, fair, gender-sensitive and culturally appropriate way, while respecting human rights. SBB encourages the supplier to get involved and contribute to the development of society in a way that is in line with the supplier's business.

#### **3.1.3 Freedom of opinion and expression and the right to privacy**

The Supplier undertakes to respect the employees' freedom of opinion and expression and shall not violate the employee by disclosing personal information. When collecting, processing or storing personal data of employees or other individuals, the Supplier undertakes to respect the individual's right to privacy and to comply with applicable data protection legislation.

#### **3.1.4 Child labour**

The supplier undertakes to have a clear policy to fight child labour and not to engage in or benefit from any form of child labour. This commitment follows the principles outlined in the *“Children's Rights and Business Principles”*.

The supplier shall take responsibility for ensuring that no one who has not reached the minimum age for employment under applicable law is employed. The minimum age is defined as the age at which a child has completed primary school, which is usually 15 years old. Minors may only work in safe conditions with harmless tasks in accordance with current legislation.

If the supplier discovers that child labour is present in the business, they must be responsible for taking action based on the best interests of the child. This may entail that the child receives adequate support and that the situation is addressed in a way that ensures the child's well-being and rights.

#### **3.1.5 Working under duress**

The supplier undertakes to ensure that work under duress, threats or harassment never occurs. All work performed must be on a voluntary basis where the employee must have the right to terminate their employment with a reasonable period of notice. This includes that the supplier must not take advantage of involuntary prison labour, slave-like labour, involuntary labour or work under threat of punishment. The supplier may not withhold identity documents, work permits or wages in order to impose employment.

## **3.2 Labour rights**

### **3.2.1 Working conditions**

The supplier undertakes to promote and respect human rights in accordance with the UN Declaration. This applies just as well within the company's own operations as in the supply chain.

### **3.2.2 Salaries and terms of employment**

The Supplier undertakes to comply with the statutory limits on minimum wages, working hours and overtime work set out in the ILO Conventions, national legislation, or as agreed in a written agreement between the workers' organisation and the employers' organisation. Salary must always be paid regularly, on the agreed date and in full.

### **3.2.3 Work environment and safety**

The supplier undertakes to provide a safe and healthy working environment for the employee and to comply with applicable health and safety laws and regulations. Employees must be informed of any health risks that the work may entail and have access to and use adequate safety equipment at work and are covered by accident insurance. It is prohibited to work under the influence of alcohol or drugs, and the supplier must actively engage in preventive measures.

Written safety instructions must be available to employees. In addition, the supplier must document and report all incidents in accordance with national practice. Active work must be in place to minimise accidents and work-related injuries.

The supplier is responsible for ensuring that the emergency exits at the workplace are clearly marked and properly lit, and that they are not blocked.

### **3.2.4 Freedom of association**

The supplier undertakes to procure that employees have the right to trade union engagement and freedom of association, as well as to collectively negotiate wages, benefits and other working conditions.

### **3.2.5 Workplace conditions**

The supplier undertakes to provide at least free access to drinking water and toilets for employees and for visitors to use when needed. Employees must also have the right to breaks that are reasonable in relation to their work and shorter breaks. The supplier must ensure that the work spaces are clean, well-lit and that they are adapted to the work to be performed.

## **3.3 Environment and climate**

### **3.3.1 Environmental impact**

The supplier undertakes to conduct its business with the least possible impact on the environment and employees are provided with sufficient knowledge and skills to be able to perform their respective tasks environmentally, safely and sustainably. The sustainable use of materials, energy and other resources shall be sought. Harmful substances and waste must be handled responsibly and in accordance with laws, regulations and local guidelines. Employees must work to minimise emissions, make land, material and energy use more efficient, and primarily choose sustainable materials and working methods.

The supplier shall strive to develop and disseminate environmentally friendly technology when appropriate and in other ways conduct proactive environmental work, for example to improve the efficiency of energy and the use of resources.

### **3.3.2 Precautionary principle**

The supplier undertakes to always apply the precautionary principle with regard to the environment and environmental risks with the aim of reducing the impact of its operations on the environment. If there is uncertainty about the environmental impact of the use of substances, materials or processes, the supplier must refrain from use if possible.

### **3.3.3 Environmental legislation and management**

The supplier must hold the necessary environmental permits and licences for the operations and comply with the requirements and reporting obligations that these entail. If the supplier's operations have a negative climate impact, they must have procedures in place to systematically take environmental aspects into account. This includes having a management system that includes action plans to improve the supplier's environmental performance by setting goals and conducting follow-ups. In addition, suppliers must educate, inform and create awareness among employees.

### **3.3.4 Waste management and transport**

The supplier undertakes to manage and recycle waste in the most environmentally friendly and traceable way possible. The aim should be to reduce the environmental impact of transport by prioritising fuel-efficient and low-emission vehicles for transport and logistics, whenever possible.

## **3.4 Business ethics**

All suppliers are expected to comply with applicable laws and regulations governing their operations, including environmental laws, competition rules, labour laws, tax laws, safety requirements and other applicable laws and regulations.

### **3.4.1 Bribery and corruption**

The supplier undertakes to strive for high business ethics and integrity at all levels of the organization.

No form of bribery, fraud, money laundering or corruption is allowed. The Supplier's employees are expected to be strictly professional and therefore never offer, receive, promise or accept a promise of improper gifts in the form of cash, products, goods, services, leisure trips or any other form of entertainment. A benefit or advantage offered to employees by an external person is typically improper if it affects or risks affecting the employee's objectivity and ability to make a commercially sound decision. Gifts, entertainment, compensation and personal benefits may be offered to a third party only if they are of little value and in accordance with customary business practice.

### **3.4.2 Fair competition**

The supplier is committed to building its business on sound business culture and fair competition. The commitment means that we always comply with applicable competition law, which prohibits agreements and arrangement that hinder competition. This also includes avoiding price fixation, sharing of customers or geographic markets, cartels and abuse of a dominant position.

### **3.4.3 Protection of rights and information**

The supplier must respect SBB's intellectual property rights and protect the company's information. They may only use or disclose information and data that is necessary for the assignment in accordance with the agreement and applicable law.

#### **3.4.4 Trademark**

The Supplier undertakes not to use SBB's name, trademark or other distinguishing marks without prior written approval.

### **4. Roles and responsibilities**

SBB's CEO is the owner of this policy.

### **5. Exemption**

There are no exceptions to this policy. If exceptions to this policy are made, these must be defined and documented. All exemptions must be presented and approved by SBB's Board of Directors.

### **6. Proof of compliance**

The Code of Conduct is approved by the Board of Directors. The CEO of SBB is responsible for monitoring compliance with the Code of Conduct in ways deemed appropriate for the purpose. The CEO should report annually to the Board of Directors on compliance with the Code of Conduct and the measures taken during the year to ensure awareness of and compliance with it.

### **7. Associated documents**

- SBBs Code of Conduct (employees)