

Dokumenttyp: Policy
Ägare: VD för
Samhällsbyggnadsbolaget i Norden AB

Antagen av: Styrelsen
Datum för antagande: 2026-04-
23

Version: 1
Giltig från: 2026-04-23

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 and manages attractive community properties in the Nordics with a long-term perspective, focusing on tenant well-being, local community engagement, and strong sustainability efforts.

○ 1.2 Purpose

SBB has developed a code of conduct that covers and must be signed by all suppliers. The supplier bears ultimate responsibility for ensuring compliance with this code.

The Code of Conduct is based on SBB’s core values and vision. Its purpose is to ensure that SBB’s suppliers are not involved in corruption, bribery, or other illegal activities that could jeopardize the trust SBB has built. It is of utmost importance that suppliers compete on equal terms in order to promote healthy and effective competition and a sustainable market.

Cooperation between SBB and its suppliers must be based on independence and mutual trust. Goods, services, and contracts must be produced and performed in accordance with applicable legislation. This Code of Conduct applies throughout the entire supply chain.

○ 1.3 Core Values and Vision

■ 1.3.1 Core Values

Reliability, Development and Long-Term Perspective

We shall be a natural and **reliable** partner to the public sector by owning, managing, and **developing** community properties in the Nordics with a long-term perspective.

As a community builder and **long-term** partner to municipalities, regions, and government authorities, we conduct active work aimed at creating development rights for social infrastructure.

■ 1.3.2 Vision

SBB’s vision is to be the leading real estate company in the Nordics within social infrastructure.

○ 2. Target Group

This 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, Non-Discrimination and Inclusion

The supplier undertakes to actively work against discrimination and ensure equal treatment. Furthermore, the supplier is required to actively promote equality and diversity within its own organization and in relation to its customers and business partners. The supplier shall combat and not

tolerate discrimination, threats, and harassment in the workplace on the grounds of gender, age, gender identity, ethnic or religious affiliation, belief, or sexual orientation.

■ 3.1.2 Community Engagement and Social Development

The supplier should engage with society in an inclusive, fair, gender-aware, and culturally adapted manner, while respecting human rights. SBB encourages the supplier to engage in and contribute to social development in a way that aligns with the supplier's operations.

■ 3.1.3 Freedom of Opinion and Expression and the Right to Privacy

The supplier undertakes to respect employees' freedom of opinion and expression and shall not violate employees 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 comply with applicable data protection legislation.

■ 3.1.4 Child Labour

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

The supplier shall take responsibility for ensuring that no one is employed who has not reached the minimum age for employment under applicable legislation. The minimum age is defined as the age at which a child has completed compulsory schooling, which is usually 15 years. Minors may work only under safe conditions and with non-hazardous tasks in accordance with applicable legislation.

If the supplier discovers that child labour occurs in its operations, it shall be responsible for taking measures based on the best interests of the child. This may involve ensuring that the child receives adequate support and that the situation is remedied in a way that safeguards the child's well-being and rights.

■ 3.1.5 Forced Labour

The supplier undertakes to ensure that forced labour, threats, or harassment never occur. All work performed shall be voluntary, and employees shall have the right to terminate their employment with reasonable notice. This includes that the supplier may not benefit from involuntary prison labour, slave-like labour, involuntary work, or work under threat of punishment. The supplier may not withhold identity documents, work permits, or wages in order to compel employment.

○ 3.2 Labour Rights

■ 3.2.1 Working Conditions

The supplier undertakes to work to respect human rights in accordance with the UN Declaration. This applies equally within its own operations and throughout the supply chain.

■ 3.2.2 Wages and Employment Terms

The supplier undertakes to comply with the statutory limits for minimum wage, working hours, and overtime as set out in ILO conventions, national legislation (where applicable), or as agreed in a written agreement between a workers' organization and an employers' organization. Wages shall always be paid regularly, on the agreed date, and in full.

■ 3.2.3 Work Environment and Safety

The supplier undertakes to provide employees with a safe and healthy work environment and to comply with applicable occupational health and safety laws and regulations. Employees shall be informed of any health risks the work may entail and have access to and use adequate safety equipment in their work, as well as be covered by accident insurance. It shall be prohibited to work under the influence of alcohol or drugs, and the supplier shall actively work preventively.

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

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

■ 3.2.4 Freedom of Association

The supplier undertakes to ensure that employees have the right to union engagement and freedom of association, as well as the right to collectively negotiate wages, benefits, and other terms of employment.

■ 3.2.5 Workplace Conditions

At a minimum, the supplier undertakes to provide free access to drinking water and toilets for employees and visitors to use as needed. Employees shall also be entitled to breaks that are reasonable in relation to the work, as well as shorter interruptions. The supplier shall ensure that workspaces are clean, well lit, and adapted to the tasks to be performed.

○ 3.3 Environment and Climate

■ 3.3.1 Environmental Impact

The supplier undertakes to conduct its operations with the least possible impact on the environment, and employees shall be provided with sufficient knowledge and competence to perform their respective tasks in an environmentally sound, safe, and sustainable manner. Sustainable use of materials, energy, and other resources shall be pursued. Harmful substances and waste shall be handled responsibly and in accordance with laws, regulations, and local instructions. Employees shall work to minimize emissions, improve the efficiency of land, material, and energy use, and primarily choose sustainable materials and working methods.

The supplier shall strive to develop and disseminate environmentally friendly technology where appropriate and otherwise conduct proactive environmental work, for example to improve the efficiency of energy and resource use.

■ 3.3.2 Precautionary Principle

The supplier undertakes always to apply the precautionary principle regarding the environment and environmental risks, with the goal of reducing the environmental impact of its operations. If there is uncertainty about the environmental impact of the use of substances, materials, or processes, the supplier shall refrain from using them where possible.

■ 3.3.3 Environmental Legislation and Environmental Management

The supplier shall hold the necessary environmental permits and licenses for its operations and comply with the requirements and reporting obligations they entail. If the supplier's operations have a negative climate impact, it must have routines to systematically take environmental aspects into account. This includes having a management system containing action plans to improve the supplier's

environmental work by setting targets and carrying out follow-ups. In addition, suppliers shall educate, inform, and raise awareness among employees.

■ 3.3.4 Waste Management and Transport

The supplier undertakes to handle and recycle waste in the most environmentally friendly and traceable way possible. Efforts shall be made to reduce the environmental impact of transport by prioritizing fuel-efficient vehicles with low emissions for transport and logistics whenever possible.

○ 3.4 Business Ethics

All suppliers are expected to comply with applicable laws and regulations governing the business, including environmental legislation, competition rules, labour law, tax legislation, 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, improper payments, fraud, money laundering, or corruption is permitted. The supplier's employees are expected to act with strict professionalism and must therefore never offer, receive, promise, or accept a promise of inappropriate gifts in the form of cash, products, goods, services, entertainment 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 nominal value and in accordance with customary business practice.

■ 3.4.2 Fair Competition

The supplier undertakes to build its business on a sound business culture and fair competition. This commitment means always complying with applicable competition law, which prohibits agreements and arrangements that restrict competition. This also includes avoiding price-fixing, division 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 forward information and data that are necessary for the assignment in accordance with the agreement and applicable legislation.

■ 3.4.4 Trademark

The supplier undertakes not to use SBB's name, trademark, or other distinguishing marks unless this has been approved in writing.

1. Roller och ansvar

SBB:s VD är ägare av denna policy.

2. Undantag

Det finns inga undantag till denna policy. Om undantag från denna policy görs, ska dessa definieras och dokumenteras. Alla undantag ska presenteras och godkännas av SBB:s styrelse.

3. Bevis på efterlevnad

Uppförandekoden godkänns av styrelsen. VD:n för SBB är ansvarig för att övervaka efterlevnaden av uppförandekoden på sätt som anses lämpliga för ändamålet. Årligen bör VD:n rapportera till styrelsen om efterlevnaden av uppförandekoden samt de åtgärder som har vidtagits under året för att säkerställa kännedom om och efterlevnad av den.

4. Associerade dokument

- SBB:s uppförandekod (medarbetare)