

Code of Conduct for Business  
Partners & Suppliers

The logo for Stendörren is a dark blue rectangular block. It features the word "STENDÖRREN" in white, uppercase, sans-serif font, centered within the block. The text is flanked by two thin white horizontal lines, one above and one below the letters.

STENDÖRREN

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# Code of Conduct for Business Partners and Suppliers

## Introduction

Stendörren Fastigheter strives to contribute to a positive development of our common society by taking long-term responsibility for the environment, climate, social, ethical and economic issues in its operations. This is reflected in all our relationships with different stakeholders. We want to create value – we do this best based on mutual understanding, transparency and dialogue with employees, customers, suppliers, partners, and the communities in which we operate.

An important part of the relationship with all stakeholders is that we comply with laws, regulations and relevant international regulations though compliance with requirements is just the foundation. We are aware of the impact we have on our surroundings and therefore place high ethical and business demands on ourselves to reduce negative impact and instead increase our positive impact. We are proud of what we do and are keen to ensure that care and value creation permeate all our relationships.

This Code of Conduct applies to all Business Partners (here after referred to as the "**Code of Conduct**") who supply goods and services to the Company. The Code of Conduct has been adopted on the basis that all actors who are part of Stendörren Fastigheter's operations shall strive for the same high standards of business ethics. The purpose of the Code of Conduct is to provide guidance on how customers, suppliers, consultants and other partners (collectively, "**Business Partners**") should conduct business with Stendörren Fastigheter. We are constantly working to improve our own business and expect our Business Partners to apply the same principles throughout their value chain. By signing this document, Business Partners undertakes to comply with all requirements set out in the Code of Conduct.

The Code of Conduct cannot cover all situations but provides standards and principles for how we expect our Business Partners to act. Business Partners shall apply these standards and principles with integrity and responsibility. Unless specific situations are expressly covered, the spirit of this Code of Conduct shall be upheld through the use of common sense and good judgment, always in accordance with applicable law.

Stendörren Fastigheter works with an open dialogue to clarify uncertainties and to identify areas for improvement. Compliance with the Code of Conduct is evaluated in the dialogue between the parties to the extent necessary, which is expected to gradually increase in the coming years. Stendörren continuously monitors compliance with the agreement through checks, announced and unannounced, with regard to compliance with this Code.

## Basic principles

### Legislation and local practices

Business Partners shall comply with all applicable laws and regulations of the country in which the company operates. If there is a conflict between more restrictive laws and the principles and values of the Code of Conduct, the law must be followed. In cases where there is a conflict between local customs and the principles and values of the Code of Conduct, the Code of Conduct shall govern the actions of Business Partners. Business Partners are also expected to work together with their own Business Partners to achieve these goals.

### International codes and conventions

The Code of Conduct is based on the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Stendörren Fastigheter expects its Business Partners to respect all internationally recognized human rights, based on the United Nations Universal Declaration of Human Rights. Stendörren Fastigheter integrates the UN's Paris Agreement for the climate and the global sustainability goals into its own operations.

Stendörren Fastigheter expects Business Partners to follow the same ethical standards as Stendörren Fastigheter and to work to reduce negative social and environmental aspects arising from its own operations.

## Work environment and social sustainability

Business Partners shall comply with applicable laws, agreements, and regulations regarding working hours. Business Partners are expected to provide safe and healthy working conditions through systematic work environment management in accordance with the Swedish Work Environment Authority's guidelines, including the regulations regarding the organizational and social work environment. Accidents and occupational injuries must be prevented. All employees, regardless of their employment or contract status, must be covered by accident insurance. Furthermore, Business Partners shall not accept any form of bullying such as isolation, harassment, verbal or physical abuse.

Stendörren Fastigheter prioritizes Business Partners with systematic work environment management certified by a third party.

### Health and safety

Stendörren Fastigheter expects Business Partners to comply with all laws and regulations regarding fair, safe and healthy employment conditions, and strives to continuously improve health and safety performance.

Business Partners shall obtain all necessary environmental and safety related permits and licenses and their operational requirements, restrictions and reporting requirements shall be complied with by Business Partners.

### Human rights

In their operations, Business Partners shall take into account and respect the human rights internationally declared by the UN. Business Partners should avoid violating the human rights of others and address adverse impacts on the human rights in which they are involved.

### Equal opportunities

All employees at “Business Partners” shall be treated with respect and dignity. Any discrimination based on bias or prejudice is prohibited and Business Partners must ensure that these do not occur in their business. Business associates shall be recruited and promoted solely based on qualifications for the job, regardless of race, color, sex, sexual orientation, gender identity, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, domestic status, disability, collective membership or employee representation and other protected by applicable law.

Employees of Business Partners with the same qualifications, experience and performance shall receive equal pay for equal work with respect for those who perform the same work under similar working conditions.

### Zero tolerance for forced labour

No form of forced labour is accepted. Modern slavery, including forced labor and human trafficking, is strictly prohibited. Business Partners' employees shall be free to leave their employment after a reasonable period of time in accordance with applicable law or agreement. It is forbidden to require employees to submit deposits in the form of money or identification documents to Business Partners.

### Zero tolerance for child labour

Business Partners must counteract all forms of child labour. Business Partners support the elimination of exploitative child labour and comply with the applicable health and safety regulations, considering the age of the worker. The minimum age is always 15 years old or the applicable higher legal minimum age. Young people between the ages of 15 and 18 may work in non-hazardous tasks, provided that they have reached the legal age to work and have completed national obligatory schooling or that the work allows for the parallel implementation of obligatory schooling. Business Partners should not be involved in or benefit from any form of child labor.

### Trade union freedom and secure conditions

Business Partners shall respect the rights of employees, as set out in local laws, regarding freedom of association and free membership of trade unions and thereby seek representation. This means, among other things, that employees of Business Partners shall have free access to form or join, or not to join, trade unions or similar external representative organizations and to negotiate collectively.

### Financial compensation

All employees must have written employment contracts translated into a language they fully understand, which are provided to the employee prior to commencement of employment. Salaries at Business Partners shall comply with local legislation, including minimum wages, overtime pay, sick and parental leave and statutory benefits.

## Employers

### Professional behavior

Business Partners' employees are expected to act professionally, responsibly, carefully, and ethically. Stendörren Fastigheter's premises, equipment and property must be treated judiciously and with due care, and only be used for the purposes for which they are intended.

## Environment

Business Partners shall take active steps to reduce negative environmental impact and seek ways to contribute to positive environmental impact. Stendörren Fastigheter expects Business Partners to be committed to continuous improvements in the management of their environmental impact and to prioritize developing a sustainable business. We prioritize Business Partners with systematic environmental work certified by a third party.

### Carbon footprint

Business Partners and suppliers must have control and procedures in place to identify, measure and follow up their climate impact and systematically work to continuously improve their climate performance. Business Partners and suppliers shall strive to reduce the climate impact of products and services seen from a life cycle perspective and impose environmental and climate requirements on their contracted subcontractors. Stendörren prioritizes Business Partners who measure and can provide reliable climate data for purchased products and construction establishment.

### Resource and waste management

Business Partners and suppliers shall work to reduce their emissions to air, land and water through a correct and responsible manner of measuring, reporting and managing the business's resources. Business Partners and suppliers are expected to work with reuse and gradually increase its share. A proper and responsible recycling and waste management system shall be applied and promoted. All waste, especially hazardous waste, should be handled responsibly and in line with local regulations. Suppliers shall ensure that the necessary data and certificates are available to meet relevant requirements for the use of products and materials in Stendörren's projects, properties, and premises.

### Choice of materials

Business Partners and suppliers shall systematically take the environment and climate impact into account when choosing materials in new construction, renovation, and new construction, and minimize the use of harmful and toxic substances.

## Transparency and business ethics

The suppliers' operations shall be characterized by high business ethics, good business practice, a sense of responsibility and impartiality.

### Competition

Business Partners shall conduct their business in accordance with applicable competition law, including rules against anti-competitive behaviour. Business Partners shall not engage in discussions or agreements with competitors regarding pricing, market sharing or similar activities.

### Anti-corruption and bribery

Business Partners shall work actively with anti-corruption in their operations and comply with relevant laws and regulations regarding anti-

corruption. Further, Business Partners may not engage in or tolerate any form of corruption, bribery, extortion, fraud, embezzlement, or similar conduct.

Business Partners are not allowed to offer or receive any kind of benefits or gifts that typically can influence decision-making. Such benefits may include, for example, cash, other forms of gifts, leisure or holiday travel, or other benefits of service or well-being.

Business Partners should commit to complying with the Swedish Anti-Bribery Code on Gifts, Rewards and Other Benefits in Business "Näringslivskoden".

#### Conflicts of interest

Business Partners shall not engage employees from Stendörren Fastigheter in ways that may create conflicts of interest. Business Partners shall avoid conflicts of interest that could jeopardize the Business Partner's credibility or other third party's confidence in Stendörren Fastigheter.

#### Money laundering

Business Partners must comply with applicable regulations regarding anti-money laundering. This means, among other things, that suppliers must always have a good knowledge of the counterparties they do business with.

#### Taxes

Business Partners shall respect all applicable tax rules and laws, ensure that relevant tax obligations are met (both applicable documentation and deadlines), and fully pay all local and national taxes in accordance with applicable rules and laws.

## Responsibilities of Business Partners

#### Resource

Business Partners are encouraged to comply with the requirements of this Code of Conduct by allocating sufficient resources through internal training, business development and management engagement.

#### Compliance

Business Partners are expected to monitor and follow up on their own compliance with this Code of Conduct.

#### Continuous improvement

Stendörren Fastigheter realizes that Business Partners will be at different stages regarding the various issues addressed in the Code of Conduct and undertakes to work with Business Partners to achieve continuous improvement.

If Stendörren Fastigheter finds that a Business Partner does not comply with the requirements and expectations set out in the Code of Conduct, Stendörren Fastigheter will work together with Business Partners and provide guidance on which problem areas need to be addressed and corrected. Business Partners must then take corrective action and commit to making progress. In the event that Stendörren discovers that the Business Partner does not fulfil its commitment despite repeated reminders, it may constitute grounds for Stendörren to terminate the cooperation.

#### Consequences of non-compliance

Stendörren Fastigheter expects Business Partners to run their businesses in ways that are consistent with the Code of Conduct. Action will be taken against Business Partners who continue to violate applicable laws, who do not comply with the Code of Conduct or who repeatedly and without justification refuse to provide information regarding situations covered by the Code of Conduct. Stendörren Fastigheter reserves the right to take action and to terminate collaborations with Business Partners that violate the Code of Conduct.

#### Auditing

Stendörren Fastigheter shall have the right to conduct regular audits and to systematically evaluate and reduce risks and impacts regarding human rights, labour law, the environment, bribery and business ethics in Business Partner's operations.

Stendörren Fastigheter or a third party authorized by Stendörren Fastigheter and which may be considered acceptable to the Business Partner, reserves the right, at its own expense, to carry out announced and unannounced inspections of the Business Partner's operations in order to review the Business Partner's compliance with the Code of Conduct. This includes, but is not limited to, a right to inspect the business's facilities as well as to review relevant documentation and conduct interviews with staff and management. At the request of the Business Partner, the parties involved in the audit shall enter into a confidentiality agreement regarding the findings of the audit.

#### Reporting

Business Partners shall report all knowledge of any violations of applicable laws, the Code of Conduct or similar standards to Stendörren Fastigheter and take appropriate action.

Stendörren Fastigheter has a whistleblower function that can also be accessed by external parties. At [Visselblåsare – Stendörren \(stendorren.se\)](#) external partners, where the nature of the issue so requires, can make use of the.

## Further

#### Contact

Stendörren Fastigheter encourages Business Partners to get in touch with questions, suggestions, doubts and ideas regarding the Code of Conduct. To contact Stendörren Fastigheter regarding the Code of Conduct, please contact:

Telefon: 08-518 331 00

Mail: [info@stendorren.se](mailto:info@stendorren.se)

Web: [www.stendorren.se](http://www.stendorren.se)

#### Timeliness and revision

The Code of Conduct is subject to review as necessary and was approved for the first time by the CEO of the company on April 2, 2019.

[Revision 2023](#)

The Code of Conduct was reviewed in the spring of 2024 and some adjustments, additions and clarifications to the Code of Conduct have been made. On April 12, 2024, the company's CEO adopted the Code of Conduct.

**Business Partner signature**

Date: \_\_\_\_\_

Place: \_\_\_\_\_

\_\_\_\_\_  
Company

\_\_\_\_\_  
Authorized signatory

\_\_\_\_\_  
Name in block letters