

# Ethical guidelines at Wihlborgs

**Wihlborgs' ethical guidelines summarise positions on important issues to provide guidance for employees on Wihlborgs' long-term sustainable and responsible approach to conducting its operations.**

The code of conduct is based on the ten principles of the UN Global Compact concerning human rights, labour, the environment and anti-corruption as well as Wihlborgs' core values: Action, Honesty, Knowledge and Community.

Wihlborgs follows the applicable laws and international conventions in areas covered by the ethical guidelines. Current laws and regulations are always the minimum requirement for operations.

The guidelines apply to all employees and Board members of Wihlborgs and form the basis for how employees treat each other as well as our customers, suppliers, contractors and other stakeholders.

Wihlborgs also expects suppliers to comply with the principles in the ethical guidelines, which are clarified in the Code of Conduct created specifically for suppliers.

## **Ethical guidelines at Wihlborgs**

Approved by the Board of Wihlborgs Fastigheter AB in September 2021.

## **Responsible business, business ethics and anti-corruption**

Operations at Wihlborgs are to be characterised by sound business ethics, impartiality, free competition and respect for contracted agreements.

Anything offered to Wihlborgs employees by customers, suppliers or other parties must always be characterised by openness. Employees are not permitted to accept gifts, rewards or trips from other parties that could, or could be perceived to, influence the objectivity of a business situation.

Furthermore, in the course of performing their duties, Wihlborgs' employees may not use bribes or other forms of reward to arrange business transactions with customers, suppliers or any other parties. Official entertainment and customer events must always be characterised by moderation and a clear connection to operations.

Wihlborgs encourages employees to participate in regional development, but employees may not participate in any private business activities where a conflict of interest with Wihlborgs' interests could arise. All employees are obligated to inform their managers of any activities conducted outside of Wihlborgs.

If any employee engages a supplier/contractor of Wihlborgs for private reasons, the employee's immediate manager must approve the offer with a signature. This is to ensure that employees do not obtain any unwarranted benefit for private use attributable to their employment at Wihlborgs. When requested, employees must also be able to present an invoice/receipt detailing the amount paid for the service/goods.

Further explanation of Wihlborgs' view of responsible business can be found under "Wihlborgs business ethics."

## **Information and communication**

Wihlborgs strives for an open, transparent and constructive dialogue with shareholders, customers, employees and other stakeholders.

All employees are to receive regular information about Wihlborgs' goals, strategies and operational development as well as recurring feedback on their individual work contributions.

Wihlborgs follows the Stockholm Exchange's rules for external disclosure and strives to provide relevant and reliable financial and non-financial information to shareholders and other stakeholders. Information that can affect the valuation of Wihlborgs is to be published without delay. Employees are not permitted to carry out any transaction that would involve utilising inside information.

Confidential information about Wihlborgs' operations, customers and suppliers may not be shared with unauthorised individuals. Personal data pertaining to employees, customers or others is to be processed with due care in accordance with applicable legislation.

## **Politics and societal commitment**

Wihlborgs maintains a neutral position on party-political issues. Wihlborgs' name may not be used by political parties or by individual political candidates.

Wihlborgs has a strong relationship with the Öresund region and supports various organisations and initiatives that aim to develop the local economy and community. All sponsorship is to be characterised by transparency and, as far as possible, have a clear focus on community within the framework of Wihlborgs' sponsorship rules.

Individual employees are encouraged to engage themselves in societal issues and Wihlborgs offers all employees the opportunity to contribute to their chosen initiative during working hours after reaching an agreement with their immediate supervisor.

## **Human rights and working conditions**

Wihlborgs respects and promotes internationally recognised human rights and conventions concerning labour in its own operations as well as the value chain.

Wihlborgs supports diversity and equality. Everyone should always have equal opportunity in terms of employment, training, advancement and development at the company. No discrimination is permitted based on nationality, sex, race, religion, age, sexual orientation, political opinion, affiliation or social or ethnic origin.

In addition, child labour or forced or compulsory labour is not permitted. The minimum age for employment is the age for completing compulsory schooling. Exceptions can be made for holiday jobs and short-term employment. The minimum age is always 15 years.

Freedom of association and the right to collective negotiations and agreements apply at Wihlborgs. Employee representatives must be able to perform their assignments.

The work environment must be safe for Wihlborgs' employees and comply with national laws and agreements. All Wihlborgs properties are to be safe. No one who spends time in or around them is to be in any danger or at risk of injury.

Wihlborgs actively promotes exercise and preventive healthcare to create a better balance between work and leisure. All employees are offered regular health checks and private health insurance.

## **Environmental and climate impact**

Wihlborgs works deliberately to limit the properties' environmental and climate impact during their entire life cycle.

Environmental efforts comprise a strategic issue and are based on well-established management decisions. Environmental issues are integrated into daily activities, and operations are carried out in a resource-efficient manner using Wihlborgs' environmental management system.

Wihlborgs' environmental approach is based on the "Precautionary Principle." The products and services used in operations are to have a minimal impact on the environment.

Environmental and climate knowledge and competence must be gradually developed among all employees.

## **Implementation and follow-up**

Every employee is responsible for following the ethical guidelines and consulting with their immediate supervisor when it is unclear how the guidelines are to be applied. It also part of

an employee's responsibility to alert relevant parties if they believe something is not being handled according to these rules.

In these instances, contact your immediate supervisor, HR Director or the Director of Sustainable Business. If you are not confident that any of these individuals can handle the matter, you can anonymously report breaches through a whistle-blower service. The whistle-blower service is administered by an external party and is accessible via Wihlborgs' website as a last resort when it is not possible to contact any of the responsible individuals at Wihlborgs directly.

Employees that do not comply with the guidelines may be subject to legal action. Should any of Wihlborgs' contractors or suppliers be in serious breach of these guidelines, the business relationship will be discontinued.