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Wihlborgs Fastigheter Code of Conduct

Wihlborgs' Code of Conduct summarises the company's position in key issues and guides employees in how we are to act to conduct our operations responsibly and sustainably.

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, Community. We also support the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

Respecting laws and international conventions in the areas covered by the Code of Conduct is a given for Wihlborgs. Current laws and regulations are always the minimum requirement for operations. The Code of Conduct applies to all employees and Board members of Wihlborgs and forms the basis for how employees treat each other as well as our customers, suppliers, contractors and other stakeholders.

There is a separate "Code of Conduct for suppliers" available on the intranet and our website.

If we identify that our operations or our supply chain have caused or contributed to negative impacts on human rights, we take action. This includes ensuring fair and effective processes for handling complaints and establishing requirements for our suppliers to follow the same principles. This is performed by investigating the reported cases and taking appropriate action.

Responsible business, business ethics and anti-corruption

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

Wihlborgs strives for full transparency when it comes to what customers, suppliers or other external parties offer to Wihlborgs employees. 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 all employees to participate in relevant events to create good business relationships, but employees may not participate in any private business activities where a conflict of interest could arise.

Employees are obligated to notify their manager of any secondary employment or time-consuming commitments that could interfere or compete with Wihlborgs' operations.

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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 "Business ethics at Wihlborgs" on our intranet or website.

All employees, including management, are trained in business ethics in order to ensure awareness of these issues. This includes a review of the Code of Conduct. Supplier awareness is ensured through the "Code of Conduct for suppliers." Training and clear guidelines allow us to strengthen expertise about risks and work preventively.

Information and communication

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

Employees 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 published without delay. Employees are not permitted to carry out any transaction based on 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 processed with due care in accordance with applicable legislation.

Politics and social commitment

Wihlborgs maintains a neutral position on party-political questions. 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 characterised by transparency and, as far as possible, has a clear focus on community involvement within the framework of Wihlborgs' sponsorship rules.

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

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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 under either Swedish or Danish law.

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 (Sweden) and 13 years (Denmark).

Wihlborgs is characterised by freedom of association. The Swedish operations also have the right to collective bargaining and agreements, and 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, clarified in our Work environment policy. All Wihlborgs properties must be safe. No one who spends time in or around them is to be exposed to any danger or at risk of injury.

Wihlborgs works actively with initiatives to promote exercise and good health, as well as initiatives to ensure work-life balance. All employees are offered regular health checks (Sweden)/health questionnaires (Denmark), private health insurance and wellness allowances (Sweden).

Environmental and climate impact

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

Work with the environment and climate is a strategic issue that depends on decisions in management and is integrated into day-to-day work. Operations are resource-efficient and conducted in accordance with Wihlborgs' environmental management system and other policies.

Wihlborgs' work with environmental sustainability is based on the precautionary principle. This means that we take actions to prevent, mitigate and counteract any negative impact on the environment.

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

Wihlborgs' work with the environment and climate is further defined in our Environmental and climate policy and its associated guidelines.

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Implementation and follow-up

Every employee is responsible for following the Code of Conduct and consulting with their immediate supervisor when it is unclear how the Code is to be applied. It is also part of an employee's responsibility to alert relevant parties, ideally an immediate supervisor or HR Manager, if they believe something is not being handled according to these rules. Suspected violations can also be reported anonymously 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, meaning 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.

This Code of Conduct was approved by the Board on 1 June 2025