

# Human Rights Statement

## Our Commitment

Heimstaden is dedicated to being an active and responsible member of society, creating positive effects for our employees, our customers, and the local community in the countries where we operate and beyond. We commit to respect all internationally recognized human rights and have zero tolerance for any form of forced labour, child labour, human trafficking, or any other violation of human rights.

As a UN Global Compact Signatory, we operate in accordance with the Ten Principles related to human rights, labour, environment, and anti-corruption. The Ten Principles derives from the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption. We also adhere to the UN Guiding Principles on Business and Human Rights, which includes ensuring regular human rights due diligence across the organisation and business partners, to minimise the risk of human rights violations and/or complicity therein.

The purpose of this statement is to affirm our commitment to human rights and our commitment against contributing to, participating in, or enabling the use of children, forced, or exploited labour or forced or exploitative conditions and against assisting our business partners in doing so in any way.

## Our Due Diligence Process

We follow the due diligence process recommended by OECD (Due Diligence Guidance for Responsible Business Conduct), and accordingly, cover the following areas:

Embedd in Policies	Identify and assess	Cease, prevent, mitigate	Track and monitor	Communicate	Cooperate/ remediate
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## Policies and management systems

Our human rights commitment is stated in our Sustainability Policy and internal guidelines for employees on how to carry out due diligence is covered in our Sustainability Manual, Procurement Manual, Group Guideline Sponsorship & Donations, and Group Guideline Supplier Screening.

We have a Code of Conduct for employees that all employees are required to sign during onboarding and a Business Partner Principles document that all suppliers must adhere to and sign. Our Business Partner Policy states how we work with our partners and what expectations we set on them. Internal guidelines for employees on how to carry out procurement is found in our Procurement Manual.

In relation to our colleagues, we strive to create good working conditions as set out in our Work Health & Safety Guidelines covered in the People & Culture Manual, covering both psychological and social work environment and physical work environment.

Our People and Culture department provides remuneration guidelines on how to work with compensation, benefits, and rewards. This ensures that remuneration is fair, principles are transparent and that no unexplained differences occur when benchmarking salaries within or across departments.

Our Whistleblower policy specifies how reported cases are to be processed, followed up, and communicated.

#### **Identify and assess adverse impacts**

We use internal research, indices, agreement clauses, signing of Business Partner Principles, supplier screenings, and self-assessment questionnaires as the main tools of assessing our business relationships. We also monitor our largest suppliers.

For our strategic suppliers in Scandinavia, we use self-assessment questionnaires, which cover human rights, labour rights, business ethics and anti-corruption, political stability and rule of law, environmental performance, economic stability, currency, and trade ability. We conduct an annual sustainability risk assessment of new suppliers for centrally negotiated contracts relating to the environment, anti-corruption, work conditions, health and safety, and human rights. If we do not receive satisfactory answers from our suppliers or their responses raise any red flags, we contact the supplier and set an action plan for how to move forward.

We have developed a similar process for screening recipients of sponsorships and donations and have developed internal guidelines for our employees regarding the same.

For equity partners, we have developed a framework for risk assessments that include a country risk matrix, sanctions, and PEP screenings, and third-party advisory.

We regularly review our terms of employment to ensure that they comply with all relevant legislation. We are transparent in our salary and benefits package, and base it on market pay, individual experience and competence, performance and results, and adherence to our values. We make sure our employees understand the basis on which salary is set and thus they are able to influence their salary level by improving work performance, enhancing skills, and taking greater responsibility in the workplace.

To make it easy for our stakeholders to raise concerns or flag risks, we have a Whistleblower function where anyone can anonymously report discrimination, harassment, corruption, or any other irregularities that violate our values or policies. Reporting whistleblowing cases is managed by a neutral third party via a new digital platform to ensure there is no traceability or retaliation risk. Heimstaden also has incident and accident reporting which is done on one common platform where we follow up monthly on all reported incidents, on actions taken

and on the responsibility for these actions. The report is sent to the Board of Directors quarterly.

### **Cease, prevent, and mitigate**

We have not identified any direct human rights risk in our value chain so far, however, as it is well known that the global solar supply chain has linkages to forced labour, we take extra care when buying solar panels.

We have dialogues with our tier 1 and tier 2 solar suppliers, informing them of what we expect from them and asking them to disclose their supply chain and practices, including audits and certificates of guarantee. We also nudge our suppliers to diversify their own supply chains of solar manufacturers, and we collaborate with different private and public industry partners to increase our leverage in the solar industry. We are part of multiple working groups and forums that work to ensure the global solar supply chain can be made free of forced labour.

We have developed separate guidelines for our own employee regarding purchasing solar panels and have given trainings regarding the same.

### **Track and monitor**

- We use employee surveys to closely track employee wellbeing.
- We track customer satisfaction through yearly surveys.
- Heimstaden has set a target that all employees must sign the Code of Conduct for Employees and undergo training.
- We have a target that 100% of our contracted suppliers must sign our Business Partner Principles by end of 2026.

### **Communicate**

We report on human rights in accordance with GRI as part of our annual report. Our UK statement on Modern Slavery is made available on the Heimstaden UK website.

We carry out extensive dialogues with all our major stakeholder groups and report on the activities in detail in our annual report.

Heimstaden provides mandatory e-learning courses for all employees, to be conducted every 18 months. In addition, People & Culture run culture and values workshops to highlight business ethics guidelines, human rights, and working conditions among employees.

### **Provide for cooperation**

Heimstaden has not identified a direct risk to a group due to our business, nor have we been convicted of any violation of legislation. If approached by stakeholders for dialogues, we always oblige.