

CODE OF CONDUCT FOR
business partners



Heimstaden

Why we have a Code of Conduct for Business Partners

At Heimstaden, we care about people as well as the environment. We build lasting relationships, mutually valuable to all parties. We work from common values and expectations of how we should conduct ourselves and do business with integrity and transparency.

Heimstaden's Code of Conduct sets out how we expect our colleagues to act. We live according to our code of conduct and do not accept shortcuts. We demand the same of you as a business partner. Our Code of Conduct for Business Partners regulates how you as a business partner need to conduct yourself. The code of conduct is based on Heimstaden's values *care*, *share* and *dare*, as well as on the UN's ten Global Compacts principles linked to human rights, working conditions, environment and anti-corruption. The code of conduct is an integral part of all contracts between Heimstaden and our business partners.

Who is covered by the code of conduct?

The code of conduct applies to all our business

partners. By business partner we mean all types of contractors, subcontractors and service providers.

As a business partner you are obliged not only to adhere to the code of conduct yourself, but also to ensure that everyone in your supply chain does.

What is expected of you as a business partner?

We expect you to share our fundamental values and act accordingly.

We expect you to actively work to implement our principles of business ethics in your value chain.

We expect you to be honest regarding any particular aspect you are not able to fulfil, so that we can agree immediate remedial actions.



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Human rights and working conditions

We respect and support the UN's universal declaration of human rights and all conventions passed by the UN's international working group ILO. We demand fair working conditions for everyone working within our projects, at our workplaces and in our supply chain. What does this mean for you?

- The products or services you deliver to Heimstaden shall be produced in conditions consistent with human rights.
- Neither you, nor any of your subcontractors, are in any way complicit in violations against human rights.
- You provide working conditions, working hours, salaries and benefits in accordance with applicable national and local regulations, as well as with relevant ILO conventions.
- You ensure employees have valid contracts of employment.
- You do not tolerate any form of human trafficking, child labour or forced labour. This includes other illegal or inappropriate withholding of salary. *Children* refer to persons under 15 years of age, or of higher legal minimum age in cases where local legislation stipulates it.
- You do not in any way limit the freedom and movement of your employees. This includes demanding that an employee hand over their ID card, passport or work permit in order to gain employment.
- You acknowledge and respect employees' right to organise and negotiate collectively, wherever this is in accordance with existing legislation.
- You acknowledge the needs specific to employees under the age of 18 as well as the fact that you have a duty of care towards them.



Work Environment

Health and safety

We are responsible for our employees' health, safety and well-being, as well as that of people affected by our operations. We continuously work towards a healthy, safe, engaging and stimulating work environment where employees thrive, feel included and can influence their own progress as well as that of the company. What does this mean for you?


- Together with Heimstaden and other Heimstaden business partners, you are responsible for maintaining a safe and secure work environment.
- You ensure that your employees and others in the supply chain have the necessary training and equipment to carry out their work tasks in a safe manner.
- You actively support the fact that it is every employee's right and duty to stop perilous work.
- You report to Heimstaden all incidents and work accidents pertaining to our projects and work places.

Everybody's equal rights

We respect all individuals, strive to work as a team and encourage open, straight and respectful communications. We treat everyone equally and provide everyone with the same employment and career opportunities. We do not tolerate any kind of harassment or discrimination. What does this mean for you?

- You treat employees with respect and dignity.
- You do not accept any form of disrespectful behaviour, bullying, discrimination, persecution or sexual harassment.
- You do not discriminate against anyone, rather treat all employees and job-seekers equally and provide them with equal opportunities.
- You encourage and work towards diversity and an inclusive work environment.

Environment and climate

 We want to protect the environment and contribute to sustainable development. We work to minimise the effect on the environment and climate through the lifecycles of our operations, projects, properties and services. What does this mean for you?

- You manage your operations responsibly, respecting the environment and climate.
- You comply with existing environmental legislation.
- You take into account environmental aspects of your operations and protect biodiversity.
- You work actively to reduce emissions to air, soil and water.
- You choose solutions based on the precautionary principle, and with a life cycle perspective in mind.
- You have systems in place to manage waste and hazardous waste, and in doing so support recycling and re-use.
- You minimise the use of dangerous substances and work proactively to prevent pollution.
- You operate efficiently in terms of resources and work actively to reduce energy and water consumption.





Business ethics and anti- corruption

We operate our business ethically and with integrity. We comply with existing legislation and possess all necessary permits, licences and registrations for our operations. What does this mean for you?

- You must follow all applicable legislation as well as our Code of Conduct for Business Partners, including when the code sets stricter requirements than the law (as long as the code does not contradict the law).
- Practices or local traditions never take precedence over legal requirements.
- If you discover that our Code of Conduct for Business Partners contravenes existing legal requirements you must inform the relevant manager at Heimstaden.

Sanctions

We have a sanction policy * which states that we do not cooperate, directly or indirectly, with any person or entity listed as unauthorized on sanction lists and that we do not do business, directly or indirectly, with countries or regions subject to sanctions. What does this mean for you?

As a business partner to Heimstaden, you are vigilant when external parties may be on a sanction list or may have a related company in a country subject to sanctions, and ensure that:

- neither your company nor any of your subsidiaries is currently subject to any sanctions, or
- cooperate, directly or indirectly, with any person, entity, country or region subject to sanctions, or operating in a country subject to any sanctions.

** Sanctions are legal instruments used by governments and multinational bodies to influence foreign affairs (in order to combating terrorism and maintaining or restoring international peace and security) by prohibiting business transactions with certain (individual) countries, individuals, entities or sectors. Sanction lists are maintained by the UN, EU, USA and UK, among others.*

Anti-corruption

We work in accordance with good business practice and have zero tolerance to all forms of corruption, bribes and backhanders as well as hidden commissions. What does this mean for you?

- You run your business with integrity and do not tolerate any form of bribery or corruption.
- Under no circumstances must you demand, receive, pay, offer or sanction bribes, either directly or indirectly.
- You must never try to assert undue influence

on or bribe Heimstaden employees, customers, public servants or any other physical or legal person.

- You ensure that all reports, documents and invoices are complete, correct and not misleading.

Hospitality and gifts

Our hospitality and gifts are characterised by openness and moderation and are naturally linked to the business relationship. We neither demand, receive, offer or sanction any gifts which may influence – our own, our customers' or other partners' business decisions. What does this mean for you?

- You do not offer or receive any entertainment or gifts which may unduly influence – or be seen to unduly influence – business decisions taken by you, Heimstaden, Heimstaden's clients or other parties.
- You respect Heimstaden's policy on hospitality and gifts.
- You report to Heimstaden any instance where a Heimstaden employee demands any type of entertainment, gift or personal favour, for free or at a lower price than in existing discount contracts or than the market value.

Fraud and money laundering

We have zero tolerance to all forms of criminality, fraud and money laundering. What does this mean for you?

- You must under no circumstances take part in criminal operations, fraud or money laundering.
- You must not take part in any transaction which you know or suspect may have links to criminal operations, fraud or money laundering.

Information management

We respect all confidential information pertaining to Heimstaden or our interested parties. We work proactively to prevent confidential information spreading to individuals who do not need or have a right to this information within the remit of their work. What does this mean for you?

- You protect any confidential information you are privy to via Heimstaden, our customers and partners or other parties. Confidential information includes financial and commercial relationships, strategies, plans and technical systems.
- If you gain access to confidential information by mistake, whether it comes from Heimstaden, our customers and business partners or other parties, you refrain from using the information. You contact the sender and notify Heimstaden of what has occurred.

Protection of personal data

We respect everyone's right to have their personal information treated in a secure manner, respecting personal integrity. We handle all personal information with respect for the individual and in accordance with the General Data Protection Regulation, GDPR. What does this mean for you?

- You ensure that all uses of personal data is handled in accordance with existing legislation and regulations. This includes data collection, registration, comparisons, storage and removal or a combination of these.





Compliance and follow-up

As a partner, by approving the code of conduct, you affirm that your company complies with the requirements set out in this document and that you place equivalent requirements on your subcontractors. Where necessary, we are prepared to work with you to ensure your compliance with the code of conduct.

By approving the code of conduct you consent to us performing audits in order to ensure compliance with the code of conduct. Such audits may also be carried out by an independent third party.

In case of a significant breach of the code of conduct you, as a partner, will implement a remedial plan of action agreed between you and Heimstaden. Heimstaden has the right to

terminate any contract with you and your company in the following cases:

- You and your company are unable or unwilling to implement the plan of action.
- You and your company have repeatedly violated Heimstaden's code of conduct.
- You and your company have seriously violated Heimstaden's code of conduct.
- You and your company have deliberately withheld information about a breach of Heimstaden's code of conduct.

Such termination shall take effect from the date specified in a written termination from Heimstaden.



Report suspicious events

Heimstaden will never subject anyone to retribution, who in good faith reports suspicious or proven unethical behaviour, nor do we accept such actions from other parties. You may report a suspicious event to the relevant Heimstaden manager or confidentially and anonymously via the whistle blower form at www.heimstaden.com

If you have any questions regarding the Code of Conduct, please contact
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