

## CODE OF CONDUCT

Balder's Code of Conduct is based on international guidelines such as the UN Global Compact's ten principles on human rights, labor law, the environment and anti-corruption, the OECD Guidelines for Multinational Enterprises, the ILO's core conventions and the UN Guiding Principles on Business and Human Rights.

The purpose of the Code of Conduct is to provide guidelines for acting in internal and external relations as well as in situations when the Code of Conduct is not followed.

The Code of Conduct has been adopted by Balder's board and applies to all employees and representatives of Balder. In addition to the Code of Conduct, operations are governed by a number of policies and guidelines regarding specific areas such as work environment, communication, rental, purchasing and sustainability.

The following principles shall form the basis for Balder's operations and the actions of all employees:

### Responsible relationships

In all relationships, both internally and externally, we must be open, helpful and committed. We show integrity and are careful so that we do not end up in situations of conflict, bribery or the like. As a public company, we also have a responsibility to follow laws and regulations for what and how we communicate.

Balder does not tolerate any forms of corruption, extortion or bribery. The company's operations must be conducted in an open and honest manner, which in no way impedes competition or benefits any individual party. This applies both internally and externally in relation to partners, customers and other stakeholders. Situations where personal interests end up in conflict with the company's interests must be avoided, and all employees are expected to be careful about the company's resources and handle information with the company's best interests in mind.

### Good working environment and respect for human rights

Balder strives to create a good working environment based on gender equality and diversity, where the integrity of employees is safeguarded. No discrimination may take place on the grounds of age, sex, sexual orientation or ethnic background. The employees' personal development is important, and Balder works to offer good career opportunities and promote internal recruitment. The company's goal is to strive for equality and diversity at all levels, which is also taken into account in recruitment situations. All forms of harassment are prohibited, as well as abusive discrimination. The company distances itself from all forms of forced labor and safeguards employees' freedom of expression and the right to association activities.



## Responsibility for the environment

Balder works continuously to reduce the company's climate impact and emissions. The goal is to reduce the environmental impact in each process as far as possible. This is done, among other things, by reducing energy use, improving waste recycling, streamlining transport and taking the precautionary principle into account when choosing materials or handling chemicals. It is equally important to work to make people feel good in the company's properties by offering a good indoor environment.

## Implementation and follow-up

This Code of Conduct has been distributed to all Balder employees and can be found on the company's intranet. Internal training in the content and compliance of the Code of Conduct is held regularly, and is also part of the introductory training for new employees, within the framework of Balder Academy.

Balder aims to maintain a culture of openness and high ethics in the company. Honesty and respect for all the company's stakeholders are appreciated. In case of suspicion of violations of this Code of Conduct or other policies, it is the duty of every employee to report this, either to the immediate superior or anonymously to Balder's whistleblower service via [vissla.balder@gothiaprotection.com](mailto:vissla.balder@gothiaprotection.com).

Policy approved 2021-02-11

The Board of Directors at Fastighets AB Balder