

## CODE OF CONDUCT

The purpose of the Code of Conduct is to provide guidelines for responsible actions in internal and external relationships, and to specify which fundamental requirements exist in all situations.

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

The Code of Conduct has been adopted by Balder's Board of Directors and applies for all employees and representatives of Balder. In addition to the Code of Conduct, the business is governed by a number of policies and guidelines in respect of specific areas such as health and safety, equality and diversity, communication, letting, purchasing and sustainability.

The following principles shall form the basis of Balder's business and the actions of all employees.

### **Responsible, business-ethical relationships**

In all relationships, both internal and external, we shall be open, helpful and engaged. We display integrity and are cautious, so that we do not end up in situations with conflicts of interest, bribery or the like. As a public company, we also have a responsibility to follow laws and rules governing what and how we communicate.

Balder does not tolerate any form of corruption, extortion, money laundering or bribery. The company's business activities shall be conducted in an open, long-term and honest way that does not in any way impede competitiveness or benefit any particular party. This applies internally and externally in relation to business partners, customers and other stakeholders. Situations in which personal interests come into conflict with the company's interests must be avoided, and all employees are expected to be careful with the company's resources and handle information with the best interests of the company in mind.

There must be no violations of current legislation on the offering and acceptance of bribes. Balder has clear guidelines defining the rules for gifts and entertainment, and all employees shall follow these.

### **A good work environment and respect for human rights**

Balder strives to create a good, healthy work environment based on equality and diversity, where the privacy of employees is safeguarded. There must be no discrimination on the basis of age, gender, gender identity, religion, disability, sexual orientation or ethnic background. All forms of harassment are forbidden, as is

discrimination. The company distances itself from all forms of child and forced labour, and safeguards employees' freedom of expression and right to freedom of association.

The personal development of employees is important, and Balder strives to offer good career opportunities and promote internal recruitment. The company's goal is to strive at all levels to achieve equality and diversity, and this is also considered in recruitment situations.

There are additional guidelines in Balder's Equality and Diversity Policy and the Health and Safety Policy.

## **Responsibility for the environment**

Balder works continuously to reduce the company's environmental impact and climate emissions. The goal is to reduce the environmental impact as much as possible in each process. This is done by such means as reducing energy and water use, improving waste recovery, converting to fossil-free and renewable sources and observing the precautionary principle when choosing materials and handling chemicals.

There are additional guidelines in Balder's Sustainability Policy.

## **Implementation and follow-up**

This Code of Conduct has been distributed to all employees of Balder and is available on the company's intranet and website. Internal courses on the Code of Conduct's content and compliance are held regularly, and also form part of induction training for new employees, within the framework of the Balder Academy.

Balder has a goal of maintaining a culture that is characterised by openness and being a long-term, responsible actor that displays sound business ethics. It is important for us that irregularities and cases of misconduct are highlighted and investigated as quickly as possible. If there is any suspicion of violations of laws, rules or this Code of Conduct, it is every employee's obligation to report this. This can be done via their manager, Head of HR or anonymously via Balder's whistleblowing service,

Policy adopted 10/02/2023

**The Board of Directors of Fastighets AB Balder**