

# CODE OF CONDUCT FOR SUPPLIERS

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## Code of Conduct for Suppliers

This policy is applicable to all suppliers of Nordiqus AB and Nordiqus AB:s group companies, hereinafter referred to as the "Company". When this policy refers to the Company, if nothing else, Nordiqus AB and its group companies are mentioned.

### 1. Introduction

The purpose of this Code of Conduct for Suppliers is to define a business ethics compass for the Company as a business partner, employer, employee, and community actor with the aim of maintaining a high level of trust in the Company among customers, business partners, employees, shareholders and the market.

Also to define the company's position and guidelines for engagement in sustainable societal development. The company's sustainability work is based on the company's vision for 2030, a continuous dialogue with stakeholders and the company's values of long-term and reliable ownership and management. All suppliers and business partners are responsible for keeping themselves informed on both the Sustainability Code and other applicable policies within the company, as well as regarding applicable legislation. The company shall govern its operations in line with the international climate agreement (Paris agreement) with the overarching target of climate neutrality by 2050 and a property portfolio adapted to minimize climate related risks. The company shall apply a life cycle perspective on its operations and adopt a responsible use of natural resources and promote biodiversity.

All employees, including all managers, are responsible for keeping themselves informed on both the Code of Conduct and other applicable policies within the Company, as well as regarding applicable legislation. The Company is reliant on the trust of its tenants, its tenants' customers, its employees, its shareholders, and its partners. It is only by maintaining a high level of trust that the Company can continue to be a successful and long-term player in social infrastructure. The Company's Code of Conduct defines a business ethics compass for the Company – the Code sets out clear standards as to how we are expected to behave as business partners, employers, employees, and societal stakeholders.

### 2. To whom does the Code apply?

The Code of Conduct applies to all the Company's suppliers and business partners, including contractors, consultants and other business partners working within the Company's operations. The Company's Code of Conduct also applies to joint ventures and other operations in which the Company has a holding.

The Company expects its suppliers to be familiar with the contents of the Code of Conduct and to consider how it can apply to their tasks. It is the responsibility of all to lead by example.

# **Nordiqus**

The Company has global business activities and is subject to the supervision of numerous regulators. The Company expects all Vendors to:

- Understand and comply with applicable laws and regulations.
- Maintain all appropriate licenses, permits and other regulatory authorizations and requirements necessary to conduct the activities for which they have been hired.

## **3. Working environment and professional behaviour**

The Company's suppliers are expected to perform their duties in a professional, responsible, respectful, conscientious, and ethical manner, and to act in the best interests of the Company. This applies to contacts with the Company's customers, employees, partners, and other stakeholders. The Company's equipment and property are to be treated with due care and judgement and are to be used only for their intended purposes.

The Company complies with applicable laws, agreements, and regulations regarding working hours.

The Company does not accept any form of disrespectful behaviour, bullying, discrimination, isolation, harassment, or molestation in the form of, for example, sexual advances. Harassment is intended to denote undesirable behaviour that violates the dignity or integrity of an individual.

The Company does not tolerate any form of forced labour.

The Company supports the abolition of exploitative child labour. In the event of any recruitment of employees below the age of 18 (which may occur under exceptional circumstances, mainly during vacation periods or in the form of internships and the like), the company complies with applicable working environment regulations regarding the employee's age, including the observance of working hours and level of responsibility, etc.

## **4. Laws, rules and regulations**

The Company adheres to the legislation, rules, and regulations relevant to its operations. The Company requires its business partners to act in a similar manner.

The Company also supports international standards in human rights, working conditions, the environment and anti-corruption. The Company supports the UN Global Compact and undertakes to apply its ten principles of human rights, labour law, the environment and anti-corruption based, which are based on the UN Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against Corruption.

## 5. Environmental impact

The Company has undertaken to mitigate any negative effects on the environment that the Company's operations may cause. The Company always strives to use energy-efficient equipment and processes in the Company's operations. The Company's suppliers must report any discrepancies detected that impact the environment at the properties managed by the Company.

The Company always encourages the Company's partners and subcontractors to comply with environmentally friendly procedures.

All suppliers bear responsibility for:

- Work to minimize the Company's environmental impact and energy consumption in new production and property management
- View environmental impact from a lifecycle perspective
- Minimize the environmental impact of transport
- Strive towards never using materials that are classified as environmentally hazardous. Every deviation from this shall be registered in a follow-up system and approved by an appointed employee with responsibility for quality management
- Minimize waste and use of waste and resources responsibly
- Comply with laws and regulations and to ensure that the Company's environmental work is arranged in accordance with the environmental objectives of society

# Nordiquis

## 6. Business ethics, anti-corruption measures, anti-competitive behaviour, and money laundering

The Company follows current regulations on combating money laundering and expects the same from its suppliers and business partners.

The Company applies zero tolerance of bribery and behaviours aimed at generating business advantages through the provision of gifts, entertainment, or benefits. Any attempt to bribe anyone should be reported to the nearest manager or to company management.

Gifts, entertainment, remuneration and personal benefits may only be offered or received if they are of low value and in accordance with normal business practices. No gifts, entertainment or personal services may be offered that violate any applicable law or Code of Conduct. Nor may suppliers receive any gift, entertainment or personal service that may be believed to have an impact on business transactions.

The Company's suppliers shall not participate in any collaboration or behave in any other manner that could be perceived as restricting competition.

The Company's employees and suppliers are aware that the information, working documents and systems provided by the Company, or which are developed based on information provided by the Company, and which are not public, must be treated as confidential. The Company's employees and suppliers show caution in handling the company's documents and information.

## 7. Alcohol and drugs

All employees and suppliers must be sober and drug-free during working hours.

## 8. Reporting suspected abuse

If a violation of the Code is detected, the violation will result in an investigation that may lead to disciplinary action such as a warning, termination, dismissal or even prosecution. Suppliers who detect violations of the Code of Conduct should report the violation to their nearest manager or to a senior manager as soon as possible. In the event you do not want to report violations to your manager, you can also make a report directly to Nordiquis' CEO or through Nordiquis' Reporting Hotline. The Reporting Hotline is managed by an independent third party and allows anyone to confidentially call or submit a report online, and anonymously (if they choose) report suspected Wrongdoing. The Reporting Hotline is available toll-free, 24 hours a day, 7 days a week.

- Reporting Hotline: +800-603-2869 or online: <https://report.syntrio.com/nordiquis>.

# Nordiqus

## 9. Compliance

The principles of the Code of Conduct are reviewed on an ongoing basis as a natural part of the company's operations.

If a supplier fails to act in accordance with the Code of Conduct, appropriate measures will be taken. If a business partner repeatedly or seriously violates the Code of Conduct, the Company's collaboration with that business partner will be terminated.

### **Code of Conduct for Suppliers – Statement of Compliance**

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I have received, reviewed and understand the Code of Conduct for Suppliers ("the Code") of Nordiqus AB (the "Company").

I hereby agree to comply with the Code, including its provisions for nondisclosure of information both during and after my assignment.

To the best of my knowledge **[check the applicable box]**:

- I am not involved in any situation that conflicts or might appear to conflict with the Code.
  
- I have promptly disclosed to **my contact person at Nordiqus** all conflicts or potential conflicts with the Code that I have been involved in since the date of the last Statement of Compliance signed by me, and such conflicts have been resolved to the Company's satisfaction.

I also agree to notify my contact person at Nordiqus immediately of any change that might adversely affect my compliance with the Code.

<b>Name:</b>	_____	(Please print)
<b>Company:</b>	_____	
<b>Position/Title:</b>	_____	
<b>Location:</b>	_____	
<b>Date and Signature:</b>	_____	_____
	(yy/mm/dd)	(Signature)