HUFVUDSTADEN CODE OF CONDUCT

Hufvudstaden Code of Conduct.

Hufvudstaden's history dates back more than 100 years. Founded in 1915, it has developed into one of the leading property companies in Sweden with a very strong brand that represents exceptional quality, first-rate service and long-term thinking. Hufvudstaden's success can be attributed largely to the responsible actions of its employees, which is reflected in the trust shown in us by external parties. Our corporate culture, values and Code of Conduct guide us in our common vision for sustainable enterprise. The Code of Conduct sets out how we, our suppliers and our business partners should act as representatives of Hufvudstaden, ensuring that confidence in us remains consistently high. With the trust and support of external parties and stakeholders, we can continue to develop our operations with a new one hundred-year perspective.



Our culture, our values and our Code of Conduct.

Hufvudstaden's corporate culture is characterised by a high level of involvement on the part of its employees and clear, well-founded values that permeate the company on every level. Our values are a key means of driving business forward and in doing so realising the company's vision and goals and establishing a firm foundation for responsible enterprise. Our core values are:

QUALITY

We deliver the high standard of quality that our customers expect. This applies not only to our property holdings and our service provision but also to our customer relations and collaboration within the company.

HONESTY

We act professionally and reliably in every situation. We keep our word and abide by our agreements.

ATTENTIVENESS

We are aware of and open to ideas and influences from the world around us. It is particularly important that we are alert to the needs of our customers and that we constantly endeavour to remain one step ahead.

COMMITMENT

We are committed to our work on every level. This means that we are also involved in the work and success of our customers and business partners.

Our values guide us in business and in the way we act towards colleagues, customers, business partners, suppliers and owners. This Code of Conduct sets out the type of behaviour that our stakeholders can expect of Hufvudstaden employees. We in turn expect our suppliers and business partners to also act in compliance with the Code of Conduct when carrying out work for us or when they represent Hufvudstaden.



Hufvudstaden on the market and in the community.

It goes without saying that we should always act in compliance with laws and regulations, UN human rights and ILO's eight core conventions. Our procedures and systems should be well above the minimum standard in terms of legal requirements and our firm commitment to sustainable development is vital to the long-term financial success of the company.

The property sector accounts for a significant proportion of energy use and climate impact. Hufvudstaden endeavours to mitigate its impact by employing innovative solutions to continuously lower energy consumption. When purchasing, we evaluate products and services from a quality, safety, health and environmental perspective. We also demand that our suppliers take steps in their business operations to reduce their climate impact, offer a good, safe working environment and demonstrate respect for human rights.

We play an active role in urban development in Stockholm and Gothenburg, not only in the development of our properties but also through working groups, projects, networks and initiatives. The ultimate aim is to enhance the attractiveness and sustainability of these two cities.

Our employees.

Hufvudstaden should be an attractive employer with a stable, long-term relationship with its employees. Our aim is to attract, develop and retain qualified and motivated employees.

Hufvudstaden should offer a good working environment. By doing so, we promote physical and social well-being and avert work-related injuries and diseases.

The company is committed to equality of opportunity for all employees. We focus on diversity throughout the organisation. We do not condone any form of intimidation, inequity or degrading treatment and we work to counteract discrimination. When we recruit or promote employees, decisions are based purely on the requisite skills and qualifications and are made regardless of nationality, gender, religion or belief, sexual orientation, functional impairment or age.

All employees are given the opportunity to develop in their professional role. They also have access to preventive healthcare, health-promoting initiatives and private healthcare insurance.

We are committed in our work and we should always be seen to act professionally. Communication should take place openly and employees are entitled to receive and seek the information they require to discharge their duties optimally.

We do not tolerate bribes, corruption or unpermitted payments. We are restrictive with regard to business gifts and business entertainment. The business entertainment that we take part in always has a clear link to our operations.

We act for the good of Hufvudstaden and avoid conflicts of interest. A conflict of interest can arise when private interests, activities or relationships risk impacting negatively on Hufvudstaden. We do not have secondary employment that competes with Hufvudstaden's operations and which could harm the company's reputation and put the employees in a situation where their impartiality is compromised.



Our suppliers and customers.

Hufvudstaden's objective is to have the most satisfied customers in the industry. We should be a reliable, long-term business partner for suppliers, tenants and contractors. We impose clear, reasonable demands on our business partners.

We identify, evaluate and select our business partners based on quality, reliability, price and delivery capability. We demand that sustainability aspects are integrated into our business partners' operations and we expect compliance with rules related to the working environment, working hours and minimum wage levels. We try to establish a good, healthy working environment where human rights are respected. A good working environment and operating safety are always our first priority.

We support and strive to bring about fair competition. We do not play any part in practices that conflict with free competition or are in breach of competition law.

We endeavour to safeguard the company's and our customers' assets, both tangible and intangible. We handle classified business information with care, both during the time we are at the company and after we leave our employment.

Shareholders.

Hufvudstaden should be perceived as, and prove to be, the most attractive property company in Sweden.

At Hufvudstaden, sustainability work involves assuming long-term responsibility for financial development as well as environmental and social issues. Hufvudstaden should be a safe, secure alternative. Our objective over time is to offer continuous growth in value with a low level of risk.

In our task of providing shareholders, analysts and investors with a fair and correct picture of Hufvudstaden's operations and financial position, we constantly seek to establish an open dialogue based on clarity, accessibility and reliability. Hufvudstaden should have strict reporting standards that result in the publication of rapid, transparent, operationally related information on a regular basis.

Follow-up of the Code of Conduct.

The Code of Conduct sets out how we should act to ensure that confidence in Hufvudstaden remains strong over time. Managers are responsible for maintaining an ongoing dialogue about values and how we must comply with the Code of Conduct in our dayto-day work. All employees receive training in our values and Code of Conduct. Each individual employee is responsible for being aware of and observing the Code of Conduct.

We are mindful of the importance of maintaining an open dialogue with our employees and our stakeholders. We would appreciate if you could pass on to Hufvudstaden any views you may have regarding the way we act or matters related to the Code of Conduct. Hufvudstaden's whistleblowing service is an encrypted web solution which leads to a closed system provided by a third party. It is not intended to replace internal information and reporting channels, but is intended only to complement these channels.

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