

## Code of Conduct for employees

### About Hufvudstaden

*Hufvudstaden is a long-term property owner whose main focus is high quality, great service and enduring business relationships. The company was founded in 1915 and currently owns 29 properties with attractive office and retail premises in central Stockholm and Gothenburg. The Group includes AB Nordiska Kompaniet, which owns the NK brand with department stores in Stockholm and Gothenburg, with its subsidiary NK Retail AB operating parts of the retail business. We cooperate with our tenants and partners to create safe and vibrant marketplaces with the objective of strengthening our customers' competitiveness.*

*We offer successful businesses attractive premises in central locations.*

### 1. Introduction

This Code of Conduct serves as principles for how we as employees are to act to promote a safe, respectful and professional work environment and to ensure that we represent Hufvudstaden in the best possible way.

The Code of Conduct is based on the UN Global Compact and its principles on human rights, labour, the environment and anti-corruption, the UN Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO Fundamental Conventions.

### 2. Scope

This Code of Conduct applies to all employees and contracted personnel in the Hufvudstaden Group.

### 3. Key focus areas in our Code of Conduct:

#### 3.1 Values and corporate culture

- We strive for **quality** in everything we do.
- We act with integrity and **honesty**.
- We show **commitment** and **sensitivity** to each other, our customers, our partners and our surrounding community.
- We actively promote a positive and inclusive corporate culture.
- Our values must permeate and provide guidance in everything we do.
- Our managers act in accordance with leadership criteria: inspiring, forward-looking, exemplary and courageous.

## **3.2 Responsibility and professionalism**

- We comply with Hufvudstaden's policies and guidelines, as well as collective bargaining agreements that apply to our business.
- We respect our colleagues, customers and partners regardless of gender, age, sexual orientation, ethnic affiliation, disability, religion, gender identity or other personal characteristics.
- We take responsibility for our work tasks and our performance supports the company's development.

## **3.3 Communication and partnership**

- We encourage open and respectful dialogue where everyone's opinions are valued.
- We share information in a professional and constructive manner.
- We process confidential information responsibly.
- We manage conflicts professionally and look for solutions that benefit all parties.

## **3.4 Ethics**

- We do not engage in any sideline occupations that compete with Hufvudstaden.
- We avoid conflicts of interest and always prioritise the company's best interests.

## **3.5 Bribery and corruption**

- We never tolerate bribery or improper gifts, services or benefits.
- We never offer bribes or improper benefits to influence the decisions of others.
- We avoid purchasing services and products from relatives and friends.
- We comply with applicable legislation.

## **3.6 Safety and well-being**

- We work to ensure a safe workplace.
- We promote a healthy balance between work and private life.
- We support colleagues and promote a work environment where everyone can thrive and develop.

### **3.7 Relationships with suppliers, partners and customers**

- We manage all relationships fairly, professionally and with respect.
- We base our relationships on objective criteria such as quality, price, sustainability and business ethics.
- We avoid personal relationships or conflicts of interest that could influence our judgement in our partnerships – for example, hiring any of Hufvudstaden’s suppliers in a private context is not permitted.
- We work to ensure that our suppliers comply with relevant legislation, including requirements for working conditions, the environment and human rights.

### **4. Monitoring and compliance**

Monitoring and evaluation will be carried out on a continuous basis to ensure compliance with this Code of Conduct by all employees and contracted personnel.

- All employees and hired personnel undergo regular training in the Code of Conduct in order to understand its content and application.
- Our managers ensure that the Code of Conduct is regularly discussed in meetings and performance and career development reviews.
- Employees are encouraged to report suspected violations anonymously via Hufvudstaden whistleblowing system, or directly to their supervisor or HR.
- Regular internal reviews are conducted to ensure compliance with the Code of Conduct.

This policy is in effect until further notice and will be reviewed as needed.