

## Code of Conduct for suppliers

### 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 our shared principles for ensuring that our suppliers act in accordance with Hufvudstaden's values and sustainability targets. All suppliers and partners are required to comply with this Code in their operations and in their commitments towards Hufvudstaden.

Hufvudstaden and our suppliers must comply with applicable laws, ordinances and international standards. We expect suppliers to act in line with 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

The Code of Conduct applies to all of Hufvudstaden's suppliers and partners, who are responsible for adopting the same or similar standards for their sub-suppliers to ensure that the requirements are met across the value chain.

### 3. Principles for suppliers

#### 3.1 Social responsibility

We expect our suppliers to maintain the following standards for social responsibilities and working conditions:

##### Human rights:

- The supplier must respect and comply with internationally recognised human rights in accordance with the UN Guiding Principles on Business and Human Rights.
- Zero tolerance towards all forms of child labour, forced labour and human trafficking.

##### Working conditions:

- Pursue systematic occupational health and safety activities to prevent accidents and work-related illness.
- Working conditions and remuneration must correspond with national legislation.
- Promote diversity, equality and inclusion, and not permit discrimination based on sex, age, ethnic affiliation, sexual orientation, disability, transgender identity or expression, religion or other expression of faith.
- Ensure the right to freedom of association and collective bargaining.

### 3.2 Business ethics

Hufvudstaden is building long-term business relationships based on honesty and transparency. Our suppliers must:

- Prevent and counteract all forms of corruption, bribery and other unethical business methods.
- Pursue their operations in accordance with applicable competition legislation.
- Process confidential information responsibly.
- Identify and avoid situations where personal or economic interests could impact the partnership with Hufvudstaden, and immediately report potential conflicts of interest.
- Protect Hufvudstaden's and customers' assets, both tangible and intangible.

### 3.3 Sustainability and environment

Hufvudstaden will actively promote sustainable development. Our suppliers are expected to support this by:

- Actively reducing their environmental impact and support the Paris Agreement targets for net-zero emissions.
- Complying with relevant environmental legislation and ordinances.
- Promoting energy efficiency solutions.
- Promoting a circular economy through re-use of materials, use of renewable resources and preventing the generation of waste.
- Managing resources responsibly.
- Hazardous substances and chemicals must be managed responsibly and in accordance with laws and industry standards.

- Applying the precautionary principle by proactively identifying, assessing and minimising potential risks to health and the environment.

## **4. Monitoring and compliance**

### **4.1 Monitoring**

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

- Suppliers must regularly evaluate and monitor their sustainability activities.
- Hufvudstaden retains the right to conduct audits and inspections, or other similar reviews, of suppliers to verify compliance with the Code of Conduct.

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

### **4.2 Reporting irregularities**

Hufvudstaden offers a whistleblowing system that makes it possible to anonymously report suspected violations of the Code of Conduct. The system is a safe and encrypted online solution that is provided by a third party.

### **4.3 Management of deviations**

Suppliers who do not meet the requirements in the Code of Conduct must take corrective action and demonstrate clear improvement. Hufvudstaden can offer guidance as needed, but it is the supplier's responsibility to ensure that the requirements are met. If action is not taken or the will to improve is absent, Hufvudstaden retains the right to terminate the partnership with the supplier.