

Code of Conduct

For suppliers

Issuer: Nyfosa AB, 559131-0833

Date: 2021-07-01

1. INTRODUCTION

This Code of Conduct is based on Nyfosa's internal Code of Conduct and Sustainability policy, and on internationally recognized conventions concerning human rights, labor and international environmental and anti-corruption regulations.

Nyfosa is a transaction-based and opportunistic property company in which business activities are in focus. Nyfosa acquires, manages, adds value to and sells properties independent of geographic location and property type. Read more at https://nyfosa.se/

The company has a responsibility to its owners, employees, tenants and suppliers to act correctly pursuant to applicable rules and regulations. The company has a zero-tolerance policy regarding corruption, discrimination, harassment, crime and environmental breaches. To reduce risks and to maintain confidence in our operations, it is important that suspected irregularities are detected and resolved at an early stage. Employees and suppliers are therefore urged to report any suspected breaches of Nyfosa's Code of Conduct for Suppliers and other policies or suspicion of fraud, money laundering or the financing of terrorism. Employees can report breaches to their immediate superior or by using the whistleblower function on the company's website. Suppliers are also urged to report any suspicions using the whistleblower function.

2. COMPLIANCE WITH THE CODE OF CONDUCT

It is the responsibility of partners and suppliers to follow Nyfosa's Code of Conduct.

Nyfosa retains the right to ensure compliance with the Code, either by itself or through a third party. The requirements of the Code of Conduct must also be reflected in the suppliers' agreements with their subsupplier and suppliers.

If the supplier deviates from the requirements and a substantial breach takes place – and no improvement can be demonstrated within an agreed period – Nyfosa has the right to terminate the agreement with immediate effect.

3. NYFOSA'S REQUIREMENTS ON SUPPLIERS

This specification of requirements has been prepared in order to ensure fulfillment of Nyfosa AB's requirements for signing contracts and ordering goods and services.

If there is conflicting information in the contract documents, these requirements apply as minimum requirements.

Basic requirements:

- 1. Suppliers accept and fulfill Nyfosa's Sustainability policy and this Code of Conduct
- 2. Suppliers possess a corporate tax card (approved F-skattsedel)
- 3. Suppliers manage value added tax and other tax in a responsible manner
- 4. Suppliers have signed the necessary Liability insurance
- **5.** Suppliers are responsible for ensuring that any sub-suppliers that are used comply with this requirement specification.

As a minimum, operations must be conducted in compliance with the applicable laws, rules and regulations in each country in which we or our suppliers operate.

Suppliers that supply goods and services to Nyfosa must also conduct their own operations based on the requirements defined below:

Child labor

The supplier agrees to ensuring that child labor does not take place in the operation's supplier chain.

Salaries and terms of employment

Suppliers agree to follow the rules concerning the statutory limits for minimum wage, working hours and overtime as stipulated in national legislation. Salaries are paid directly to the employee in the agreed time and, as a minimum, no less than the minimum wage that is defined by local legislation or labor agreements.

Occupational health and safety

The supplier agrees to fulfill all of the applicable laws concerning labor requirements for the health and safety of its employees. All employees must be informed of any health risks that the work duties may present and have access to the relevant protective equipment to be able to work in a safe and healthy environment. Written worker protection instructions must be available for all employees. The supplier must also document all accidents in their operations and take preventive measures to minimize risks. Transportation to Nyfosa's offices and properties must take place safely and comply with Swedish legislation.

Equal opportunities and diversity

The supplier agrees to actively promote gender equality and diversity in its own organization, the Board of Directors and in relation to its customers. The supplier must act to prevent discrimination, threats and harassment as a result of ethnicity, gender, religion, social origin, handicap, political views or sexual orientation in the workplace.

Freedom of association

The supplier agrees to respect the employer's union rights, the freedom to join a trade union and the right to collective bargaining. The supplier must actively support the employer's right to join a union in their employment contract.

Bribes and prohibited impact

Nyfosa has a zero-tolerance policy against bribes and other prohibited impact and we expect our suppliers to actively take a stand for sustainable business practices and set stringent requirements that the company, its employees and contractors are to follow. Giving or receiving gifts or other benefits as part of business agreements is not permitted. Any type of behavior that impacts activities that could create a sense of duty or gratitude or could risk impacting the receiver's decisions or manner of performing their work duties is not permitted. These requirements on suppliers are based on Code to Prevent Corruption in Business established by the Anti-Corruption Institute.

Environment

Suppliers must conduct active environmental work with the aim of limiting and reducing environmental impact. Suppliers to Nyfosa must possess knowledge of their environmental impact.

- Emissions that impact the environment through, for example, heating, transportation or other fuel. Emissions must be reported as carbon-dioxide equivalents.
- Heavy metals and chemicals in consumables, in production or in the final product must be inventory registered, limited or replaced in accordance with the substitution principle. Swedish law is to be used as a limit value.

Special requirements for operations, service and contracting work, etc.

Special reporting

1. Suppliers must, if agreed to in conjunction with procurement, report using the Position Green system. The aim of such reporting is that Nyfosa wants to collect data concerning its total carbon emissions.

Quality, environment and work environment

- 1. Suppliers have a written environmental policy that employees know about.
- **2.** Suppliers have documented training with qualification in Principal Contract (BAS-U) or Principal Designer (BAS-P) in applicable areas.
- **3.** Suppliers and contracted sub-suppliers are authorized pursuant to applicable industry rules for each category. Contracting work is carried out pursuant to the applicable AMA regulations and industry rules.

Choice of materials

- 1. The substitution principle is applied, which means that the replacement rule of the Swedish Environmental Code concerning chemical products, hazardous chemicals and other products are replaced with less harmful products or methods when possible.
- 2. Construction materials must be approved, for example: Sound buildings or the equivalent

Waste and reuse

- 1. Selective demolition must be used if possible
- where the stocktaking of demolition objects shows that it is possible to reuse the construction materials
- where there is hazardous waste
- **2.** For the environmentally sound management of construction and demolition waste, the supplier must train personnel in the removal of:
- Construction and demolition waste (environmentally friendly work methods, removal)
- Hazardous waste (identification, environmentally friendly demolition methods, removal)
- 3. Suppliers must sort their waste in accordance with each municipality's refuse regulation
- **4.** Suppliers must manage and transport hazardous waste in accordance with the provisions of the waste regulations and the municipality's refuse regulation. A special permit for the transportation of hazardous waste must be applied for from the County Administrative Board..

Indoor climate and energy consumption

- 1. Heating, ventilation and cooling systems must be designed to provide favorable air quality that is perceived as healthy without generating drafts or sound.
- **2.** Lifecycle costs must be assessed when choosing between installation systems. Efforts must be made to minimize energy consumption during operations and set these costs in relation to the function of the system.
- 3. Cooling systems must be operated with permitted refrigerants and secondary refrigerants.
- **4.** Baffles, transfer air devices, suspended ceilings, etc. must be designed to provide a high quality sound climate in and between workplaces.
- **5.** Lighting and office equipment must be designed and selected with the aim of creating a good lighting environment and low energy consumption.
- **6.** Pressure in the ventilation system must be kept low to reduce the electricity used to run ventilation fans and to minimize the risk of noise disturbance. Aggregates and motors must be installed with vibration damping and low-frequency noise disturbance.
- 7. Installations for ventilation, cooling and lighting must be installed so that they can easily be changed and their functions be adapted due to changing operational conditions and the use of premises.
- **8.** Building components and systems with relevant material and components must contribute to a healthy indoor environment by being designed to generate (the precautionary principle) low emissions (the release of chemical elements) and to prevent the formation of hazardous damp.

Transportation and fuel

- 1. The supplier's vehicles must be selected based on the best possible sustainable choices. Passenger cars may have a maximum emission of 160 g carbon per kilometer (WLTP).
- **2.** Transportation by the supplier must be planned and carried out with the minimal possible environmental impact.
- **3.** Machinery and hand-held tools must use environmentally friendly fuel and be used in an environmentally friendly manner, for example, equipped with catalysts if possible

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Place and date				
Company name,	Corp. Reg. No. ("	 The Supplier")		

Printed name, position	