

Reledo

Our Reledo

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Content

1	Introduction Our Reledo.....	2
2	Internal Code of Conduct.....	4
3	Sustainability policy.....	8
4	Work environment policy	12
5	Policy for equality and diversity	14
6	Whistleblowing Policy	17
7	Supplier Code of Conduct.....	19
8	Policy for follow-up and external control.....	23
9	Appendix A: ESG Process.....	24
10	Appendix B: Systematic work environment management	29
11	Appendix C: Guidelines for the whistleblower service	32
12	Appendix D: Routine description for calculation and reporting of climate footprint	37
13	Appendix E: Routine description for control of subcontractors	42
14	Appendix F: Gift log	43

1 Introduction to Our Reledo

Our vision is to be a **leading player in facility management with the most satisfied customers and employees**. We achieve this, among other things, through our Mission, which is to be a **partner for small and medium-sized companies that want a customer-oriented and flexible supplier that can offer both individual services and complete solutions**.

Our watchwords are curiosity, respect and cooperation, and this forms our core values. As an employee of Reledo, I am thus characterized by:

- Curiosity – we are constantly learning new things to be able to develop ourselves and Reledo
- Respectfulness – we always treat our colleagues, customers and suppliers with respect
- Collaborative – we work internally and with our customers to deliver the highest quality services to satisfied customers

This document – Our Reledo – is a handbook for our sustainability work, which we have chosen to call "Our Reledo". Here you will find all of Reledo's sustainability-related policies gathered. There are two main reasons why we work systematically with these issues – it (i) is important for Reledo, our employees and our surroundings and (ii) strengthens our competitiveness and makes us a more interesting partner for our customers. We expect all employees of Reledo's companies to comply with the policies and guidelines described in this document. Certain policies are also expected to be complied with by Reledo's subcontractors, suppliers and other partners.

Our Reledo is structured in such a way that each policy is described in relation to (i) background and purpose, (ii) target group, (iii) roles and responsibilities and (iv) compliance. Our Reledo also contains various appendices (i.e. appendices) with descriptions regarding processes, procedures, working methods and guidelines associated with the policies.

Overview of all policies that make up Our Reledo:

- Internal Code of Conduct
- Sustainability policy
- Work environment policy
- Policy for equality and diversity
- Whistleblowing Policy
- Supplier Code of Conduct
- Policy for follow-up and external control

Overview of supplements to the above policies:

- Appendix A: ESG Process
- Appendix B: Systematic work environment management
- Appendix C: Guidelines for the whistleblower service
- Appendix D: Routine description for calculation and reporting of climate footprint
- Appendix E: Procedure description for control of subcontractors
- Appendix F: Gift log

2 Internal Code of Conduct

2.1 BACKGROUND AND PURPOSE

In Reledo's operations, all employees must act responsibly and ethically. This policy and associated guidelines provide information and guidance on how employees should act with regard to business ethics issues. In this context, the employee must also take into account that the behaviour they exhibit outside working hours may affect Reledo and its subsidiaries. This must also be taken into account when using social media. At Reledo, we have a starting point in our operations that follow the ten principles of the UN Global Compact, which aim to accelerate sustainability work and contribute to a better world. Starting from this means that we in the business must act responsibly and that we have a principle-based approach when we do business.

2.2 HUMAN RIGHTS

We at Reledo support and respect the internationally proclaimed human rights and we make sure that we are not complicit in any form of violation of these. Respect for human rights is absolutely crucial for us to be able to conduct our business in a sustainable way. We continuously identify risks and manage human rights impacts throughout the organization.

2.3 ANTI-CORRUPTION

Reledo does not tolerate any form or expression of corruption. Corruption is a crime that can result in a fine/imprisonment and is defined as "... to use his position to gain an undue advantage for his own benefit or for the benefit of others.'

Employees may not give, promise, offer, request or receive remuneration or benefits that are contrary to applicable legislation, good business practice or that may affect, or are perceived to affect, the objectivity of decisions and cannot be fully transparently accounted for. All handling of gifts, hospitality and other benefits shall be characterized by openness, moderation and responsibility. An employee may never receive money or any form of commission or "kick-back", regardless of the amount. Employees may also not accept gifts, trips or invitations ("Gifts") with an aggregate value exceeding SEK 300 from any one and the same counterparty. However, employees can always choose to pay themselves for e.g. a trip, conference or invitation. All Gifts received shall be reported and compiled in a Gift Log (see Appendix E) and given to the CEO of the company in which the employee operates. If Gifts from one and the same counterparty exceed SEK300 for the employee, these must be put into a pot that is raffled off among the staff of the company at the end of the year. Regarding representation, the employee can, on behalf of Reledo, offer e.g. customers and suppliers a meal that costs a maximum of SEK 300. In the case of any representations that exceed the above, it must be anchored through the so-called "grandfather's/grandmother's principle".

Internal and external representations shall be characterised by moderation, express customary hospitality and be included as a natural part of initiating and developing collaborations that are important for the business. Reledo has a restrictive view of the use of alcohol in

connection with internal and external representation. During study visits, conferences, seminars or the like, we only participate when the work content is work-related and is deemed to be beneficial to our business.

There may also be a risk of corruption when other persons or companies act on behalf of Reledo. Employees must therefore take special control and precautionary measures before and during cooperation with subcontractors, agents, partners and other intermediaries.

All subsidiaries of Reledo must carry out risk analyses on a regular basis with regard to the company's corruption risks. This work includes identifying the risks that the company faces and where in the organization they are located, analyzing what the consequences will be if any of the identified risks were to occur and if there are deficiencies in existing management of identified risks. Based on the analysis, preventive measures will be designed. The risk analysis should be reviewed annually or as necessary.

2.4 COMPETITION

Employees may not participate in any form of agreement, contact or action with the purpose or effect of preventing, restricting or distorting competition. Employees must handle contacts with competitors with respect and caution and in a way that ensures good business ethics and compliance with competition rules. An employee who is unsure about general or specific competition rules is obliged to find out what applies.

2.5 WORK ENVIRONMENT

Respect for all people is something that should permeate Reledo, and our relationships are thus completely free from discrimination, victimization and harassment. All employees should feel appreciated, community and security. It is the responsibility of every employee to contribute to such an environment. More detailed information about the Work Environment can be found in Reledo's *Work Environment Policy*.

Reledo shall uphold freedom of association and respect the right to collective bargaining. This means that everyone has the right to belong to and form organizations without consequences. All employees have the right to join or establish unions at their own request without external interference.

2.6 MARKETING

Employees must present Reledo's products and services in a correct and fair manner. All marketing should be designed in a responsible, relevant and truthful way. Marketing must be done in accordance with applicable rules, good marketing practice and legislation. We have rules in place that relate to personal and data protection (mainly GDPR).

2.7 DRUGS AND ALCOHOL

Employees must not be under the influence of drugs or alcohol, or affected by the consequential effects of intoxication, during the time intended for work. Drugs also refer to medicines for other than medical use and doping substances. It is also not accepted to come to work under the influence as a result of intoxication the day before. It is the immediate manager who decides whether an employee is sober and able to work. Violation will result in the employee being sent home. Employees in substance abuse must receive relevant help as a matter of urgency.

2.8 CONFLICTS OF INTEREST

Employees must avoid contexts where their own, relatives' or friends' interests may risk conflicting with what is best for Reledo. Private interests and external activities must not influence or be perceived to influence an employee's judgment or actions when performing their work for Reledo.

When a risk of conflict of interest exists, or can be suspected, the immediate manager must be informed and responsible for taking appropriate measures. If a conflict of interest is suspected, the employee concerned may not be involved in or make decisions in the matter on behalf of Reledo.

2.9 HANDLING OF INFORMATION AND PERSONAL DATA

Information about Reledo's operations should always be handled with good judgment and care. Reledo's processing of personal data shall take into account the protection of personal integrity and in accordance with applicable law. All forms of personal data processing must comply with relevant and necessary legislation and regulations.

A cyber security risk analysis shall be carried out to identify any threats to information security in the business and to assess the risk of damage that the threat would entail. The analysis must also include information about the likelihood of the threat materialising. This should be done in order to both work with measures for risk minimisation and to ensure information security at the company.

2.10 TAX, MONEY LAUNDERING AND OTHER ECONOMIC CRIME

Employees at Reledo must comply with applicable laws and regulations regarding tax and anti-money laundering measures. Employees must not accept any activities that could facilitate tax violations and lead to money laundering. Reledo shall keep accurate accounts of financial transactions and counteract undeclared work, the influence of illegal activities and other economic crime.

2.11 TARGET AUDIENCE

The Code of Conduct applies to all employees in the Reledo Group.

2.12 ROLES AND RESPONSIBILITIES

The Board of Directors of Reledo establishes the Code of Conduct, and the CEO has the ultimate responsibility for its implementation and compliance. Managers should lead by example and are expected to discuss the content of the Code with their employees and create a work environment where employees feel safe to raise issues related to the Code.

It is the responsibility of all employees to act on the basis of the Code of Conduct and seek support on its application from their immediate manager. Reledo does not accept any negative consequences for employees who, in good faith, report suspected violations.

If any form of doubt arises in connection with a transaction or assignment that may be suspected of affecting or threatening Reledo's business ethics, the precautionary principle shall be applied and in the first place, the CEO of the company in which the employee is active and, secondarily, the CEO of Reledo and thirdly, the Chairman of the Board of Directors of Reledo.

It is the CEO's responsibility to ensure and ensure the quality of the work. The companies' management teams have a special responsibility to ensure that Reledo's business ethics maintain a high and consistent level and that they are complied with and developed in a good way throughout the Group.

All new employees must have training in the Code of Conduct and sign it no later than 3 months after employment and thereafter refresher training every two years. It is the CEO's responsibility to ensure that this is done

2.13 OBSERVANCE

Actions that violate the Code of Conduct may lead to disciplinary action for the individual employee, including dismissal.

In the event of (i) suspicion or (ii) actual violation of the Code of Conduct, the CEO of the company in which the employee operates shall primarily be consulted. If this is not possible, the CEO of Reledo in the first instance, and the Chairman of the Board of Directors of Reledo in the second instance, shall be consulted. If the employee does not feel it is appropriate to go through these routes, they can also use Reledo's whistleblower function

– See *Whistleblowing Policy* and *Whistleblowing Guidelines*. An employee, regardless of position, who acts on his or her own in case of doubt can be held personally liable for negligence.

3 Sustainability policy

3.1 BACKGROUND AND PURPOSE

Reledo shall conduct a long-term sustainable and competitive business with responsibility for environmental, social and economic aspects towards customers, employees, owners and society at large. Sustainability should be a fundamental and guiding principle throughout the company. Sustainability work is followed up on an ongoing basis through ESG reporting. The purpose of our sustainability policy is to establish guidelines for how sustainability work in all our companies should be conducted. Our work will contribute to sustainable development. We intend to do this by systematically reporting, reporting, following up and reducing our climate impact.

3.1.1 STARTING POINT

For us at Reledo, it is important that all our companies comply with the regulations set out in Appendix A and B. This is to create common procedures and procedures for taking responsibility for our operations and for sustainable development. Appendix A and B also contain reporting guidelines that support our internal fulfilment of our common objectives.

At Reledo, we have decided to prioritise five of the seventeen global goals set by the UN for sustainable development. Exceeding the planet's resources comes with great risks for our future, which is why we set goals in our operations to reduce these risks. The goals are 5, 6, 12, 13 and 16, and we see a clear link between them and our business, which also means that we can make a difference in these issues.



3.2 POLICY

3.2.1 ENVIRONMENTAL RESPONSIBILITY AND ECOLOGICAL SUSTAINABILITY (E)

We will identify environmental and climate risks continuously in the organization, at customer assignments and in supply chains to understand how and where we can improve and develop our sustainability work.

We shall work to take environmental responsibility by conducting our business in such a way that the earth and its natural resources are not adversely affected over time. We aim for our services to contribute to reduced climate and environmental impact and to increased resource efficiency, and we will inform and help our customers in their environmental work.

We will continuously work to reduce our consumption of energy and strive to use energy sources that are as efficient and have as low an environmental impact as possible. We intend to recycle and sort waste. We must have strict procedures for taking care of all environmentally hazardous waste.

We will constantly strive to reduce our use of consumables and to produce a smaller amount of waste, and where possible, contribute to a circular economy and the reuse of resources. We must choose means of transport and travel with regard to the environmental impact.

We will live up to binding requirements and contribute to achieving Sweden's national environmental goals and the UN's global sustainability goals in Agenda 2030. We will measure and report our own footprint in accordance with *the GHG Protocol* (see Appendix B) to create a long-term positive footprint and to achieve our vision of being climate neutral by 2050.

3.2.2 SOCIAL RESPONSIBILITY AND COMMITMENT (S)

Taking responsibility for society's social sustainability is about working for an equal and equal society where people live a good life with good health and where everyone's equal value is a matter of course. We at Reledo shall conduct business as a good corporate citizen. We must take our fellow human beings into account - whether they are employees, customers, partners or in other ways affected by our company. In this work, we are guided by the following guidelines:

We shall offer a pleasant and developing work environment for all our employees regardless of gender, ethnicity, religion, sexual orientation, disability and age. We must work for zero tolerance for all forms of discrimination and special treatment.

We shall create conditions for our employees to feel good, and take health-promoting aspects into account in our daily working methods and in the event of changes in the organization. We will offer safe workplaces - in our own premises and at the customer's premises.

We shall offer our employees a work situation that enables balance in life and promotes personal and professional development.

We will work to have committed employees who feel involved. We believe in short decision-making paths and encourage our own initiatives.

We will identify social risks in the organization, in customer assignments and in the supply chain to understand how and where we can improve and develop our sustainability work.

3.2.3 FINANCIAL AND BUSINESS ETHICS RESPONSIBILITY (G)

Taking responsibility for society's economic sustainability is about using and nurturing resources to create long-term sustainable value. For Reledo, this means securing long-term economic growth with sound corporate governance and conducting responsible operations with balanced finances. In this work, we are guided by the following guidelines:

We shall value honesty, openness, responsibility, transparency and ethics in all business relationships. We will keep promises and treat both employees, customers, partners and other stakeholders with respect.

We will work to distance ourselves from all forms of bribery, bribery and corruption. Our *internal Code of Conduct* contains clear rules regarding gifts and hospitality.

We shall not be complicit in money laundering, extortion and embezzlement or financial crime.

We shall comply with laws and other requirements related to health and safety. We handle our customers' materials and information responsibly and safely.

We shall work for healthy competition and observe good marketing practice. Our information to customers shall be clear and never deliberately misleading.

3.3 TARGET AUDIENCE

The sustainability policy covers all of Reledo's employees. The policy also applies to our subcontractors, suppliers and other partners.

3.4 ROLES AND RESPONSIBILITIES

Each manager is responsible for ensuring that employees understand and comply with the content of this policy, and all employees have a responsibility to comply with this policy.

3.5 OBSERVANCE

Everyone covered by the policy has an obligation to report any violations.

At Reledo, we will strive to strengthen knowledge and awareness of sustainability in all our companies. We will do this through various types of training opportunities for our employees regarding sustainability issues.

The sustainability policy will be communicated internally and available on our intranets. We are committed to documenting the work with our goals and updating the progress report annually to see the outcome of our sustainability work. The progress report is advantageously updated in connection with the annual review of this policy.

4 Work environment policy

4.1 BACKGROUND AND PURPOSE

Reledo shall be an attractive employer that both retains and attracts competent employees. Our values: curiosity, respect and cooperation, form the basis of our personnel work. Through continuous improvements, we want to create a safe, stimulating, healthy and pleasant work environment. Working methods, systems and routines must be adapted so that they support and develop employees.

The purpose of this policy is to maintain a sustainable working life for all our employees. The work environment must be safe and secure so that there are conditions for both professional and individual development. The policy provides guidance on how to ensure that employees maintain trust in Reledo. The goal is for all employees to be involved in the work environment management.

4.1.1 STARTING POINT

Our work environment policy is based on the UN Global Compact and its ten principles ([The Ten Principles – Global Compact Network Sweden](#)). It has been drawn up in accordance with the Work Environment Act (1977:1160) and from Appendix A and B.

4.2 POLICY

4.2.1 HUMAN RIGHTS

At Reledo, we will work to respect internationally proclaimed human rights. This means that we must carry out systematic work to ensure that human rights are not violated in the value chain. In accordance with the UN Global Compact, we work for zero tolerance for all forms of forced labour and child labour in our workplaces. Respect for human rights must be fundamental in all our companies.

4.2.2 OUR WORK ENVIRONMENT

We at Reledo must have respect for all people and our relationships and employment are free from discrimination, victimization and harassment. By maintaining a friendly working climate, all employees should feel appreciated, community, and security. We work for personal responsibility, personal development and skills development for all employees. This work should be central to the annual development discussions.

Our work environment management shall be an integral part of the business through active cooperation between managers and employees and through continuous improvements. In our *systematic work environment management* (see appendix C), we have clear guidelines for how we work for a sustainable and safe work environment.

4.2.3 HEALTH AND SAFETY

At Reledo, we will work for a zero vision regarding work-related accidents, injuries and incidents. Workplaces must be characterised by a high level of safety. We shall carry out continuous risk analyses regarding our work environment in order to identify and remedy the risks that may arise in the business. We will address workplace-related risks systematically, continuously monitor injuries in the workplace and document analyses and measures. To minimize the risk of work-related injuries, we must work to ensure that this is done in a correct way. Occupational injuries must be investigated and risks in the business must be investigated and remedied.

We will also work with activities that promote the health of our employees. Abuse in various forms, such as alcohol and drug abuse, is a health problem in itself and a risk in the workplace. We will always act to help employees who are in addiction. We will also be responsible for providing occupational health care and having relevant insurances. More information about our guidelines and procedures for work environment management can be found in our *Systematic work environment management (appendix B)*.

4.3 TARGET AUDIENCE

The Code of Conduct applies to all employees in the Reledo Group. The policy also applies to our sub-consultants, suppliers and other partners

4.4 ROLES AND RESPONSIBILITIES

Each manager is responsible for ensuring that employees understand and comply with the content of this policy, and all employees have a responsibility to comply with this policy.

4.5 OBSERVANCE

The work environment at all companies must be evaluated continuously and reported to Reledo. Monitoring and control of compliance with applicable work environment legislation, as well as other requirements from stakeholders, takes place continuously. Monitoring and development of the work environment shall be a natural part of all Reledo's companies.

In the event of any policy violations, everyone covered by the policy has an obligation to report them. This is primarily done to the immediate manager. In cases where it is not applicable to report to the immediate manager, the violation is reported to the CEO of the company in question or to the CEO of Reledo.

The *Whistleblowing Policy* describes how we go about reporting any policy violations anonymously. Please also read the *Guidelines for whistleblowing* in appendix C.

5 Policy for equality and diversity

5.1 BACKGROUND AND PURPOSE

Our equality and diversity policy is based on our fundamental values in matters of equality and diversity. All forms of discrimination and harassment are unacceptable. The policy aims to ensure that the entire company is permeated by our fundamental approach to the equal value of all people and the right to equal treatment. The goal is to ensure a good and safe working environment for all employees.

Discrimination means any type of discrimination that disadvantages individuals and/or groups' freedom of action and choice and where personal integrity is violated. Discrimination and harassment based on any of the seven grounds for discrimination; Gender, gender identity, ethnicity, sexual orientation (includes all sexual identities within LGBTQIA), religion and belief, disability or age, is an abuse of power that we do not accept.

5.1.1 STARTING POINT

The Discrimination Act (2008:567) defines discrimination as someone being disadvantaged by being treated worse than someone else is, has been treated or would have been treated in the same situation if the disadvantage is related to one of the grounds of discrimination mentioned above. Harassment is defined as behaviour that violates someone's dignity and is related to one of the grounds for discrimination. Sexual harassment is defined as conduct of a sexual nature that violates someone's dignity.

It is always the victim who decides what behavior is acceptable and what is considered unwelcome. If the person has not given their consent to the behavior, it can lead to legal consequences.

5.2 POLICY

5.2.1 HANDLING OF CASES OF DISCRIMINATION, HARASSMENT AND SEXUAL HARASSMENT

A report of discrimination, harassment, sexual harassment or victimisation must be submitted to the CEO or HR manager of the company in which the employee operates. The employer has an obligation to investigate and take action when a report has been made. An employer who does not investigate and take urgent measures to stop this may be liable to pay damages to the victim. The person who receives a report is responsible for ensuring that the processing of the report is done with the utmost respect for the victim. The investigation should begin with a conversation with the exposed employee. To create security, it is good that all employees know what the consequences of discrimination and various forms of harassment can be. For those who harass, violate or discriminate against them, there may be labour law consequences such as a warning and possible dismissal or dismissal. If the report can be considered to be the subject of a criminal investigation, the case must be forwarded to the police authority.

Anyone who wants to point out or report discrimination, violations and harassment should be able to do so without having to worry about negative consequences or being subjected to reprisals.

If the employee does not feel that it is appropriate to go through the above-mentioned route regarding reporting, they can also use Reledo's whistleblower function – See *Policy for Whistleblowing* and *Guidelines for Whistleblowing*.

5.2.2 OUR EQUALITY AND DIVERSITY GOALS

At Reledo, all people, regardless of gender, gender identity, ethnicity, sexual orientation, religion and belief, disability or age, shall be given the same opportunities regarding employment, education, development and promotion within the framework of their knowledge, will and/or ability. We shall strive for equality and diversity in all areas and positions within the company.

Salary development and other financial compensation (such as commission and bonus) should not be affected by gender, age, religion, ethnicity, sexual orientation, disability, but instead be related to performance and work tasks. We must have working conditions that are suitable for both women and men. We must make it easier for both women and men to combine gainful employment with parenthood. A positive attitude towards taking parental leave is important. We must promote an equal parental culture where men and women share parental leave equally. Our employees should be able to adapt their individual career plans based on stage in life.

5.3 TARGET AUDIENCE

The policy applies to all employees in the Reledo Group.

5.4 ROLES AND RESPONSIBILITIES

The Board of Directors of Reledo establishes the company's overall equality and diversity policy, and the CEO has the ultimate responsibility for ensuring that the policy is followed.

Reledo will work with active measures to counteract discrimination, harassment, sexual harassment and victimisation to promote equal rights and opportunities within the company, regardless of the grounds for discrimination. The work with active measures will be done in different areas; working conditions, recruitment, promotion, education/other skills development, parental leave, salary setting and other financial rewards.

5.5 OBSERVANCE

Actions that violate the policy may result in disciplinary action for the individual employee, including dismissal.

In the event of a breach of the policy, the CEO of the company in which the employee works shall primarily be consulted. If this is not possible, the CEO of Reledo in the first instance, and the Chairman of the Board of Directors of Reledo in the second instance, shall

be consulted. If the employee does not feel that it is appropriate to go through these routes, they can also use Reledo's whistleblower function – See *Policy for Whistleblowing*.

6 Whistleblowing Policy

6.1 BACKGROUND AND PURPOSE

This policy complies with the Act on the Protection of Persons Who Report Misconduct (2021:890) and applies to all whistleblowing and reporting in work-related contexts. At Reledo, we strive to have an open business climate, with high business ethics and where there is an open dialogue in the company about problems that arise in the business. Our employees, customers and suppliers are our most important sources of insight into any shortcomings that may need to be corrected. Anyone who suspects an irregularity, which is contrary to Reledo's values, code of conduct or law, should have the opportunity to speak without fear of reprisals. As an employee of one of Reledo's companies, you can choose to provide your information anonymously via Reledo's whistleblower service **Izefy**, which offers a secure channel for communication.

With this whistleblower policy, Reledo indicates how employees who have reason to report serious misconduct can act without violating the duty of loyalty in the employment contract and suffering labour law measures or other negative consequences. All revelations of serious misconduct must be handled fairly and correctly. Read more about our guidelines for the whistleblower service in Appendix C.

6.2 POLICY

When a whistleblower reports misconduct, we at Reledo's management are committed to protecting the whistleblower from any negative consequences of reporting the misconduct. On the other hand, a person who, through reporting or gathering information, commits a crime is not protected against reprisals. This is in accordance with the Act on the Protection of Persons Who Report Misconduct (2021:890).

Bullying, harassment, unfair treatment, punishment or discrimination as a result of a report is treated as a violation of our disciplinary procedures. We shall also examine the report thoroughly and objectively. If irregularities occur, we will do what is necessary to remedy them. We shall keep the whistleblower informed of the progress and outcome, where applicable (e.g. provided that the whistleblower is not anonymous). We undertake not to involve persons who are the subject of the report in the investigation of a whistleblower case.

Read more about guidelines for how, when and why the whistleblower service is used in the document *Guidelines for the whistleblower service* in Appendix C.

6.3 TARGET AUDIENCE

The policy applies to all employees, regardless of their form of employment, as well as any sub-consultants.

6.4 ROLES AND RESPONSIBILITIES

The CEO, and by extension the board, are responsible for ensuring that this policy is implemented and followed, and all employees have a responsibility to report if something is not right.

7 Supplier Code of Conduct

7.1 BACKGROUND AND PURPOSE

We strive to create positive relationships between suppliers and buyers. Relations must be based on openness, trust and transparency. We have a responsibility to support and create sustainable development in the business community and we believe that mishandling ESG aspects in the supply chain can lead to risks and negative effects. This policy aims to guide how suppliers should act regarding human rights, working methods, work environment and corruption. Reledo's Code of Conduct provides suppliers with a basis and guidelines for decisions and how they should act. In Reledo's operations, everyone is expected to act ethically and responsibly in order to work preventively and together for sustainable development.

7.1.1 STARTING POINT

The Code of Conduct is based on the UN Global Compact and its ten principles. It is also in line with the UN Convention on the Rights of the Child and the UN Declaration of Human Rights. Suppliers are always expected to comply with the law that applies in the country where the supplier operates and always be up to date on existing and future legislation regarding supply chain control.

7.2 POLICY

Reledo's suppliers must comply with and apply this Code of Conduct in all the supplier's operations, it must also be communicated and implemented at their own suppliers. Upon acceptance of the Code of Conduct, the Supplier consents to inspections being carried out to ensure compliance with the Code of Conduct.

7.2.1 BUSINESS ETHICS

In the same way as in the internal Code of Conduct, employees and suppliers may not give, promise, offer, request or receive remuneration or benefits that are contrary to applicable legislation, good business practice or that may affect or be perceived to affect the objectivity of decisions and cannot be fully transparently reported.

Reledo's suppliers must have zero tolerance for all forms of corruption, including extortion and bribery. There must be procedures in place to prevent these types of irregularities.

The supplier shall act in a manner that avoids conflicts of interest and is managed in a clear and transparent manner. This also includes that sensitive or confidential information regarding Reledo may not be disclosed.

Reledo has zero tolerance for all forms of forced labour and child labour. The supplier must also ensure that an employment contract is signed with each employee before the employment starts. The agreement must contain terms of employment such as job description, salary, working hours and notice period, etc. Employees must also have the right to collective bargaining.

The provider shall promote equal opportunities for everyone regardless of gender, sexual orientation, ethnicity, transgender identity or expression, belief, disability or age. Reledo also has zero tolerance for offensive or humiliating behavior and statements. The work environment must be free from hostile, violent and ostracism behaviour.

7.2.2 HUMAN RIGHTS

Reledo's suppliers must respect internationally recognised human rights. It is the responsibility of the supplier to ensure that they do not violate human rights through their activities or business relationships.

7.2.3 HEALTH AND SAFETY

Reledo's suppliers must provide a safe working environment and have preventive measures in place to minimize the risk of injuries and health risks. The supplier must also ensure that employees have relevant safety training for their work.

Before starting the project, the supplier must conduct a risk analysis to identify the risks that exist in the various work steps and how these should be managed for preventive purposes. Everyone in the workplace must have access to this information and any risks that the work may involve. Employees of the company and in projects must also be informed that they have the right to remove themselves from imminent danger without seeking permission to do so.

Relevant protective equipment must be provided to those who carry out work. The supplier must also have procedures for reporting any accidents and occupational injuries in order to improve its approach.

7.2.4 ENVIRONMENTAL IMPACT

Reledo's suppliers must use resources efficiently. This means that suppliers must take environmental aspects into account in production and distribution. The supplier must also actively work to reduce the company's emissions and make the use of resources for water and energy more efficient. There must also be procedures for working to minimize environmental impact. The supplier must also map the supply chain in terms of ESG risk, potential for influence and significance for the company's value creation.

7.2.5 REPORTING AND COMMUNICATION

Reledo's suppliers must support the precautionary principle with regard to environmental risks, take initiatives to promote greater environmental responsibility and encourage the development and dissemination of environmentally friendly technologies.

Sustainability-related KPIs must be presented to Reledo upon request.

There shall be a clear division of responsibilities and written policies and procedures to ensure that the implementation of this Code of Conduct takes place and that it is complied with. This includes having procedures in place to check that any subcontractors also comply with the requirements of the Code of Conduct.

The supplier must inform employees about the Code of Conduct and what responsibilities it entails for the person's role. There will also be a whistleblower channel and procedures for how employees can communicate complaints or information anonymously. No penalties shall be required from the persons who report in the system.

7.3 TARGET AUDIENCE

This policy applies to:

- Subcontractors to Reledo
- Suppliers to Reledo
- Subcontractors to Reledo's suppliers
- Employees under the supervision of the supplier/subcontractor/subcontractor

7.4 ROLES AND RESPONSIBILITIES

The entire process regarding the implementation of policy, strategy and operational management around the process as well as responsibility for providing appropriate expertise shall be taken responsibility for by the CEO. All employees have a responsibility to comply with the Code of Conduct and to seek support on its application from their immediate manager in the event of questions or ambiguities.

7.5 OBSERVANCE

To assess whether the supplier meets the conditions of the Code of Conduct, a self-assessment is carried out every year. Reledo has the right to request documentation from the supplier in order to evaluate compliance with the Code of Conduct. Reledo also has the right to carry out physical inspections at the supplier's premises if necessary. Read more about this in our policy for follow-up and external control. Actions that violate the Code of Conduct may result in disciplinary action for the supplier. If a supplier deviates from the terms of the Code of Conduct, a joint action plan for improvement work is drawn up. If improvement work is not an option, Reledo may choose to terminate the collaboration with the supplier.

8 Policy for follow-up and external control

8.1 BACKGROUND AND PURPOSE

The purpose of this policy is to provide guidance in the appointment of an external auditor for the annual follow-up and control of suppliers. By following up and increasing control in the supply chain, we can both increase safety for employees and identify and minimize risks in the business. This policy applies to us at Reledo as the parent company.

8.1.1 STARTING POINT

At Reledo, we follow ISO 28000 as standards for the work environment, environment and management systems in the supply chain, this means that all our manufacturers and suppliers must follow the same standards. We set requirements for high quality when it comes to social compliance in the supply chain and ISO 28000 sets requirements for safety management systems in the supply chain. The standards aim to protect the fundamental rights of employees and to minimize security risks in the supply chain.

8.2 POLICY

At Reledo, we are committed to following up and checking that the Code of Conduct for suppliers is followed.

When a supplier is registered at a workplace, the company must be checked against data from external sources such as credit institutions. Subcontractors must be checked to ensure that they are registered for F-tax, pay employer's contributions and have an acceptable credit rating.

Reledo also requests that all suppliers sign the supplier code. Reledo will conduct STO compliance with the help of a qualified external reviewer. Review protocols will be established at the time of the inspection and remarks will be written down to take appropriate action to minimise risks in the supply chain.

We will follow up that suppliers act in accordance with ISO and SA standards linked to the work environment, environment and management systems in the supply chain. The follow-up takes place via inspections and random checks on suppliers, we at Reledo are responsible for the costs of inspections. See routines for follow-up and external control in Appendix E.