



Code of conduct for Vasakronan employees



Our vision to “create future-proof cities for everyone, where people and companies thrive” is based on ethical, responsible action. Simply put – sustainability.



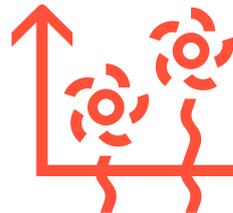
This code of conduct summarises our approach to sustainability as a business partner, employer and societal actor. The code of conduct is based on the ten principles of the UN Global Compact concerning human rights, labour, the environment and anti-corruption as well as our five values:

- **Openness binds us together**
- **Enthusiasm drives us forward**
- **We get things done**
- **Fair and honest**
- **A holistic approach**

The Code of Conduct, how and with whom do we follow up?

The Code of Conduct applies to all Vasakronan employees and it is each individual's responsibility to ensure that we understand and act in accordance with it. If anyone breaks with the Code of Conduct or any of our guidelines or policies, it should be reported and followed up with your immediate manager. You can also turn to our Compliance Officer or someone else in the Management Group, or report the issue to our external whistle-blower service, Interaktiv Säkerhet. Customers, suppliers and other stakeholders can turn to Interaktiv Säkerhet to make a report. You can find more information about how to make a report at [vasakronan.se](https://www.vasakronan.se).

Financial responsibility



How we earn our money

Our overriding mandate is to generate a high, risk-weighted, long-term return from Swedish properties, though never at the expense of the environment or people. To accomplish our assignment, we must create value in the business. We do this by responsibly managing our properties from a long-term perspective, signing profitable rental agreements, ensuring that our finances are stable and through structured procurement efforts. To provide an accurate image of our operations, we report and communicate our financial position in accordance with applicable laws and regulations.

The principles governing tax compliance and the tax Vasakronan pays are transparently described for our stakeholders.

You can find more information about this in our Tax Policy.

Transparent operating methods

We only engage in business operations that follow national laws, established agreements and are in line with our code of conduct. We take no business decisions based on personal interest or private relationships. We do not tolerate any form of bribes, hidden commissions, or other dubious conditions, whether in our own operations or those of our customers, suppliers, contractors or third parties who work on our behalf.

Moderation and good judgement characterise our view of hospitality and gifts, and we neither offer nor accept anything that could undermine our respectability and professionalism. Obviously, our hospitality always has a natural connection with our operations.

We support free competition and we do not enter any agreements that conflict with competition law.

You can find more information about this in our Anti-Corruption Policy.

Information and communication

Vasakronan AB (publ) is an unlisted company. However, because financing operations is partially through the capital market using financial instruments such as bonds, registered on the Nasdaq OMX Nordic Exchange (the Stockholm Stock Exchange), on the Oslo Stock Exchange and on Euronext Dublin, we follow rules regarding notification, stock and clearing laws and other applicable laws and ordinances.

This means that Vasakronan provides relevant, reliable, correct and current information to all stakeholders.

Information deemed to affect the valuation of the company is to be published without delay.

You can find more information about this in our Communication Policy.

The collection of personal data

Provisions in the General Data Protection Regulation, or GDPR, regulate how personal data is processed. If the information you need in your work contains personal data, it should only be saved as long as needed for your task. All types of information that can identify a person are classified as personal data, such as the person's name and e-mail address. Your Vasakronan e-mail can only be used for work-related communication.

You can find more information about this in our Data Protection Policy.

Environmental responsibility



Environmental impact

Properties impact the environment throughout their lifecycle, from planning, construction and management to renovation and demolition. Our environmental initiatives are based on the precautionary principle and the company's environmental management system, which is ISO 14001 compliant.

The company's processes have been developed to manage environmental aspects in every stage of a property's lifecycle. To ensure compliance with the environmental management system, internal and external audits are conducted every year.

It is our ambition to always build, develop and manage sustainably and with the entire lifecycle in mind. To the greatest extent possible, we only use renewable, recycled, or reused resources. We also actively work with our tenants to help them reduce their environmental impact as well. Moreover, we collaborate with our suppliers and different organisations to develop new ideas and achieve sustainable solutions. We set environmental requirements for our suppliers and prioritise those who meet them.

You can find more information about this in our Environmental Policy.



Social responsibility

Responsibility for the people we affect

We take responsibility for the people who are affected by our operations. This means both the people who work on our account, whether at Vasakronan or at our suppliers, and the people who spend time in and around our properties. This means that all of our properties and their surroundings are to be safe, healthy and accessible for all.

The basic human rights of those who work on our behalf must be met and they must also be provided with a safe work environment that is free from all forms of discrimination. You can find more information about this in our Code of Conduct for Suppliers

Labour and work environment

Vasakronan supports comfortable employment with regular working hours and the right to join labour unions as one chooses. Our employees have the right to enjoy their work and a work environment that is safe, healthy and free from negative stress. In line with this, we offer all employees skills development, health and wellness care as well as private health insurance, rehabilitation and paid leave in the case of long-term illness. We value open communication where everyone has the right to receive and an obligation to look up information. Neither Vasakronan nor any of our partners accept child labour in any context.

Diversity and equal treatment

We believe that diverse companies are more profitable and successful. That is why we work actively with diversity and equality issues. Everyone should always have equal opportunity in terms of employment, training, advancement and development at the company.

Everyone should have the right to equal pay for equal work and equal terms of employment should apply for everyone.

Every employee should have conditions that are compatible with parenthood.

Treatment

We are professional, fair and honest, and we treat our colleagues and other people with respect and goodwill. We keep our promises, deliver in time and provide updates regarding delays. We are loyal to Vasakronan and do not speak poorly of each other. As employees, we understand that our behaviour and what we communicate in our surroundings, both at work and in private, jointly create an image of Vasakronan. We dress appropriately for the work situation we are in.

Societal engagement



Our contribution to positive societal development

We want to help create conditions for cities that support well-being in society. We do this by engaging in research, different networks, organisations and initiatives at the national level and in the regions where we operate. Our

engagement and our contributions are long-term in nature, lead to a better environment and a better society, and engage our employees. A group we are particularly concerned about is the next generation in the city – young people. That is why we work with municipalities, selected contractors, driving spirits and organisations that prioritise young people.

The UN sustainable development goals



The images in colour show those UN Sustainable Development Goals deemed significant to Vasakronan's operations.

The UN Global Compact principles

Human rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: Businesses should uphold the elimination of forced and compulsory labour.

Principle 5: Businesses should uphold the effective abolition of child labour.

Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.



Vasakronan is Sweden's largest property company and is owned in equal shares by the First, Second, Third and Fourth Swedish national pension funds. We own, manage and develop centrally located office and retail properties in Stockholm, Uppsala, Gothenburg and Malmö.

It is our goal to be seen as a good societal actor, a role model in the Swedish business community and to be a good employer for all of our employees.

Our vision is to create future-proof cities for everyone, where people and companies can thrive. That is why we run our entire business in a sustainable way.