

Code of Conduct

For Wästbygg Group's suppliers and
other business partners

**WÄSTBYGG
GROUP**

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Purpose of the Code of Conduct

At Wästbygg Group, we strive to work in a way that promotes health and wellbeing and combats financial misconduct and the exploitation of people and the environment, and we expect our suppliers and business partners to do the same. This Code of Conduct sets out the basic values and guidelines that we expect everyone who performs work for Wästbygg Group to adhere to and comply with.



1. Introduction to the Code of Conduct

1.2 Scope of the Code of Conduct

The common guidelines and values that Wästbygg Group adheres to apply not only to employees and others who work at Wästbygg Group, but also to those who perform work on the Wästbygg Groups behalf. This Code of Conduct sets out the requirements that we impose on our business partners. The Code of Conduct is based on Wästbygg Groups internal Code of Conduct and on international conventions and standards such as the UN Global Compact and Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core ILO Conventions. The Code of Conduct applies to Wästbygg Group's business partners and suppliers, including their group companies, employees and agents ('Wästbygg Groups Business Partners'). Wästbygg Groups Business Partners' employees include full-time and part-time employees, consultants, interns, temporary employees, migrant workers and board members.

Business Partners of the Wästbygg Group are responsible for ensuring that any subcontractors engaged to perform work on Wästbygg Groups behalf comply with the guidelines and values set out in this Code of Conduct.

2. General requirements for business partners

2.1 Legal requirements

Wästbygg Groups Business Partners must know and comply with relevant laws, regulations and rules. If laws, regulations or rules contain stricter requirements than those in this Code of Conduct or vice versa, Wästbygg Groups Business Partners must comply with the stricter of the requirements.

2.2 Wästbygg Group's requirements and expectations

Each section of this Code of Conduct comprises two parts: requirements and objectives. Wästbygg Groups Business Partners must, in addition to meeting legal requirements, meet all the requirements imposed by Wästbygg Group under each section. In addition, Wästbygg Groups Business Partners are expected to work actively to meet the objectives stated. Wästbygg Groups Business Partners must have procedures in place to ensure that (i) legal requirements and the requirements in this Code of Conduct are complied with and that (ii) they work continuously and actively to meet the Code of Conduct's objectives.

In addition to the specific requirements and objectives stated in the Code of Conduct, we also expect Wästbygg Groups Business Partners to work actively in other respects to promote economic, social and ecological sustainability and development. We also expect Wästbygg Groups Business Partners to conduct long-term efforts to reduce their operations' potential negative impact on such sustainability.

2.3 Transparency and continuous improvement

Wästbygg Group realises that implementing the requirements and objectives in this Code of Conduct cannot be achieved overnight. This work is part of a long-term, dynamic process. However, we expect Wästbygg Groups Business Partners to be open and transparent regarding their possibility to meet the requirements and objectives set out in the Code of Conduct. We expect to have an open dialogue regarding any shortcomings and potential areas for development identified in relation to our requirements and objectives, and about any progress made in this regard. Moreover, we expect Wästbygg Groups Business Partners to work proactively to prevent and, if necessary, mitigate the consequences of the shortcomings mentioned above.

3. Working conditions

3.1 Zero tolerance of discrimination

Our requirements

At Wästbygg Group, we value our employees' differences and treat each other with care and respect. We expect Wästbygg Group's Business Partners to do the same. Wästbygg Group's Business Partners must never permit discrimination on grounds of gender, gender identity, age, nationality, ethnicity or ethnic background, religion, sexual orientation or similar personal factors. This means that employees' rights and obligations must not be affected by such personal factors. This, in turn, means that recruitment decisions, terms and conditions of employment, etc. must be based on a person's objective ability to perform the work in question and never on personal factors such as those mentioned above.

Objective

Wästbygg Group's Business Partners are encouraged to promote diversity and inclusion, for instance by offering employment and working conditions irrespective of an individual's personal circumstances and attributes. Wästbygg Gruppen's Business Partners are also encouraged to continuously review their processes for recruitment, promotion, etc. to ensure that they are based on objective criteria.

Moreover, Wästbygg Group's Business Partners are encouraged to be involved in various non-governmental organisations and initiatives aimed at highlighting and preventing societal structures, stereotypical norms and other aspects that form a basis for discrimination.

3.2 Zero tolerance of harassment

Our requirements

For Wästbygg Group, it is important that everyone who works with and for us is treated with respect and that nobody feels unsafe at their workplace. Consequently, Wästbygg Group's Business Partners must provide a workplace with an open climate and never tolerate any instances of discrimination, harassment, oppression or other forms of victimising or demeaning treatment.

Objective

Wästbygg Group's Business Partners are encouraged to address these issues proactively by giving their employees training and information on the importance of an open and inclusive work climate where everyone feels safe. Wästbygg Group's Business Partners are also encouraged to adopt procedures that enable the early detection of harassment or other forms of victimisation, as well as a clear action plan for dealing with any such situations that arise.

3.3 Fair terms and conditions of employment

Our requirements

Wästbygg Group does not tolerate any forms of forced or child labour on the part of Wästbygg Group's Business Partners or others carrying out work for Wästbygg Group. Wästbygg Group's Business Partners must never directly or indirectly limit their employees' freedom of movement, e.g. by confiscating passports or other ID documents. Moreover, Wästbygg Group's Business Partners must not employ anyone who has not yet completed compulsory schooling or is under 15 years of age. Employees over 15 but under 18 years of age may not be given work that could harm their physical or mental health and safety.

Moreover, Wästbygg Group's Business Partners must offer fair working conditions, pay and benefits. Salaries, benefits and leave, e.g. sick leave, parental leave or annual leave, must never be lower than the minimum levels set out under applicable laws, collective agreements or other agreements with trade organisations. If an employee's legal minimum wage is lower than the amount an employee needs to support themselves and their financial dependents, the employee must be offered adequate pay to meet these financial needs. Pay deductions may only be applied if permitted under applicable law or collective agreements.

Objective

Wästbygg Group's Business Partners are expected to prepare policies and risk assessment processes to prevent forced or child labour taking place in their organisation or in any other part of their supply chain. To highlight and proactively work to prevent forced and child labour, Wästbygg Group's Business Partners are encouraged to be involved in various non-governmental organisations and initiatives that address these issues, as well as in other non-governmental organisations that promote employees' rights.

Moreover, Wästbygg Group's Business Partners are encouraged to produce feasible work schedules that prevent quality and safety from being compromised and ensure that employees can perform their work well in the long term. Wästbygg Group's Business Partners are also encouraged to develop and implement pay structures that ensure employees are offered fair remuneration based on their work tasks, experience and expertise.

3.4 Health and safety

Our requirements

Wästbygg Group's Business Partners have a duty to minimise employees' exposure to safety risks during the course of their work. To minimise risk of accidents and incidents, products and work procedures that could pose a safety risk must be clearly identified, adjusted and subject to continuous evaluation, maintenance and inspection. If equipment and/or products cannot be adequately inspected in a way that eliminates any safety risks associated with them, Wästbygg Group's Business Partners must, instead, provide the personal protective equipment needed. Wästbygg Group's Business Partners also have an obligation to train and inform their employees about potential safety risks present in the workplace. Moreover, Wästbygg Group's Business Partners must ensure that they are well prepared to deal with safety incidents and other emergency situations. Wästbygg Group's Business Partners must have adequate procedures in place for dealing with such incidents or emergencies, and employees must receive regular training in applying these procedures. Furthermore, it is Wästbygg Group's Business Partners' responsibility to ensure that all employees have access to clean drinking water, toilets and a place where they can prepare and eat food during their work shifts. In addition, the workplace must be adequately ventilated and insulated and employees must not be subjected to unhealthy temperatures, noise levels or contaminants.

Objective

To be able to provide a workplace that is safe and accessible for everyone, Wästbygg Group's Business Partners are encouraged to produce and adhere to a long-term health and safety plan that takes into account factors such as age and differing abilities.

4. Business ethics

4.1 Prevention of corruption and brib

Our requirements

Wästbygg Group's Business Partners must never be involved in, encourage or tolerate any forms of corruption or bribery. Wästbygg Group's Business Partners, their employees and other parties working for them must never accept or offer money, gifts or other benefits in return for Wästbygg Group, Wästbygg Group's Business Partners or any of their close associates receiving or retaining a post, product, business opportunity or other benefit.

Objective

Wästbygg Group's Business Partners are encouraged to draw up and implement an effective anti-corruption programme that ensures that they and other parties performing work for them do not offer, accept or come under suspicion of offering or receiving bribes. This anti-corruption programme should also include strategies and methods (due diligence process) for checking and vetting prospective subcontractors and/or third parties in order to accurately assess the risk of bribes being accepted or offered before entering into the business relationship

4.2 Honest competition

Our requirements

Wästbygg Group expects Wästbygg Group's Business Partners to compete fairly and in compliance with applicable competition law. Non-compete agreements and collaborations may not be entered into or discussed. This includes agreements and collaborations regarding prices or customers as well as other agreements and collaborations that could limit competition.

Objective

Wästbygg Group's Business Partners are encouraged to draw up and implement a strategy for ensuring that they, and other parties that perform work for them, compete fairly and in compliance with applicable competition law.

4.3 Personal Data protection

Our requirements

If Wästbygg Group's Business Partners gain access to personal data, they are responsible for processing these data in compliance with applicable personal data law. Wästbygg Group's Business Partners have a duty to ensure that these data are not misused or used for purposes other than those for which access to the data was granted.

Objective

Wästbygg Group's Business Partners are encouraged to produce and adopt adequate personal data documentation as well as a strategy for assessing and managing risk of incorrect processing of personal data.

5. A sustainable future

5.1 Environmental responsibility

Our requirements

Wästbygg Group's Business Partners are obliged to take responsibility for the environmental impact of their operations. Wästbygg Group's Business Partners must conduct their operations in compliance with applicable environmental protection laws and ensure they have the requisite permits for their business activities.

Moreover, Wästbygg Group's Business Partners are required to document and, at Wästbygg Group's request, report on how natural resources and different energy sources are used in their operations. Wästbygg Group's Business Partners must identify areas where they consume more than necessary and reduce such consumption.

Objective

Wästbygg Group's Business Partners are encouraged to prepare and implement strategies for reducing the long-term environmental impact of their operations. Wästbygg Group's Business Partners must endeavour, as far as is possible, to use more sustainable alternatives with regard to energy sources, material and production methods, and to gradually phase out environmentally harmful energy sources, materials and production methods.

5.2 Emissions and waste management

Our requirements

Wästbygg Group's Business Partners are required to document and, at Wästbygg Group's request, report on the water, air and soil emissions caused by their operations. Wästbygg Group's Business Partners must identify areas where emissions can be reduced and strive to bring about this reduction. Moreover, Wästbygg Group's Business Partners have a responsibility to review how goods are packaged and how packagings can be recycled and/or modified to reduce environmental impact.

Objective

Wästbygg Group's Business Partners are encouraged to routinely review their emissions in order to identify areas where emissions can be reduced, as well as measures for achieving such reduction. Wästbygg Group's Business Partners are also encouraged to draw up and implement a strategy that addresses how they can plan their operations in order to, in the first instance, reduce waste and, in the second instance, allow waste to be recycled and reused. With regard to waste that cannot be reused or recycled, Wästbygg Group's Business Partners are encouraged to develop a strategy for disposing of such waste in as environmentally friendly a way as possible.

5.3 Management of hazardous substances

Our requirements

Wästbygg Group's Business Partners must identify products and items used in their production that could contain hazardous substances (i.e. substances that may be harmful to people and/or the environment) and ascertain what these hazardous substances are. Such products and items must be marked, handled, transported, stored, recycled and disposed of safely. In addition, Wästbygg Group's Business Partners must provide employees with information and training regarding these products, items and hazardous substances. Wästbygg Group's Business Partners' employees must have access to suitable protective equipment when handling such products, items and substances.

Wästbygg Group's Business Partners have a duty to inform Wästbygg Group if any products and items delivered to Wästbygg Group contain hazardous substances.

Objective

Wästbygg Group's Business Partners are encouraged to phase out use of hazardous substances and replace them with other substances that are less hazardous.

6. Reporting, investigation and handling of violations

6.1 Reporting of deviations

All actual or suspected violations of this Code of Conduct must be reported to Wästbygg Group. Wästbygg Group's Business Partners have an obligation to inform employees and subcontractors performing work for Wästbygg Group about Wästbygg Group's whistleblower function. This includes informing employees and subcontractors that they can use the whistleblower function to report suspected violations of this Code of Conduct. Wästbygg Group's whistleblower function can be accessed via Wästbygg Group's website and at <https://wastbygg.whistlelink.com>. Wästbygg Group will investigate all reports and take suitable measures if a violation is found to have occurred.

Wästbygg Group's Business Partners must never carry out reprisals against an employee or other party who informs Wästbygg Group of suspected violations. This applies regardless of whether or not Wästbygg Group's investigation finds that a violation took place, provided the person in question submitted the report in good faith.

6.2 Investigation of violations

In addition to the duty to report suspected violations, Wästbygg Group will regularly check Wästbygg Group's Business Partners' compliance with this Code of Conduct. Wherever possible, Wästbygg Group uses a self-assessment form to check Wästbygg Group's Business Partners' compliance with the Code of Conduct. However, Wästbygg Group reserves the right to perform checks in situ at Wästbygg Group's Business Partners' premises. Such checks can be carried out by Wästbygg Group's employees or, if one of Wästbygg Group's Business Partners requests it, by a third party appointed by Wästbygg Group.

6.3 Handling of violations of the Code of Conduct

As mentioned above, we at Wästbygg Group realise that this Code of Conduct imposes requirements and objectives that need to be implemented gradually and that, consequently, different business partners may have achieved different levels of progress in their compliance with this Code of Conduct. Nevertheless, we at Wästbygg Group expect all of Wästbygg Group's Business Partners to cooperate with us to meet the requirements and objectives set out in this document and to take suitable measures to remedy potential shortcomings.

If any of Wästbygg Group's Business Partners fails to comply with, or strive to comply with, the requirements and objectives set out in this Code of Conduct, and does not take suitable measures to promptly remedy any shortcomings in this regard, Wästbygg Group will have the right to terminate its collaboration with the Wästbygg Group Business Partner in question.