

Catella Group Code of Conduct

“We see Catella Group (the Group) as the sustainable link between property and capital. We provide strong local expertise on an international platform with global reach. The Group offers customized services in property and alternative investments for professional investors. We always strive to see, understand, and care for all our internal and external stakeholders. It is of importance to us that our business practices live up to our ethical standards and hence, why conducting business in a responsible way is essential.

Responsibility is at the core of our business, it is integrated in our strategy, values, and culture. This Code of Conduct (the Code) gives meaning to our values: Winning Together, Entrepreneurial Spirit, Value Creation, Empowerment and Future-focused, through explaining and highlighting our moral and ethical standpoint on how we conduct our business. We always seek to act in a fair and honest way towards each other and all our stakeholders.

Our Code explains what we expect from each other, it is our ethical compass and the governing document of the entire policy framework. The Code defines who we are and what we stand for.

I ask you to take the time to read it, understand it, follow it, and speak up if you have any concerns. You can always reach out to your manager or use the whistleblower function. Should you have questions, don't hesitate to speak to your manager, local HR, managing director or CHRO.

Our industry is changing and increasing its focus on environmental, social and governance (ESG) issues. We embrace this responsibility and want to be part of this positive drive for change, both internally and externally. Please let us all act with integrity, high ethical standards and with a sustainable agenda to be the Catella Group we all can be proud of”.

Daniel Gorosch
Interim President and CEO

We take responsible business seriously

Why do we have a Code of responsible business conduct?

Our Code of Conduct gives you high-level guidance on our shared policy framework as well as instructions on how we together create the Catella way of doing business. The Code and its policies are our ethical compass across the Group. It sets clear standards and expectations on how to act, who to ask if you are unsure and most importantly, that doing business with integrity is a shared responsibility.

Our commitment to human rights and a being a responsible business

At Catella, being a responsible business means placing a strong emphasis on respecting and upholding human rights, while also supporting international standards on labor conditions, environmental sustainability, anti-corruption, and good governance. We are dedicated to integrating these principles into our operations and relationships, guided by various international declarations, conventions, and frameworks that reflect our commitment to ethical conduct and the protection of human dignity across all aspects of our business.

These include

- [UN Universal Declaration of Human Rights](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [UN Principles on Responsible Investments](#) (UNPRI)
- [OCED Guidelines for Multinational Enterprises](#)
- [UN Global Compact](#)
- [Fundamental Conventions of the International Labor Organization](#) (ILO)

Respecting the principles concerning fundamental rights at work in the eight ILO conventions as set out in the Declaration on Fundamental Principles and Rights at Work. This includes (a) freedom of association and the effective recognition of the right to collective bargaining (ib) the elimination of all forms of forced or compulsory labour; (c) the effective abolition of child labour; (d) the elimination of discrimination in respect of employment and occupation; and (e) a safe and healthy working environment.

Where Catella is proven to have caused or contributed adverse impacts on individuals, workers, and communities we commit to remediation through legitimate processes as considered appropriate.

Who does the Code apply to?

The Code applies to everyone within the Group: employees, directors, partners and members of the Boards of Directors. All contractors, consultants and freelancers and suppliers working as part of our businesses must also follow the Code. Violations of our Code, its policy framework and instructions will not be accepted and will have consequences that could include termination of employment, mandate etc.

What is expected of me as a Catella representative?

You are expected to read, understand, and follow the Code, policies, instructions, and guidelines as well as relevant local policies, guidelines, and laws.

Always be transparent in any decisions that you make, and never use your position, company assets or deals for private gain.

Speak up and report any concerns or violations of our Code or policies. If you are unsure how to act or what to do, you can always speak to your manager, managing director, the ethics hotline or use our whistleblower function. It is important to us that you feel comfortable and secure about speaking up.

What is expected of me as a manager?

In addition to the above, you are expected to lead and promote a culture of openness and integrity based on our values. Your team should feel comfortable raising concerns. Take the time to discuss and reflect on our Code and the areas that are relevant to your team. Listen carefully to the team and try to answer questions or concerns. Should you not feel comfortable or able to answer a question properly please reach out to the relevant colleagues who can guide and support.

Most importantly, always act immediately if you are aware of potential breaches to the Code.

ESG – Environment, Social & Governance

Catella Group strives to conduct its business as responsibly as possible from an environmental, social and governance perspective. We want to conduct ourselves in a transparent, responsible, and accountable manner both internally and externally.

Diversity, equality, and non-discrimination

We should all enjoy equal opportunities. When it comes to recruitment, promotion, and training, what counts is competence, experience, and performance. We believe that diverse teams are successful teams. We understand, respect and value each other's differences, and we support and help each other. We do not tolerate discrimination, bullying, victimization, or any other kind of harassment **Fair working conditions**

We provide a professional environment that is in line with universal human and labour rights standards, applicable laws, and agreements on working hours and wage. We are free to join associations or unions, and to bargain collectively or individually. Child labour, or forced labour at any age, is not tolerated in our business or supply chain.

Health & safety

We supply and keep a safe working environment that promotes physical and psychosocial wellbeing. Our offices and facilities follow all applicable health and safety regulations. Everyone should enjoy their job and have a healthy work-life balance, so we discourage work in excess of the applicable working hours.

Protecting our environment

We only have one planet, and we as a company and individuals need to look after it. We are the link between property and capital and as such have a strong impact on the environment. We need to take responsibility for, track and measure our carbon footprint. We also must safeguard the environment through being a driver of change and improvement.

Governance

We conduct business with integrity and responsibility. We follow laws and regulations and uphold high business and ethical standards wherever we do business. We act decisively against corruption, bribery, and money laundering.

Where can I find out more?

If you want to find out more, please reach out to your local ESG representative, our Group Head of ESG or read the Sustainability Policy.

Fair employment and diversity

We are a company with strong integrity and high ethical standards. We do not tolerate any form of bullying, harassment, or discrimination. We want our businesses to reflect the societies we work in. Most importantly, we want to provide a good working environment with fair terms of employment for all colleagues.

What does this mean for Catella Group?

We observe international human and labour rights standards and we never use child or forced labour. We want our business to reflect the societies we work in. Most importantly, we don't discriminate against ethical or social background, religious belief, political opinion, union affiliation, sexual orientation, disability, family status, gender, or age. We strongly believe that diversity and embracing our differences gives us a competitive advantage as a business and employer, and that everyone should thrive based on their competence, experience, and performance.

It is important to us that every individual is valued and has the same access to working conditions, benefits, and career development opportunities such as training and education as well as promotion. We want to attract and retain talents of all ages. Life work balance is important to us, and we do not encourage excessive working hours.

As we strive to be an equal opportunities employer, we encourage both male and female employees to take parental leave and to share the burden of parenting with their partners, without repercussions at work.

We want to offer a safe and sound working environment that meets or exceeds expected standards. Local working conditions should comply with local statutory requirements and collective bargaining agreements – of course all our employees have the right to bargain collectively.

How do I do the right thing?

Always treat colleagues with respect, dignity, and courtesy, so that everyone can enjoy a workplace that is free of harassment, bullying and discrimination. Ensure that you follow applicable labour and employment laws as well as our Human Resource and Diversity, Equality and Inclusion Policy.

Treat others like you wish to be treated yourself. Never bully, victimize, or behave in a discriminatory way towards anyone, this also includes verbal intimidation or humiliation. We are an international organization and therefore should be culturally sensitive, what is acceptable in one country may not be so in another.

If you observe or are a victim of any inappropriate or unacceptable behavior in the workplace, please report it to your local HR or manager. Should you not feel comfortable doing this or not get the support expected, you can escalate the matter through the whistleblower function.

Treat others like you want to be treated

Three key things to remember:

- We do not tolerate any form of discrimination, bullying or harassment
- We want our workforce to be diverse and represent the societies we work in
- All colleagues are to be treated with respect, dignity, and common courtesy

A good and safe working environment is an integral part of the Group's responsibilities and is required by regulation as well as collective bargaining agreements. We want to promote healthy and safe working conditions, preventing occupational risks and ill health.

What does this mean for Catella Group?

We offer and maintain a healthy and safe working environment, which also includes physical as well as psychosocial well-being. It is important that everyone looks after their own health, well-being, and safety, through physical activity and life-work balance through the support, tools, and guidelines that we offer.

It is also important to be aware of safety routines such as what to do during an emergency like fire, or what PPE to wear when visiting construction sites. We can ensure a safe working environment for each other through reporting unsafe situations, but never put yourself in danger whilst doing so. Alcohol consumption related to work is reserved for special occasions and must always be in moderate amounts. Catella has a non-drug policy.

Where can I find out more?

Please speak to your manager or local HR, consult the Group Human Resource Policy, Diversity, Equality and Inclusion Policy or report a potential health and safety issue through our ethics hotline or whistleblower function.

Look after yourself –and your colleagues

Three key things to remember:

- A healthy and safe workplace is everybody's responsibility
- Acquaint yourself with emergency exits in case of emergency
- Wear the correct Personal Protective Equipment (PPE) when doing site visits

Travelling for work

Health, safety, security, costs, and the environment are all important issues to consider before deciding to travel.

How do I do the right thing?

Before making any travel arrangements, consider if virtual collaboration is enough. Utilizing modern technology does have several benefits; it helps us keep down our carbon footprint, it is more cost efficient, it reduces work disruption as well as helping to maintain work life balance.

It is not always necessary to travel, be realistic about the pros and cons and base your decision on those.

If you decide to travel, do so as smart, efficiently, and as environmentally conscious as possible. Plan ahead and keep the travel group small.

We ask you to always book your trips in available company travel portals for two reasons. One, to enable the measuring of our carbon footprint, secondly for your own safety, so that we know where you are in case of emergency. A group of local senior managers should not travel as a group on the same flight or similar for security and continuity reasons.

When travelling for work, we represent the Group and should therefore act accordingly. Acquaint yourself with your destination's basic local customs and habits, to ensure that you act respectfully. Never buy sexual services while on a business trip, neither during nor after working hours. Consume alcohol in moderation during travels and note that we have a no drugs policy.

Only travel if you must

Three key things to remember:

- You represent the company when travelling for business
- Consider the pros and cons when planning to travel
- Book environmentally conscious options

Business ethics and integrity

Catella Group is committed to conducting business with integrity, honesty, and legal compliance.

Gifts & Hospitality

We make sure that gifts and hospitality always support a clear business objective.

Defining gifts and hospitality

A gift is defined as the offering or receiving of goods or services. A gift becomes a bribe when there is intent to influence business relationships and decisions.

Business entertainment and hospitality, meetings with current or potential customers, suppliers and stakeholder relations must follow our Code as well as applicable laws and regulations.

What does this mean for Catella Group?

We always pay all our business travel and accommodation expenses. Never accept gifts and hospitality at a time when they could influence your and our business decisions.

How do I do the right thing?

Hospitality and gifts can complicate business decision making, so think carefully before offering or accepting them. Don't offer or accept gifts, travel, payments, or hospitality in return for favorable decisions or business advantage. Use your judgement and moral compass to evaluate the situation.

You may potentially do business in countries where giving and receiving gifts are custom, and it would be considered rude not to. Should this be the case, only entertain this custom of gifts once they no longer could be perceived to influence business decisions. Also, gifts should be modest and proportionate.

However, don't give any gifts, aside from low value company branded items to public officials.

We can help ourselves and our suppliers, customers, and partners through communicating our policy to them.

Where can I find out more?

If you are unsure what to do, or have further questions please speak to your manager, managing director or use the whistleblower function.

Treasure your independence

Three key things to remember:

- Never offer or accept gifts, travel, payment, or hospitality in return for a favorable decision or business advantage
- We always pay our own business accommodation and travel expenses
- If in doubt about how to act, always consult your manager

Conflict of Interest

To always give our partners and customers the best possible service, we make sure that all our decisions are taken independently of private interests or divided loyalties. We actively avoid or mitigate situations that create potential or perceived conflict of interest with our activities. We always act in the best interest of the entire Group.

Definitions:

A conflict of interest exists when financial or other personal incentives influence an employee's professional performance or decision making.

What does this mean for Catella Group?

Employees must not make personal gain from business transactions or non-public information obtained through our work. Any tender or procurement decision processes must be fair and transparent.

How do I do the right thing?

Always keep business relationships professional, avoiding over familiarity. Don't give preferential treatment to personal contacts such as family or friends and avoid situations that might create suspicion of it.

If you are thinking of becoming or are a board member, employee, or consultant of an external business, non-profit or other charitable organization, make sure you obtain approval from your local managing director first. Off course you can take part in external activities outside your normal job but tell your manager if it creates potential or perceived conflict of interest.

Do a quick check and ask yourself: Could my personal relationship influence business decisions? Does my role include any business decision making authority over family members or close friends?

If these questions raise any potential issues, discuss the situation with your manager or managing director.

Where can I find out more?

If you are unsure what to do, or have further questions, please speak to your manager, managing director Group Head of Legal, the Anti-Bribery and Corruption Policy or the Policy on Related Party Transactions and Conflicts of Interest.

Always take independent decisions

Three key things to remember:

- Avoid situations that may compromise, or may appear to compromise, your decision making
- Inform your manager of a potential conflict of interest involving yourself or others
- Don't give preferential treatment to personal contacts such as friends and family

Improper payments

We act with the highest standards of transparency and integrity across the Group. By doing so we can ensure that our actions and decisions are always in the best interest of clients, our business and society.

Definitions:

- **Corruption** is the false use of power for private gain, typically involving bribery
- **Bribery** is the offering, giving, authorizing, requesting, or receiving of financial, any item of value or other advantage as means of influencing the actions of a person
- **Financing of corruption** is the payment made to a third party – such as an agent, partner, vendor, or consultant – who uses it (or part of it) for a corrupt activity
- **Facilitation payments** are payments offered or made to a public official to secure or speed up a process or approval necessary by a government or public official

What does this mean for Catella Group?

We keep accurate and transparent financial records, ensuring that all payments are made for the right reason. We don't offer, accept, provide, authorize, request, or receive anything of value that could be intended to influence or reward a specific business decision. This includes bribes of all sorts, direct, indirect and those routed through a third party. This also includes facilitation and financial payments that could encourage or lead to corruption.

How do I do the right thing?

Never make personal gain or profit from a business transaction. This includes accepting, providing, authorizing, requesting, or receiving a bribe.

Always be careful when engaging with third parties, such as clients, lobbyists, agencies, and consultants. If you are aware of potential corruption or bribery, report it to your manager, managing director or use the whistleblower function as soon as possible!

If you are asked to make a facilitation payment or bribe, stand your ground, refer to the Catella Code of Conduct and contact your manager or managing director. We will support you in solving the situation.

Make sure your documents are in order and well prepared when approaching public or government officials in regions where facilitation payments could occur, this reduces the possibility of being asked for additional payments.

Where can I find out more?

If you are unsure what to do, or have further questions please speak to your manager, managing director, Group Head of Legal, the Anti-Bribery and Corruption Policy or Anti Money Laundering (AML) and Counter Terrorist Financing (CTF) Policy.

Don't compromise your integrity - don't give or take bribes

Three key things to remember:

- Nobody should gain personally from our business decisions
- Never make facilitation payments
- Always keep accurate and transparent financial accounts

Public officials

Engaging with public officials is an important part of our business, as they oversee decisions that concern city development, granting permits and other issues that affect our business. Therefore, it is even more important that we hold ourselves to high ethical standards when working with public officials or people with political ties.

Definitions:

A public official or a person with political ties is:

- A member or employee of a governmental institution, department, or agency
- Anyone acting in an official capacity or on behalf of a government
- A political party official
- A candidate or appointee to a political or governmental office
- An employee of a state or government-owned business

What does this mean for Catella Group?

Together we want to protect our employees and the company from potential conflicts of interest and corrupt payments.

It is important to keep in mind proportionality, and what is ethical and correct in dealing with public officials. Customary coffee and meals during business-related meetings or events are of course important to our business and maintaining relationships. However, we do not offer gifts or non-business-related entertainment. Everything needs to be part of a legitimate business process.

How do I do the right thing?

Always apply the four-eye principle when meeting public officials. This makes tricky situations less likely to arise, and you have someone who can confirm your version of events. It is advisable to have a meeting agenda, to take meeting minutes and to share these afterwards.

Never give gifts to public officials except for branded company items of minimal value (if permitted by local law or the recipients code of conduct).

Where can I find out more?

If you are unsure what to do, or have further questions please speak to your manager, managing director, Group Head of Legal or Anti-Bribery and Corruption Policy.

Avoid meeting public officials on your own, bring a colleague and apply the four-eye principle

Key things to remember:

- Never offer gifts or business entertainment to public officials, or officials involved in public procurement
- Ensure that decisions and agreements involving public officials are fully documented

Company information – privacy, information security and data protection

Definition

Non-public information means internal, confidential, or secret information that isn't intended to be public.

What does this mean for Catella Group?

We should always protect our information through integrity, confidentiality, and availability.

As part of our work, we may have access to information about our operations that is not available to other people within and outside the organization. This could include financial data, business plans, contracts, and customer or supplier details. We protect confidential information from improper use and do not share it – not even with colleagues – unless properly authorized to do so.

Integrity means that we ensure that information is accurate and complete. Everybody has the fundamental right to privacy. We protect all personal data entrusted to us, and we follow all data protection laws and regulations wherever we work.

Confidentiality means that we protect information from exposure to unauthorized people. We only collect, access, or process personal data that we need to conduct our business, and only for the purpose for which it is intended.

Availability means that we ensure that information is accessible and usable when needed.

How do I do the right thing?

Only use company information for work. Leave the disclosure and publication of information to the communications and investor relations team.

“Protect sensitive information and think about who you share it with”

- Protect company information against accidental or unauthorized disclosure or misuse, especially when handling information outside your workplace e.g., when travelling or working in public spaces.
- Telephone calls can be overheard, documents can be forgotten in public. Use your computers privacy filter when working in a public area or request one from your IT department.
- Keep your desk clean and ensure that you don't leave sensitive information in printers.
- Only use company approved equipment, services, and software. Follow the guidelines and terms set up for the Group and/or your local IT department.

Do not expose yourself and your company to cyber risks. The Group performs cyber awareness regularly. Do not open suspicious or unexpected e-mails and do not click on links you are not sure about. We condemn the use of any form of adult content or gambling sites on company devices.

If you suspect or are aware of any security incident, fraud, threat, or misuse please report it to your manager or IT department.

We only use company email, corporate communication platforms, internet connectivity and devices for legitimate and authorized business purposes. Limited private usage is fine too – if it does not hurt our work or contradict this Code or our policies.

If we leave the Group, it is time to return all company assets in our possession. After we leave, confidential information stays confidential.

Where can I find out more?

Reach out to our Group CIO . If you are unsure what to do, or have further questions, please speak to your IT department, manager, managing director, Data Privacy Policy or IT Policy.

Communications & media relations

We communicate openly, transparently and in a way that reflects our values. By doing this consistently we always aim to build and maintain a strong public brand image that supports our various business activities.

What does this mean for Catella Group?

All our communication should be open, transparent, relevant, and keeping in mind the recipient of the information. We provide all the information in accordance with local laws, as well as the rules and practices that govern listed companies. The Group has dedicated communications specialists who are the representatives of the company.

Our brand is one of the most valuable assets we have, and therefore we need to protect and safeguard our identity, the values it carries and its visual identity. Our professional communication should always lead to increased knowledge and trust in our brand and Group.

Each company in the Group has its own appointed spokespersons who are entitled to communicate their opinions regarding their area of responsibility. With regards to financial information for the entities and the group, The Group CEO, CFO and Head of Group Communications are the spokespersons.

We do not support any political organisation or party. However, we may issue statements on issues of concern to our Group, that may be interpreted as political, however, these should always be factual and transparent.

How do I do the right thing?

Act responsibly online, using your common sense when mentioning or referring to Catella, as you are responsible for the content you publish.

Always review what you have written, if you are not sure or it makes you uncomfortable, speak to a communications colleague or your manager to get advice, or don't share the information.

Never share non-public information such as revenues, forthcoming products or services, financial results, or any other confidential information.

We are a group of companies, that even though we act as a Group, we are also individual entities, so before sharing information, think about whether it is to be shared with the broader internal audience. Should you get requests from external stakeholders such as the media or investors, please refer them to the communications team or even investor relations.

Where can I find out more?

For more information, please read the Information and Communications Policy or reach out to the local or Group communications and investor relations team.

Think first, then share information

Three key things to remember:

- Our communication should be proactive, transparent, relevant, and legally compliant
- Keep in mind who is the recipient or has requested the information
- Act with care and responsibility when making information externally available or sharing online

Inside Information

We are part of the financial market, being a company listed on a regulated market (Nasdaq Stockholm), and we need to act and behave ethically to support its integrity. Therefore, we always pursue high ethical standards with respect to confidential information and inside information.

Inside Information is information of a precise nature, which has not been made public, relating, directly or indirectly, to Catella or its financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments.

What does it mean for Catella Group?

We take great care to protect confidential business information, especially when it is considered Inside Information.

How do I do the right thing?

Insider dealing and unlawful disclosure of Inside Information is illegal. Never reveal confidential information or Inside Information to unauthorized people. Also, do not spread rumors or misleading information. While in possession of Inside Information, do not engage in any transactions (buying, selling, or cancelling or amending an order) in relation to the financial instruments of the company which the information relates to. Never cause anyone else to engage in such transactions.

Where can I find out more?

For more information, please read the Insider Policy or contact the Insider Committee at insider@catella.se.

If you know more than the general public – follow the guidelines

Key things to remember:

- Protect confidential information
- Never disclose Inside Information
- Never act, or cause anyone else to act, on Inside Information
- Do not spread rumors or misleading information

Money laundering

Through following rules, regulations, standard processes and being transparent in all our financial activities we aim to ensure that our financial activities are ethical and legal.

Definition

Money laundering is a term used to describe the process by which criminals disguise the original ownership and control of the proceeds of criminal conduct by making such proceeds appear to have come from a legitimate source.

What does it mean for Catella Group?

We never deal with or take part in transactions that involve unconnected parties, unusual payment methods or abnormal terms and conditions. When engaging with current or potential customers, clients or suppliers, we do so in professional and non-extravagant ways. We conduct KYC's as well as due diligence checks to ensure the legitimacy of the above-mentioned.

How do I do the right thing?

Carry out all deals and financial activity with complete transparency and in line with standard processes.

Always report suspicious transactions and potential or actual money laundering. Always perform due diligence and KYC of third parties before entering a business deal. If you suspect anything, please use the whistleblower function.

Where can I find out more?

For more information, please reach out to your managing director, local finance team, Group CFO, Anti-Bribery and Corruption Policy or Anti Money Laundering (AML) and Counter Terrorist Financing (CTF) Policy

You don't have to launder something that was clean from the beginning

Four key things to remember:

- We carry out due diligence on third parties before entering a business deal
- We carry out a KYC (know your customer) before entering a business relationship
- We carry out financial activities in a transparent and ethical way
- We don't engage in deals that involve unconnected parties, unusual payment methods or abnormal terms and conditions

Sponsorships and donations

Sponsorships and donations can be an effective way of developing our business and supporting the societies we operate in. We should align these with our ESG ambitions and aspects, so that they support our business objectives and create value.

What does it mean for Catella Group?

It is important that any support we give is consistent with our ESG and business strategy, so that we support similar causes over time. Always assess options against a reputation and corruption profile. Support or donations must be disconnected from ongoing business deals. It cannot be connected to political support, political payment, or bribery. We do not support individuals, organizations or activities that do not align with our ethical outlook. We do not support activities or organizations that have a negative environmental impact.

How do I do the right thing?

Plan any sponsorships and donations activities carefully with your PR & communications team as well as ESG contacts. Ask yourself whether we'd be able to communicate the support publicly. You should track the recipients' use of sponsorship as well as tracking the use of it against agreed targets. Do a basic due diligence process when assessing the recipient.

Where can I find out more?

For more information, please reach out to your local managing director or Head of Group Communications.

Only sponsor or donate to causes that align with our ESG and business strategy

Three key things to remember:

- Ensure alignment with ESG and business strategy
- Don't give preferential treatment to personal contacts
- Avoid situations that may compromise your decision making

Whistleblower function

We want to encourage a culture of openness where we look after each other's well-being and the interests of the Group.

What does this mean for Catella Group?

Integrity, transparency, and openness are of vital importance to us. Most of all, it is important to create an environment where everyone feels at ease with and reassured that they can lift issues of concern without reprisals, either with their management or anonymously through the whistleblowing function.

If you do not feel comfortable raising an issue with your manager or managing director, you can use the whistleblowing reporting function.

How do I do the right thing?

If you know of, or suspect a breach of the Code, laws or regulations, you should react and file a report.

What can be reported?

- Financial crime such as corruption, bribery, financial misconduct etc.
- Conflict of interest
- Harassment and discrimination
- Security failings
- Endangerment of employee lives
- Environmental crimes or offences

How do I file a whistleblower complaint?

There are two possible routes to take:

- Report your complaint orally or in writing to your manager or local senior management.

If something seems fishy or does not feel right – blow the whistle!

Four key issues to remember:

- Act quickly if you suspect or have witnessed non-compliance of the Code, laws or regulations
- You will be protected against reprisals, and we do not accept retaliation
- Your anonymity will be safeguarded
- All concerns are taken seriously

- File an anonymous report through the whistleblowing function on the Catella website. See instructions below.

How to use the whistleblower function:

To safeguard your anonymity, the function is provided by an external and independent provider. The reporting channel is both encrypted and password protected. You do not need to provide your identity if you do not wish to. However, note that it is easier to track and find out more about the issue that you are flagging if you do share who you are. Rest assured that your identity always will be treated confidentially.

1. You don't need to have proof of your suspicion, but accusations must be made without malicious intent or knowing that the accusation is false.
2. It is important that you describe all the facts in the case, including the circumstances you believe are less important.
3. Please develop your statement carefully and attach everything that could be relevant.

Submit your whistleblower here: [Whistleblowing - Home \(2secure.se\)](https://wb.2secure.se) or type in <https://wb.2secure.se/wbui/> and fill in the company code: fgo629 (three letters three numbers) You can choose from a variety of languages, so choose the one you feel the most comfortable with.

Who receives the report?

All reports filed through the function will be received and handled by 2Secure. They have long-term experience of investigations and have global capacity if needed. You will stay anonymous unless you approve otherwise. You can also choose to stay anonymous within 2Secure. They will work in consultation with Catella's Whistleblower Committee.

Feedback

Rest assured that all reports will be investigated regardless. You will receive a confirmation within 7 days and your case will be dealt with within 3 months.

Where can I find out more?

For more information, please reach out to your local managing director, CHRO , CLO or Whistleblowing Policy.

Our Code guides us

Our Code of Conduct is our moral and ethical compass – it guides us, helps us and supports us. We are all responsible for familiarizing ourselves with our Code, reading up on relevant policies that are part of the framework and seeking advice or guidance from relevant colleagues.

You can always start by asking yourself these three questions:

- Is it legal and does it comply with our Code?
- What would happen if it was shared with others?
- Am I comfortable with it?

A selection of relevant policies can be found on catella.com, the complete governance framework and its policies are available on the Catella intranet.

Contact Person(s):

Chief Human Resources Officer

Revisions

DATE:	VERSION, CHANGES MADE AND NAME OF PERSON WHO MADE THEM
2021-12-03	Version 1.0, Created policy, Head of Group HR, Mathias de Maré
2023-05-10	Version 1.1, Human rights (ILO), suppliers, ethics hotline, Head of Group HR, Mathias de Maré (mathias.demare@catella.se)
2024-05-22	Version 1.2, minor adjustments and clarifications to align with policies, Head of Group HR, Mathias de Maré (mathias.demare@catella.se)
2024-10-04	Version 1.3, minor adjustments to clarify our Human Rights focus, CHRO, Mathias de Maré (mathias.demare@catella.se)