

Catella Group Human Resource Policy and Procedures

Contents

1. Introduction	2
1.1. Objective.....	3
2. Scope	3
3. Policy statement.....	3
3.1. Vision and values	3
3.2. People & Culture	3
3.3. Diversity, equality and inclusion	4
3.4 Whistleblowing.....	4
4. Roles and Responsibilities	4
4.1. Management Responsibilities.....	4
4.2. HR Responsibilities.....	4
4.3. Employees Responsibilities.....	5
4.4. Consultants Responsibilities	5
5. Recruitment and Onboarding	5
5.1. Employee Screening.....	6
5.2. Employee Onboarding.....	6
5.3. Disciplinary Process	6
6. Employment Termination.....	7
7. Performance and development	7
7.1. Training and Awareness	7
7.2. Annual Performance Development Cycle	8
8. Reviews & Succession Planning	8
9. Compensation & Benefits.....	9
10. Health & Safety.....	9
10.1. Alcohol and drugs	9
10.2. Emergency Contacts.....	9

11.	Exceptions	9
12.	Document Review	9
13.	Acronyms	9
14.	References	10
Revisions		10

1. Introduction

This Catella Group Human Resource Policy (the “Policy”) applies to all subsidiaries and affiliated companies of Catella AB (the “Catella Group”). This Policy is prepared by the Group Management and approved by the board of directors of Catella AB. Deviations from this Policy may only be made if prescribed by local laws and regulations. Wherever local regulations or applicable regulatory requirements are stricter than the requirements set out in this Policy, the stricter standard shall be applied. Any deviation shall be reported to the Group CLO.

1.1. Objective

The objective of this Policy is to act as a general steering document for HR processes in the Catella Group and provides an overview of what our employees can expect from Catella as their employer as well as how we expect our employees to act and operate within the Catella Group.

This HR Policy is a complement to local laws and regulations in the operating countries and is the foundation for people management processes in the Catella Group. Additional specific guidelines to ensure compliance with local laws and regulations, including collective bargain agreements, may be required to be developed in each subsidiary.

Catella Group is committed to protecting the security of its business information in the face of incidents and unwanted events. With this Policy, the management of Catella also sets out how information security is addressed in HR related matters starting with pre-employment screening up to employment termination processes.

2. Scope

This HR Policy applies to all Catella employees or individuals with employment-like forms within the Catella Group, regardless of location.

3. Policy statement

3.1. Vision and values

The Catella Group prioritizes strong business ethics, seeking to be a trusted partner in the financial and real estate sectors through a combination of expertise and commitment.

Within Catella, the values of Winning Together, Entrepreneurial Spirit, Value Creation, Empowerment, and Future-Focused play a key role in shaping how employees approach their work and interactions. These values serve as a guide for navigating various situations, enabling sound decision-making and effective collaboration to achieve shared goals.

These values reflect the essence of the Catella Group, offering a foundation for its identity and purpose.

3.2. People & Culture

The Catella Group focuses on fostering the growth and development of its people while cultivating a strong organizational culture. Having the right individuals in place and supporting their ability to excel is considered essential to long-term success. A well-structured organization, with clearly defined roles, responsibilities, and competencies, plays a key role in achieving this.

Creating a workplace where employees take pride in being part of Catella is a priority. Collaboration, knowledge-sharing, and constructive feedback contribute to continuous improvement, while achievements and outstanding efforts are acknowledged and celebrated.

To support these efforts, structured processes shall be in place for recruitment, onboarding, offboarding, professional development, talent management, succession planning, and compensation. These initiatives help maintain an environment aligned with Catella's mission and values.

3.3. Diversity, equality and inclusion

The Catella Group is committed to ensuring equal rights and opportunities for all, regardless of gender, gender identity or expression, ethnicity, religion or belief, disability, sexual orientation, or age.

Creating an inclusive and safe environment where all colleagues feel valued is a priority. Honesty, respect, and trust serve as the foundation of workplace interactions, and any form of discrimination is not accepted. Every employee shares the responsibility of upholding these principles and contributing to an inclusive culture.

To support a diverse workforce, Catella actively challenges existing perceptions by embracing a broader perspective on individual differences. More details can be found in the Diversity, Equality, and Inclusion Policy.

3.4 Whistleblowing

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 external whistleblowing function or alternatively through the internal ethics hotline. The ethics hotline can be used by all Catella Group employees with reference to ethical and social issues. For more information please read the Whistleblower Policy and find out more about the internal ethics hotline on the intranet. Integrity, transparency, and openness are fundamental to Catella. It is essential to foster an environment where everyone feels safe and confident in raising concerns in good faith without fear of retaliation.

Employees can report issues directly to their management, anonymously through the external whistleblowing function, or via the internal ethics hotline. The ethics hotline is available to all Catella Group employees for reporting ethical and social concerns.

For more details, please refer to the Whistleblower Policy and access information about the internal ethics hotline on the intranet.

4. Roles and Responsibilities

4.1. Management Responsibilities

The Group CEO holds overall responsibility for this HR Policy.

The local CEO, in collaboration with the local HR manager (if applicable), is responsible for implementing this Policy within their respective organization. Local employee rules shall be developed to ensure compliance with both this steering document and applicable local labour laws and regulations.

Managers have the responsibility to demonstrate the desired behaviours as outlined in the Policy and to proactively enforce the Policy on a day-to-day basis.

4.2. HR Responsibilities

The Human Resources department is responsible for carrying out the following duties in alignment with applicable laws and regulations:

- Conduct professional background screening.

- Maintain the terms and conditions of employment including those related to information security responsibilities.
- Define and communicate the roles and responsibilities to all personnel.
- Maintain the non-disclosure agreements including confidentiality obligations during employment (and up to 3 years after termination for specific roles) for personnel with access to higher levels of classified information.
- Apply discipline sanctions for personnel who have committed a security breach or data breach or do not comply with Code of Conduct.
- Act promptly in case of termination or change of employment and notify the IT Department for immediate termination of account and access rights.

4.3. Employees Responsibilities

Catella employees shall fully comply with all of the policies, processes and procedures in force during the period of their employment, and to report any breaches of these policies of which they may become aware of.

Failure to comply with the above policies and procedures may result in the termination of employment and legal action being taken.

All Catella employees shall sign the Code of Conduct.

4.4. Consultants Responsibilities

Consultants providing services to Catella are required to comply with all applicable policies, processes and procedures in force during the period of their contract and for a specified period of time after the contract has ended. This period will be decided based on occupied position and its criticality.

Failure to comply with the above policies and procedures may result in the termination of the contract and legal action being taken.

All Catella consultants, interns or volunteers are required to sign the Code of Conduct. In addition, if access to Catella's information systems is given, they are also required to sign a Non-Disclosure Agreement before their engagement starts with Catella.

5. Recruitment and Onboarding

To ensure our competitive advantage and maintaining a driven, business and future oriented company culture, it is crucial to attract and recruit people with the required values, competencies, and skills. We therefore apply a thorough process to define recruitment requirements, attract, select and introduce new colleagues.

Prior to external recruitments the internal talent pool is checked along with existing succession plans.

When recruiting, we strive for a well-balanced representation of both genders. When there is an imbalance, the under-represented gender should be encouraged to apply for vacancies and given priority if the competence is equal, but this should be expressed in a way that is not perceived as discriminatory.

Diversity to us means that everyone has the same rights, opportunities and obligations in all areas regardless of gender, age, ethnic or cultural background, disability, sexual orientation, transgender identity and religion or other belief.

Everyone must be treated equally in both internal and external recruitment, provided that the competence is equal.

An efficient onboarding process is essential to ensure commitment to our goals, values and culture and to give our new colleagues a solid foundation to embark on their employment with us. The onboarding process is the link between the recruitment process and the development process.

5.1. Employee Screening

This control applies particularly to those employees, contractors, interns, and volunteers who will have access to Catella information systems. Screening should be conducted as per Human Resources internal policies, and in accordance with relevant laws, regulations and ethics, and proportional to the business requirements, the classification of the information to be accessed, the role criticality and the perceived risks.

The purpose of the background checks is to ensure the safety of Catella's existing employees and information systems, and this goal is achieved by ensuring the employees hired possess the highest possible level of integrity and business ethics and the expected academic and professional qualifications.

The background check should include:

- Criminal background clearance
- Education verification (for highest level only)
- Cybersecurity background clearance (social media check, public records, forums, blogs)

5.2. Employee Onboarding

At least five working days before the first working day, Human Resources department will inform the IT Operations department about the new hire. If hardware needs to be procured, this must be ordered a month in advance. IT Operations shall ensure that all the following actions are completed before the employee's first day:

- Create the user account.
- Assigns privileges as per the access rights matrix specific for the user role of the new joiner.
- Create the user account email.
- Prepare laptop and mobile phone
- Update the IT assets inventory with the assets allocated to the new employee

On the first working day, the HR department will provide the new employee with mandatory onboarding training covering corporate policies, ethical conduct, and workplace responsibilities. The Code of Conduct and Acceptable Use Policy shall be signed on the first day.

Furthermore, HR shall request employees in key roles in Catella entities performing financial activities under the DORA scope to sign the Acknowledgement Statement (Appendix x) .

A copy of the signed statement should be retained by the employee and the original will be filed by the HR department in the relevant employment records.

5.3. Disciplinary Process

This process shall be initiated by the immediate manager of the employee who committed an information security breach. This may be a relatively minor event such as the unauthorised use of someone else's user account or something more major such as the deliberate theft of confidential information.

The process shall allow for proportionate and graduated action depending on the severity of the information security breach and in case of repeated breaches by the same individual.

The employee has the right to be represented or assisted by a third party, including a union representative where appropriate.

The details of the breach and the progress of the disciplinary process will be documented by the organization and will be regarded as confidential.

The outcome of the management assessment will be a decision regarding which of the following actions to take:

- No disciplinary action (if the breach is not felt to be sufficiently serious to warrant disciplinary action, then other steps may be taken to prevent a recurrence such as informal advice, training, coaching and counselling. No record on the employee's file)
- Verbal warning (on the employee's file but will be disregarded after 12 months from the date of the warning)
- Written warning (on the employee's file but will be disregarded after 2 years from the date of the warning)
- Termination (In the case of a serious single breach or repeated breaches for which warnings have previously been issued).

The action should be communicated to the employee by the immediate manager if possible.

6. Employment Termination

An employment termination process shall be defined that emphasize the obligations to return all assets, remove all access rights, and ensure confidentiality and property rights after termination of employment, contract or agreement.

Timely before termination day, the employee shall hand-over to direct manager/designated successor a document listing and describing the tasks and responsibilities and ensure its support whilst those tasks are performed to verify the document's accuracy and completeness.

In the last working day, HR department will issue and give to the employee the End of Service Clearance Form (Appendix x) , and will notify the IT Operations to proceed with the actions under its responsibilities.

IT Operations performs the following steps:

- deactivate the user account, email account and remove all application access rights for the account.
- remove all network access rights of the terminated employee

Upon completion of these tasks, the IT Operations sends confirmation to HR and the collection of IT assets will be conducted by HR.

The terminated employee is considered cleared once all the above steps are finalized.

7. Performance and development

At Catella, performance and competence development are essential priorities. To foster growth and maximize potential, investing in our employees is also an investment in the success of our business. Therefore, each subsidiary is expected to conduct an annual assessment of training needs in collaboration with their employees to ensure continuous development and alignment with business objectives.

7.1. Training and Awareness

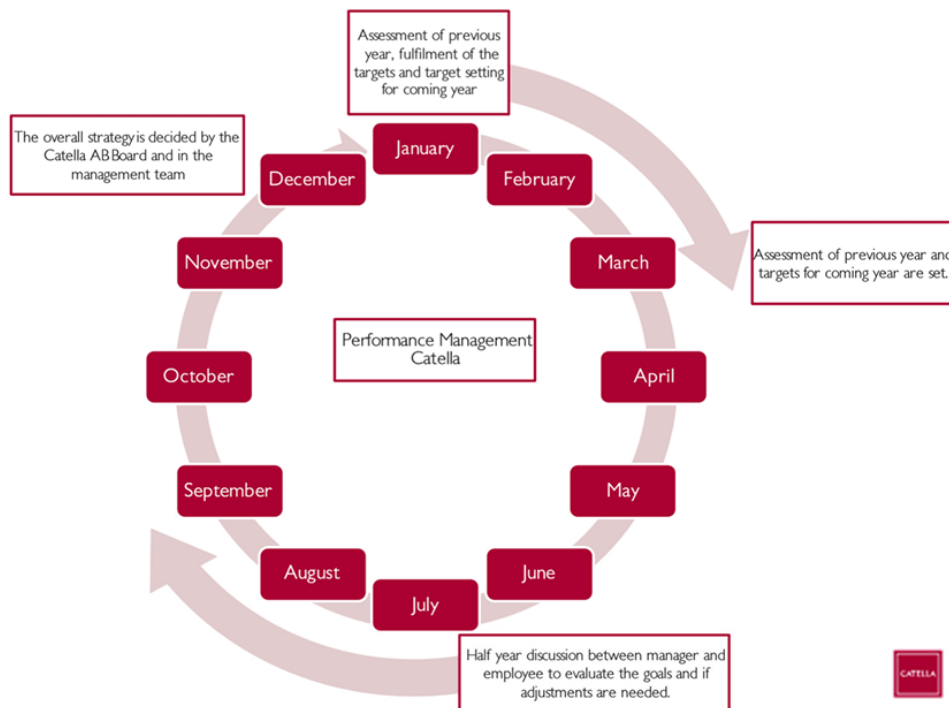
Catella shall allocate and periodically review the appropriate budget to fulfil the digital operational resilience needs in respect of all types of resources, with a special focus on relevant ICT security awareness programmes and digital operational resilience training, and ICT skills as compulsory modules for employees and senior management. These programmes and training shall have a level of complexity commensurate to the remit of their functions.

Members of the Catella extended management shall actively keep up to date with sufficient knowledge and skills to understand and assess ICT risk and its impact on the operations of Catella, including by following specific training on a regular basis, commensurate to the ICT risk being managed.

Where appropriate, Catella shall also include ICT third-party service providers in their relevant training schemes.

All employees are expected to actively participate in assigned training and awareness initiatives to develop their competencies, enhance their knowledge, and contribute to a secure, compliant, and resilient workplace environment.

7.2. Annual Performance Development Cycle



The employee dialogues are conducted with a retrospective and forward-looking view.

All employees within the Catella Group should have at least two formal dialogues per year setting the plan for the coming year and assessing the previous year where past and future performance development is followed up. Continuous follow-up and feedback, in addition to the annual formal meetings are critical for conducting thorough and relevant performance development meetings. Both the employee and the manager are responsible to prepare for these meetings.

8. Reviews & Succession Planning

Catella performs organization reviews, identifies high performers, potentials and talents, and defines activities to develop and retain these, correlate these with the succession plan of business needs and plan appropriately.

9. Compensation & Benefits

Remuneration shall be designed to attract, retain and motivate our employees. Total remuneration shall be relevant and fair and consist of fixed salary, benefits and may also include variable salary. Any variable salary shall be linked to pre-set performance goals.

Specific regulation regarding remuneration exists for Catella's regulated entities under supervision e.g. regarding deferral of variable salaries. Each entity shall, at any time, comply with applicable laws and regulations and adopt more specific remuneration policies as required.

10. Health & Safety

A good and safe working environment is required by law and regulations but is also an integral part of ensuring our values are delivered on. At Catella, we set high standards for our working environment, which includes both health and safety measures as well as preventative psycho-social activities. We continuously promote a company-wide culture for safeguarding health and safety at work. Health and safety activities shall be proactive, preventive, and realized through cooperation between Catella and its employees and stakeholders.

Local MD/CEO shall ensure that local law and regulations relating to work safety and work environment are complied with and shall adopt local instructions as required.

10.1. Alcohol and drugs

Alcohol consumption in the workplace or while representing Catella is permitted only on special occasions and must always be in moderate amounts. Non-alcoholic alternatives must be provided, and no employee shall be expected or required to consume alcohol.

Employees found to be under the influence of alcohol or drugs while working shall be sent home if it is safe to do so. Any incidents or suspected substance abuse must be reported, investigated, and addressed by local HR.

Catella recognizes substance abuse as a medical condition and is committed to prioritizing the health and well-being of its employees.

10.2. Emergency Contacts

All entities, regional and functional directors/managers are responsible for collecting and updating emergency contact information for their employees on a central contact list. Employees are responsible for informing any changes to their emergency contact details. The contact information should be collected at the time of employment, with the exception for individuals with protected identities. If the employee does not wish to disclose any contact information, this must be recorded.

11. Exceptions

Any exception to the policy rules shall be reported to the Group Compliance Officer, who shall record the exceptions, submit them for approval by the Board of Directors.

12. Document Review

This Policy shall be reviewed annually or upon significant regulatory updates, or changes to the organization, business strategy and digital operational resilience strategy, with updates subject to approval by the board of directors.

13. Acronyms

BIA – Business Impact Analysis

CIA – Confidentiality, integrity, and availability

DORA – Digital Operational Resilience Act
 ICT – Information and communication technology
 RA – Risk assessment

14. References

Digital Operational Resilience Act (EU Regulation 2022/2554)
 ISO/IEC 27001: Information Security Management Systems (Primary standard for achieving DORA compliance)

Contact person(s):
 Head of Group HR

Revisions

DATE:	VERSION, CHANGES MADE AND NAME OF PERSON WHO MADE THEM
2016-05-30	Version 1.0, Created policy, Johan Nordenfalk
2020-05-26	Version 1.0, Mathias de Maré mathias.demare@catella.se
2022-05-05	Version 2.0, Mathias de Maré, mathias.demare@catella.se
2023-02-09	Version 2.1, clarification responsibility for work environment, Mathias de Maré, mathias.demare@catella.se
2023-05-10	Version 2.2, New values and reference to reporting channels, Mathias de Maré, mathias.demare@catella.se
2024-05-22	Version 2.2, no updates, Mathias de Maré, mathias.demare@catella.se
2025-05-20	Version 3.0 General rework due to DORA, Mathias de Maré, mathias.demare@catella.se