

# CATELLA GROUP CODE OF CONDUCT



“Catella is the sustainable link between property and capital. Our pan-European platform, combined with deep local expertise and global reach, is a key strength that enables us to translate local market trends into global strategies. From this vantage point, we provide tailored real estate investment and advisory services to professional investors focused on long-term value creation.

Catella is defined not only by what we do, but by how we do it. Responsibility, accountability, and transparency underpin the integrity and respect we show our stakeholders and are fundamental to our business. These principles must be reflected in how we work and make decisions every day. It is essential that our business practices consistently uphold the ethical standards and values we represent.

Our Code of Conduct articulates our values: Winning Together, Entrepreneurial Spirit, Value Creation, Empowerment, and Future-focused. It serves as our ethical compass, guiding our conduct and supporting a culture of trust, fairness, and accountability.

I encourage you to read the Code of Conduct carefully and apply its principles in your daily work. Equally important is our shared responsibility to speak up if something does not feel right. If you have any concerns or questions, please reach out to your manager, local HR, your local MD or use our whistleblower function.

Our industry is evolving rapidly, with an increasing focus on environmental, social, and governance matters. We welcome this development and are committed to contributing to positive change, both internally and externally. Let us ensure that high ethical standards remain central to how we operate across the Group.

*Rikke Lykke*  
CEO

# 1. 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 can together create the Catella way of doing business. The Code and its policies are our ethical compass across the Catella 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 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 labour 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)
- OECD 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:

- freedom of association and the effective recognition of the right to collective bargaining
- the elimination of all forms of forced or compulsory labour
- the effective abolition of child labour
- the elimination of discrimination in respect of employment and occupation
- a safe and healthy working environment.

We also recognize human trafficking as a serious violation of human rights and shall manage any material risks related to our own workforce in relation thereto.

If Catella is found to have caused or contributed to adverse impacts on individuals, workers, or communities, we shall commit to remediation through legitimate and appropriate processes.

## Who does the Code apply to?

The Code applies to everyone within the Catella Group including employees, directors, partners and members of the boards, both local and Catella AB. Additionally, all contractors, consultants, freelancers and suppliers engaged in our business operations shall also adhere to the Code or the Supplier Code of Conduct, as applicable. Violations of this Code, as well as any related policies, processes and procedures or issued instructions or guidelines shall not be tolerated and may result in consequences, including disciplinary process up to and including termination of employment, contract or mandate.

### What is expected of me as a Catella representative?

As a representative of Catella, you shall read, understand, and comply with the Code, Catella Group policies, processes and procedures, instructions and guidelines, as well as all relevant local policies, guidelines, laws and regulations.

You shall always act transparently in your decision-making, and shall never use your position, company assets or business opportunities for personal gain.

You are encouraged to speak up and report any concerns or violations of the Code or other governing documents. If you are unsure about the appropriate course of action, you should always consult your manager, local MD, the ethics hotline or use our whistleblower function. Ensuring that you feel safe and supported when raising concerns is a priority for the Catella Group.

### What is expected of me as a manager?

In addition to the expectations outlined above, you shall lead by example and promote a culture of openness and integrity, in alignment with our values. Your team should feel comfortable raising concerns and you should encourage open discussions about the Code and its relevance to their work.

You should actively 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.

## 2. 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, victimisation, 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 CFO, or read the Sustainability Policy.

## 3. 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 uphold international human and labour rights standards, and strictly prohibit the use of child or forced labour.

We want our business to reflect the diversity of the societies in which we operate. Most importantly, we don't discriminate based on ethnic or social background, religious belief, political opinion, union affiliation, sexual orientation, disability, family status, gender, age or any other forms of discrimination covered by EU regulation or national law. We firmly believe that diversity and inclusion strengthens our business and employer brand, providing a competitive advantage. Everyone should have the opportunity to thrive based on their competence, experience, and performance.

We are committed to ensuring that every individual is valued and has equal access to fair working conditions, benefits, and career development opportunities, including training, education and promotion.

We strive to attract and retain talents across all age groups. Work-life balance is important to us, and we do not encourage excessive working hours.

As an equal opportunity employer, we actively support both male and female employees to take parental leave and to share parenting responsibilities with their partners, without any negative impact on their careers.

We are committed to providing a safe and healthy working environment that meets or exceeds established standards. Local working conditions shall comply with all applicable statutory requirements and collective bargaining agreements. Additionally, we fully respect and uphold the right of all employees to engage in collective bargaining.

### How do I do the right thing?

Always treat colleagues with respect, dignity, and courtesy to ensure a workplace that is free of harassment, bullying and discrimination. You shall comply with applicable labour and employment laws as well as our Human Resource Policy.

Treat others like you wish to be treated yourself. Never engage in bullying, victimisation, or any form of discrimination towards anyone, including verbal intimidation or humiliation. As an international organisation, we must be culturally sensitive; what is acceptable in one country may not be so in another.

If you witness or experience inappropriate or unacceptable behaviour in the workplace, please report it to your local HR or manager. If you do not feel comfortable doing so or do not get the necessary support, you may escalate the matter through the ethics hotline or whistleblower function.

#### Treat others like you want to be treated

- We have zero tolerance for any form of discrimination, bullying or harassment.
- We are committed to fostering a diverse workforce that reflects the societies in which we operate.
- All colleagues shall be treated with respect, dignity, and common courtesy.

## 4. Occupational health, safety, and well-being

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 are committed to providing and maintaining a healthy and safe working environment, which includes both physical and psychosocial well-being. Everyone is responsible for looking after their own health, well-being, and safety, by maintaining a healthy work-life balance through the support, tools, and guidelines that we provide.

It is also essential to be aware of safety procedures, such as emergency protocols for fires, and the appropriate personal protective equipment (PPE) required when visiting construction sites. A safe working environment depends on everyone's awareness—report any unsafe situations, but never put yourself in danger while doing so.

Alcohol consumption in work-related settings is reserved for special occasions and must always be in moderation.

Catella maintains a strict **no-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

- 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

## 5. Travelling for work

Health, safety, security, costs, and the environmental impact are all important factors to consider before deciding to travel.

### How do I do the right thing?

Before making any travel arrangements, consider whether virtual collaboration is a suitable alternative. Utilizing modern technology offers several benefits - it reduces our carbon footprint, it is more cost efficient, minimizes work disruption and supports a healthy work-life balance.

Travel should be undertaken when it is necessary. Assess the pros and cons realistically before making a decision.

If travel is required, plan your trip smartly, efficiently, and as environmentally conscious as possible. Keep the travel group small and plan ahead to optimize efficiency.

All business trips shall be booked through the company's designated travel portals for two reasons:

- to enable the measurement of our carbon footprint
- to ensure your own safety by allowing us to locate you in case of emergency.

For security and business continuity reasons, a group of senior managers of the same entity should not travel together on the same flight or similar transportation.

When travelling for work, you represent the Catella Group and shall conduct yourself accordingly. Familiarize yourself with the basic customs and cultural norms of your destination, to ensure respectful behaviour.

Never purchase sexual services while on a business trip, whether during or outside working hours. Alcohol consumption should be moderate during travels and remember that Catella strictly enforces a no-drug policy.

### Only travel if you must

- You represent the company when travelling for business - conduct yourself professionally and respectfully.
- Evaluate the necessity of travel by considering the pros and cons before making arrangements.
- Choose environmentally conscious travel options to minimize the impact on sustainability.

## 6. Business ethics and integrity

Catella Group is committed to conducting business with integrity, honesty, and full compliance with applicable laws and regulations.

### Gifts & Hospitality

We make sure that gifts and hospitality are always appropriate and serve a clear business objective.

#### Defining gifts and hospitality

A gift is defined as the offering or receiving of goods or services. However, a gift becomes a bribe when it is given with the intent to improperly influence business decisions or relationships.

Business entertainment, hospitality, meetings with current or potential customers, suppliers and stakeholders must always align with our Code of Conduct and comply with all applicable laws and regulations.

#### What does this mean for Catella Group?

We always cover our own business travel and accommodation expenses. Never accept gifts or hospitality if they can influence, or appear to influence your and our business decisions.

#### How do I do the right thing?

Hospitality and gifts can complicate business decision-making, so carefully consider the implications before offering or accepting them. Do not offer or accept gifts, travel, payments, or hospitality in exchange for favourable decisions or business advantage. Always rely on your judgement and ethical principles to assess the situation.

In some countries, giving and receiving gifts is a cultural norm, and refusing may be considered impolite. If this applies, gifts should only be exchanged when they can no longer be perceived as influencing business decisions. Any gifts should be modest and proportionate. However, never give gifts to public officials, except for low-value company-branded items.

To ensure clarity and alignment, we should communicate our gift and hospitality policy to our suppliers, customers, and business partners .

#### Where can I find out more?

If you are unsure about the appropriate course of action or have further questions, please speak to your manager, local MD, or use the whistleblower function for guidance.

#### Treasure your independence

- Never offer or accept gifts, travel, payment, or hospitality in exchange for a favourable decision or business advantage.
- We always cover our own business accommodation and travel expenses.
- If in doubt about how to act, always consult your manager before making a decision.

## 7. Conflict of Interest

To ensure that we provide our partners and customers with the best possible service, we make all decisions independently of private interests or conflicting loyalties. We actively avoid or mitigate situations that may create potential or perceived conflict of interest with our activities. Our actions shall always align with the best interest of the entire Catella Group.

### Definition

A **conflict of interest** arises when financial or other personal incentives influence or appear to influence an employee's professional performance or decision-making.

### What does this mean for Catella Group?

Employees must not seek or obtain personal gain from business transactions or non-public information acquired through their work. All tender or procurement decision processes shall be conducted fairly and transparently to uphold integrity and accountability.

### How do I do the right thing?

Always maintain professional business relationships and avoid over-familiarity. Do not give preferential treatment to personal contacts such as family or friends and be mindful of situations that could create suspicion of favouritism.

If you are considering or already serving as a board member, employee, or consultant for an external business, non-profit or other charitable organization, you must obtain approval from your local MD beforehand. While external activities outside your regular job are allowed, inform your MD if they create a potential or perceived conflict of interest.

Do a quick check and ask yourself:

- Could my personal relationship influence business decisions?
- Does my role include decision making authority over family members or close friends?

If these questions raise any concerns, discuss the situation with your manager or local MD to ensure transparency and integrity.

### Where can I find out more?

If you are unsure about the appropriate course of action or have further questions, please speak to your manager, local MD, CLO, or refer to the Anti-Bribery and Corruption Policy or the Policy on Related Party Transactions and Conflicts of Interest for guidance.

#### Always take independent decisions

- Avoid situations that may compromise or appear to compromise, your decision-making.
- Inform your manager if you identify a potential conflict of interest involving yourself or others.
- Do not give preferential treatment to personal contacts, such as friends and family.

## 8. Improper payments

We uphold the highest standards of transparency and integrity across the Group. This ensures that our actions and decisions always serve the best interest of our clients, our business and society.

### Definitions:

- **Corruption** is the misuse of power for private gain, often involving bribery.
- **Bribery** is the offering, giving, authorizing, requesting, or receiving of financial, items of value or other advantage to influence the actions of a person.
- **Financing of corruption** occurs when the payments are made to a third party – such as an agent, partner, vendor, or consultant – who uses them (or part of them) for corrupt activities.
- **Facilitation payments** are payments offered or made to a public official to secure or expedite a process or approval required by a government or public authority.

### What does this mean for Catella Group?

We maintain accurate and transparent financial records, ensuring that all payments are made for legitimate purposes.

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 all forms of bribery, whether direct, indirect or facilitated through a third party. It also extends to facilitation payments and any financial transactions that could encourage or lead to corruption.

### How do I do the right thing?

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

Always exercise caution when engaging with third parties, such as clients, lobbyists, agencies, and consultants. If you become aware of potential corruption or bribery, report it immediately to your manager, local MD, or use the whistleblower function.

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 local MD. You will be fully supported in handling the situation.

When dealing with public or government officials, especially in regions where the facilitation payments are common, ensure your documents are complete and well-prepared. This minimizes the possibility of being asked for additional payments.

### Where can I find out more?

If you are unsure about the appropriate course of action or have further questions, please speak to your manager, local MD, CLO, or refer to the Anti-Bribery and Corruption Policy or the Anti Money Laundering (AML) and Counter Terrorist Financing (CTF) Policy for guidance.

## 9. Public officials

Engaging with public officials is a key aspect of our business, as they oversee decisions related to city development, permits and other regulatory matters that impact our operations. Therefore, it is essential that we uphold the highest ethical standards when working with public officials or individuals with political ties, ensuring transparency, integrity, and compliance in all interactions.

### Definitions:

A public official or a person with political ties includes:

- 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 aim to protect our employees and the company from potential conflicts of interest and corruption.

When engaging with public officials, it is essential to consider proportionality, and act in an ethical and appropriate manner. While customary coffee and meals during business-related meetings or events are acceptable for maintaining business relationships, we do not offer gifts or non-business-related entertainment.

All interactions must be part of a legitimate business process, ensuring transparency and integrity in every engagement.

### How do I do the right thing?

Always apply the four-eye principle when meeting public officials. Having a colleague present helps prevent difficult situations and provides confirmation of events.

It is advisable to prepare 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 and only if permitted by local law or the recipient's code of conduct. Always refer to the Anti-Bribery and Corruption Policy,

### Where can I find out more?

If you are unsure about the appropriate course of action or have further questions, please speak to your manager, local MD, CLO, or refer to the Anti-Bribery and Corruption Policy.

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

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

## 10. Company information – information security, privacy and data protection

### Definition

Non-public information means internal, confidential, or proprietary information that is not intended for public disclosure.

## What does this mean for Catella Group?

We are committed to protecting our information by ensuring its integrity, confidentiality, and availability at all times.

As part of our work, we may have access to non-public information related to our operations including financial data, business plans, contracts, and customer or supplier details. This information must be safeguarded from improper use and not shared, even with colleagues, unless properly authorized.

**Integrity** means ensuring that information is accurate, complete and reliable. Everyone has the fundamental right to privacy, and we protect all personal data entrusted to us by complying with all applicable data protection laws and regulations wherever we operate.

**Confidentiality** means preventing information from being accessed by unauthorized individuals. We only collect, access, or process personal data when it is necessary for business purposes, and only use it for its intended purpose.

**Availability** means ensuring that information is accessible and usable when needed to support business operations.

## How do I do the right thing?

Only use company information for work-related purposes. Do not disclose or publish any company information – leave all external communication and publication to the Communications and Investor Relations team.

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

Protect company information from accidental or unauthorized disclosure or misuse, especially when handling information outside your workplace such as when travelling or working in public spaces.

Be mindful that telephone calls can be overheard and documents can be forgotten in public. When working in a public area, use a privacy filter on your computer or request one from your IT department.

Keep your desk clean and ensure sensitive information is not left in printers or unattended.

Only use company-approved equipment, services, and software. Follow the guidelines and terms established for the Catella Group and/or your local IT.

Protect yourself and the company from cyber risks. The Catella Group conducts regular cyber awareness trainings to help mitigate threats. Do not open suspicious or unexpected emails and never click on links unless you are certain they are safe.

The use of adult content or gambling sites on company devices is strictly prohibited.

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

Use company email, corporate communication platforms, internet connectivity and devices only for legitimate and authorised business purposes. Limited private usage is permitted as long as it does not interfere with work or contradict this Code or company policies.

When leaving the Group, it is time to return all company assets in your possession. After your departure, confidential information remains confidential and must not be disclosed.

### Where can I find out more?

If you are unsure about the appropriate course of action or have further questions, please reach out to our CDO or CLO. You can also speak to your local IT, manager, or local MD, or refer to the Data Privacy Policy, the IT Policy or the Acceptable Use Policy for guidance.

## 11. Artificial Intelligence (AI)

Appropriate use of artificial intelligence (“AI”) offers significant benefits, including improved efficiency through streamlined workflows and reduced risk of human error. At the same time, the use of AI entails certain risks, including, among other things, concerns relating to security, reliability, personal data protection, and intellectual property rights. Catella Group employees shall consult procedures for acceptable and responsible use of AI to ensure responsible, compliant, and value-creating use of AI and to safeguard the business against unacceptable risks.

## 12. Communications & media relations

We communicate openly, transparently and in alignment with our values. By maintaining consistency in our messaging, we aim to build and uphold a strong public brand image that supports our business activities.

### What does this mean for Catella Group?

All communication should be open, transparent, relevant, and considerate of the recipient. We provide information in accordance with local laws, as well as the rules and regulations governing listed companies. The Catella Group has dedicated communications specialists who serve as official representatives of the company.

Our brand is one of the most valuable assets, and we must protect and safeguard its identity, values and its visual representation. Professional communication should always enhance knowledge and trust in our brand and the Group.

Each company within the Catella Group has appointed spokespersons authorized to communicate within their area of responsibility. Regarding financial information for both the entities and the group, only the CEO, the CFO and Head of Marketing and Communications are designated as spokespersons.

We do not support any political organization or party. However, we may issue statements on matters relevant to the Catella Group, that could be interpreted as political. Such statements must always be factual and transparent, and made in consultation with the Executive Management Group.

### How do I do the right thing?

Act responsibly online and use common sense when mentioning or referring to Catella and the Catella brand. You are personally responsible for the content you publish.

Always review what you have written. If you are unsure or feel uncomfortable about sharing a certain information, seek advice from a communications colleague or your manager, or choose not to share it.

Never disclose non-public information, including revenues, upcoming products or services, financial results, or any other confidential details.

While we operate as a Group, each company within the Catella Group is also an individual entity. Before sharing internal information, consider whether it is appropriate for a broader internal audience.

If you receive inquiries from external stakeholders such as the media or investors, refer them to the Communications team or the CFO.

### Where can I find out more?

For more information, please read the Catella Group Communications Policy or reach out to your local or Group communications team.

Think first, then share information.

- Our communication should be proactive, transparent, relevant, and legally compliant.
- Consider the recipient and ensure that the information provided is appropriate an intended for them.
- Act with care and responsibility when sharing information externally or online, ensuring it aligns with company policies and confidentiality requirements.

## 13. Inside Information

As a publicly listed company on a regulated market (Nasdaq Stockholm), we are part of the financial market and must act and behave ethically to uphold its integrity. Therefore, we are committed to maintaining high ethical standards in handling confidential and inside information, ensuring transparency, compliance, and trust in our business practices.

### Definition:

**Inside Information** refers to precise, non-public information that relates directly or indirectly to Catella or its financial instruments and that, if disclosed, would likely have a significant effect on the price of those financial instruments.

### What does it mean for Catella Group?

We take great care to protect confidential business information, especially when it qualifies as Inside Information, ensuring compliance with regulatory requirements and maintaining market integrity.

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

- 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.

### How do I do the right thing?

- Insider dealing, unlawful disclosure of Inside Information and market manipulation is illegal.
- Never reveal confidential information or Inside Information to unauthorized individuals.
- Do not spread rumours or misleading information that could impact market integrity.
- While in possession of Inside Information, you must not engage in any transactions involving the related company's financial instruments (such as buying, selling, or cancelling or amending an order.
- Never encourage or cause anyone else to engage in such transactions based on Inside Information.

### Where can I find out more?

For more information, please refer to the Insider Policy or contact the CFO and/or [insider@catella.com](mailto:insider@catella.com).

## 14. Anti-Money laundering

By adhering to rules, regulations, and standard processes and maintaining transparency in all our financial activities, we ensure that our financial activities are both ethical and legally compliant.

### Definition

**Money laundering** refers to the process by which criminals conceal the origin and ownership of proceeds from criminal conduct, making such proceeds appear to come from a legitimate source.

### What does it mean for Catella Group?

We never engage in transactions that involve unconnected parties, unusual payment methods or abnormal terms and conditions.

When interacting with current or potential customers, clients or suppliers, we maintain a professional and non-extravagant approach. To ensure the legitimacy of these engagements, we conduct Know Your Customer (KYC) checks and due diligence assessments to ensure the legitimacy of the above-mentioned.

### How do I do the right thing?

Conduct all transactions and financial activities with full transparency and in accordance with standard processes.

Always report suspicious transactions and any potential or actual money laundering.

Perform due diligence and KYC checks on third parties before entering a business deal.

If you suspect any wrongdoing, report it immediately through the whistleblower function.

### Where can I find out more?

For more information, please contact your local MD, local finance team, CFO, and refer to the Anti-Bribery and Corruption Policy or Anti Money Laundering (AML) and Counter Terrorist Financing (CTF) Policy for guidance.

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

- We conduct due diligence on third parties before entering a business deal.
- We perform KYC (know your customer) before establishing a business relationship.
- We ensure all financial activities are transparent and ethical.
- We do not engage in transactions that involve unconnected parties, unusual payment methods or abnormal terms and conditions.

## 15. Sponsorships and donations

Sponsorships and donations can be valuable tools for business development and community support. These initiatives should be aligned with our ESG ambitions and objectives, ensuring they contribute to our business goals and create long-term value for both our company and the societies in which we operate.

### What does it mean for Catella Group?

All sponsorship and donations must align with our ESG and business strategy, ensuring that we support consistent and meaningful causes over time.

Always assess potential sponsorships and donations against a reputation and corruption risk profile to mitigate risks.

Support or donations must be disconnected from ongoing business deals. They cannot be connected to political support, political payment, or bribery.

We do not support individuals, organizations or activities that conflict with our ethical standards. We do not support activities or organizations that have a negative environmental impact.

### How do I do the right thing?

Plan all sponsorships and donations activities carefully in collaboration with your PR & communications team and ESG contacts.

Ensure that the support can be communicated publicly without reputational risk.

Track the recipients' use of sponsorship funds and measure it against agreed targets.

Conduct a due diligence process when assessing potential recipients to ensure alignment with our ethical standards and ESG commitments.

### Where can I find out more?

For more information, please reach out to your local MD or Head of Marketing and Communications.

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

- Ensure all sponsorships and donations align with our ESG commitments and business strategy.
- Do not give preferential treatment to personal contacts when selecting recipients.
- Avoid situations that could compromise your decision-making or create conflicts of interest.

## 16. Whistleblowing

We strive to foster a culture of openness where we support each other's well-being and act in the best interests of the Group.

### What does this mean for Catella Group?

Integrity, transparency, and openness are fundamental to our culture. Most importantly, we strive to create an environment where everyone feels safe and reassured that they can raise concerns without fear of retaliation, whether through their management or anonymously via the whistleblowing function. If you do not feel comfortable raising an issue with your manager or local MD, you can use the whistleblowing reporting function (2Secure) or other applicable reporting channels.

### How do I do the right thing?

If you know of or suspect a reportable breach – please report it.

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

- Act quickly if you know of or suspect a reportable breach
- Whistleblowers are protected against reprisals, we have a zero-tolerance policy for retaliation
- Whistleblowers will be will be safeguarded when reporting concerns
- All matters are taken seriously and handled with the utmost care and professionalism

### What can be reported?

Information, that has been acquired in a work-related context, regarding:

- actual or potential breaches, which have occurred or are very likely to occur in the organisation, as well as attempts to conceal such breaches;
- irregularities in the Catella organisation of which the disclosure is of public interest; or
- any other matter that qualifies as a whistleblowing matter under the local implementation of the Whistleblower Protection Directive in the relevant jurisdiction.

Such information may include, but is not limited to, financial crime such as corruption and bribery, conflicts of interest, systematic regulatory breaches, misuse of public funds, serious public safety risks, crimes against humanity, endangerment of employee lives as well as environmental crimes or

offences. You will not be required to have evidence for your suspicions, but no accusations may be made with malicious intent or in the knowledge that the accusation is false.

### How do I file a whistleblower report?

Internal reports may be filed via local management and/or the CHRO or the independent internal reporting via 2Secure (anonymously). External reports (to authorities or public disclosure) may be filed in accordance with applicable law and regulations. More information on how to file a report is available in the Whistleblowing Policy.

To safeguard your anonymity, the whistleblowing function is provided by an external and independent provider (2Secure). The reporting channel is both encrypted and password protected, ensuring confidentiality. You are not required to provide your identity but providing your name may help with follow ups and further investigation. Rest assured that your identity always will be treated confidentially.

1. You do not need to provide proof of your suspicion, but all reports must be made in good faith - malicious or knowingly false accusation are not acceptable.
2. Include all relevant facts in the case, including those you believe to be minor or unimportant.
3. Please carefully structure your report and attach any supporting documents that could help the investigation.

Submit your report here [Whistleblowing - Home \(2secure.se\)](#) 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 submitted through the whistleblowing function will be received and handled by 2Secure, an independent provider with extensive experience of investigations and global capacity, if needed. Your anonymity is protected unless you choose to disclose your identity. You can also choose to remain anonymous within 2Secure ensuring an extra layer of confidentiality. 2secure will work in consultation with Catella's Whistleblower Committee and local representatives, as applicable, to review and address the concerns appropriately.

### Feedback

Rest assured that all reports will be investigated regardless of circumstances. You will receive a confirmation within 7 days of submitting your support. Your case will be reviewed and addressed within 3 months in accordance with established procedures.

### Where can I find out more?

For more information, please contact your local MD, the CHRO, the CLO or refer to the 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 familiarising 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](https://catella.com), while the complete governance framework and its policies are available on the Catella intranet.

Contact Person(s):

CHRO

## 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)
2025-02-10	Version 1.4, minor verbiage adjustments and format corrections, CHRO, Mathias de Maré (mathias.demare@catella.se)
2025-05-20	Version 1.5, updated version CHRO, Mathias de Maré (mathias.demare@catella.se)
2026-05-12	Version 1.6, minor adjustments, CLO, Johanna Björnemyr (Johanna.bjornemyr@catella.com)