

# Catella Group Supplier Code of Conduct

## 1. We take responsible business seriously

It is important for the Catella Group<sup>1</sup> to develop and maintain strong business relationships with partners and suppliers who are committed to similar ethical standards. Our supplier Code of Conduct sets clear standards and expectations with which we expect all companies providing products and/or services to any Catella Group companies (“**Suppliers**”) to comply with. This includes Suppliers’ employees, consultants, and subcontractors.

We expect Suppliers to monitor their compliance with this Code on a regular basis. If requested, Suppliers shall provide Catella Group with relevant information and/or data to verify its compliance. Failure to comply with the standards and expectations set out in this Code may result in Catella Group reviewing and potentially ending the relationship with the Supplier.

## 2. Our commitment to responsible business conduct

Being a responsible business means respecting and supporting international standards on human rights, labour conditions, the environment, anti-corruption, and governance. We have chosen to follow several international declarations, conventions, standards, and guidelines. These include the United Nations’ Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Principles for Responsible Investment (UNPRI), the OECD Guidelines for Multinational Enterprises, the UN Global Compact, and the Fundamental Conventions of the International Labour Organization (ILO). We respect 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; (b) 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 the Catella Group is proven to have caused or contributed adverse impacts on individuals, workers, and communities, we commit to remediation through legitimate processes, as considered appropriate.

## 3. Complying with applicable laws

We are committed to being compliant with applicable laws and regulations and we expect the same from our Suppliers. Where local laws and regulations are stricter and do not stand in conflict with each other, the highest standard shall apply.

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<sup>1</sup> Catella Group means Catella AB, reg. no 556079-1419, and all its subsidiaries and affiliated companies.

#### Human rights and fair working conditions

We expect our Suppliers to uphold and comply with internationally recognised human and labour rights, as set out in the UN Guiding Principles on Business and Human Rights and the ILO Core Conventions. This includes a strict prohibition of all forms of human trafficking, modern slavery, forced, bonded or indentured labour, and any work performed under threat, coercion, deception or abuse of power. All work must be carried out on a voluntary basis.

Working weeks are not to exceed the maximum set out by local law. Compensation paid to workers shall comply with applicable wage laws, including minimum wage, overtime, and legally mandated benefits.

Suppliers must respect workers' right to associate freely and to communicate openly regarding working conditions without fear of reprisal, intimidation, or harassment. Workers shall have the right to join unions and seek representation in accordance with local law.

#### Child labour

Child labour is not tolerated. According to Article 1 of the UN Convention on the Rights of the Child, a child means every human below the age of 18 unless local applicable law states otherwise. Work that is dangerous or harmful to the health, safety or social and mental development of children must not occur. Work shall not prevent children from going to school. Employees under the age of 18 must be protected from dangerous work tasks that pose risks to health and safety, such as night work. Specific regulations and requirements and/or applicable collective agreements with reference to employees under the age of 18 must be complied with.

#### Health and safety

Suppliers shall ensure a healthy and safe working environment in accordance with internationally recognised standards. Suppliers shall use their best efforts to prevent hazards and take precautionary measures to prevent accidents and occupational risks. Suppliers shall ensure that workers receive adequate and regular health and safety training. This includes ensuring that suppliers have procedures in place for emergency situations, and that such situations are handled in a way that minimises harm to life, the environment, and property.

#### Diversity, equality, inclusion, and non-discrimination

Suppliers shall recognise and uphold the human rights of workers. We do not tolerate any form of bullying, harassment, or discrimination. We expect Suppliers to have fair hiring and employment practices. They shall ensure that no discrimination takes place based on ethical or social background, religious belief, political opinion, union affiliation, sexual orientation, disability, family status, gender, or age.

#### Business Ethics & Governance

The Catella Group is committed to conducting business with integrity, honesty, and legal compliance. Furthermore, we believe in fair and transparent competition. We expect the same of our Suppliers.

We consider improper payments to include the definitions below:

- Corruption is the abuse of power for private gain, typically involving bribery.

- Bribery is the offering, giving, authorising, requesting, or receiving of financial or other advantages, items of value, or benefits, as a means of influencing the actions of a person.
- Financing of corruption is a payment made to a third party, such as an agent, partner, vendor, or consultant, who uses it (or part of it) for 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 authority.

Suppliers shall ensure that they or any associated persons do not engage in any form of improper payments.

#### Gifts & hospitality

Suppliers shall ensure that gifts and hospitality are reasonable and always support a clear business objective. They may never be used to influence or sway a business relationship and/or decision.

#### Conflict of Interest

The Supplier shall ensure that decisions are taken independently of private interests or divided loyalties. We expect Suppliers to inform us if a situation arises that could involve a conflict of interest affecting the Catella Group.

#### 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. We therefore hold ourselves to high ethical standards when working with public officials or people with political ties and expect the same of our Suppliers.

#### Anti-money laundering (AML) and Counter Terrorist Financing (CTF)

Money laundering and terrorist financing are activities that threaten the integrity and stability of the international financial system. Catella Group and its Suppliers are responsible to prevent them from being used to facilitate the movement of criminal proceeds or the transfer of funds destined to finance terrorism. Suppliers shall be committed to identifying and managing the money laundering and terrorist financing risks that they are exposed to, and to take the proportionate measures required to manage these risks across all jurisdictions in which it operates.

#### Confidentiality

We expect our Suppliers to treat our agreements and information with a high degree of care and confidentiality.

#### Environment

We only have one planet, and we, as a company and as individuals, need to look after it. We are the sustainable investment partner, together building the link between property and capital, and as such we have a strong impact on the environment. We need to take responsibility for tracking and measuring our carbon footprint, as well as complying with current and relevant EU legislation. We expect the same of our Suppliers, and we expect that we collaborate on finding the best solutions together, including how to meet environmental legislation and requirements. Suppliers shall

continuously prevent and mitigate climate and environmental risks, as well as identify opportunities for improvement and change, and contribute to sustainable social development in general.

#### Privacy, information, and data protection

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

We expect our Suppliers to do the same, respecting the right to privacy and handling personal data and confidential information responsibly.

Suppliers shall comply with applicable data protection laws and regulations when personal data and information are collected, stored, processed, or transferred. We also expect our Suppliers to safeguard confidential information from unauthorised disclosure or misuse.

#### Artificial intelligence

Artificial intelligence can deliver significant value, but it also entails legal, ethical and operational responsibilities. We expect that any use of artificial intelligence in connection with the provision of services is handled in a responsible, transparent and lawful manner. Suppliers shall ensure that any artificial intelligence systems used are developed, deployed and used in compliance with Regulation (EU) 2024/1689 laying down harmonised rules on artificial intelligence (the Artificial Intelligence Act). This includes, where applicable, meeting requirements relating to transparency, risk management and ongoing compliance. We expect Suppliers to take responsibility for the responsible use of artificial intelligence and to collaborate with us to ensure that applicable legal and regulatory requirements are met.

#### 4. How to report a concern – Whistleblower function

We want to encourage a culture of openness where we look after each other's well-being and the interests of the Catella Group and our Suppliers. A suspected breach of this Code, laws or regulations is expected to be reported. An anonymous report can be filed through the whistleblower function which is available through the Catella website.

If something seems suspicious or does not feel right, report it.

- Act swiftly 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

#### *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, please note that it is easier to investigate and follow up on the issue you are reporting if you do share who you are. Rest assured that your identity will always be treated confidentially.

You do not need to have proof of your suspicion, but accusations must be made without malicious intent and without knowledge that the accusation is false. It is important that you describe all facts in

the case, including circumstances that you believe are less important. Please prepare your statement carefully and attach anything that could be relevant.

Submit your whistleblower here: [Whistleblowing - Home \(2secure.se\)](https://wb.2secure.se/wbui/) 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 will receive 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 remain anonymous unless you approve otherwise. You can also choose to remain anonymous within 2Secure. They will work in consultation with Catella’s Whistleblower Committee.

*Feedback*

Rest assured that all reports will be investigated. You will receive a confirmation within seven days, and your case will be dealt with within three months.

More information is available in the Whistleblower Policy available on our website.

Questions & Guidance

Should our Suppliers have any questions or concerns about the Supplier Code of Conduct, they can reach out to their local entity contact.

Contact person(s):

CFO

## Revisions

DATE:	VERSION, CHANGES MADE AND NAME OF PERSON WHO MADE THEM
2023-08-17	Version 1.0, Created policy, Head of ESG
2024-05-22	Version 1.1, New contact person, Shauna Mehl, Head of ESG (shauna.mehl@catella-investment.com)
2025-05-20	Version 1.2, Clarifying Our Position on Human Trafficking, Matilda Garstedt, Head of Group Accounting and ESG reporting
2026-05-12	Version 1.3, New paragraph relating to AI usage, Gustav Jansson, CFO (Gustav.jansson@catella.com)



We, a Supplier of the Catella Group, hereby confirm that we have received, read, and understood the Catella Group Supplier Code of Conduct and agree to comply with its contents, as amended from time to time.

Supplier name:

Place:

Date:

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By: