

# Code of Conduct

*Concerns REMONDIS Maintenance & Services Sweden AB and its subsidiaries*

The goal of the REMONDIS Group is to enjoy sustainable growth. We believe that this is only possible if all legal and ethical requirements are fully complied with. The only way for our company to assert itself against its competitors is to adhere strictly to our Corporate Compliance Guidelines, regardless of the market in which the company operates. It is therefore extremely important that all employees act in a responsible manner in accordance with these business principles. The behaviour and conduct of employees affect both customers and the company's sustainability efforts in all areas.

The Code of Conduct is based, among other things, on the REMONDIS Group's business ethics principles, which are set out in the brochure Corporate Compliance. These principles apply to everyone in the REMONDIS Group and are summarized in this Code of Conduct. We also follow Byggföretagens [Code of Conduct](#), as members of that organization; and relevant parts of that Code are incorporated in both this Code of Conduct and the Business and Sustainability Policy.

This Code of Conduct describes how we should act and behave in our everyday work. All employees are responsible for complying with this Code of Conduct and are expected to live by it, to act in accordance with the company's values and guidelines, and to take personal responsibility for maintaining trust in REMONDIS and its respective brands. REMONDIS Maintenance & Services Sweden AB and its subsidiaries, hereinafter referred to as the Company, is part of the REMONDIS Group.

The Company complies with relevant legislation, respects the ten principles of the UN Global Compact\* and works to ensure that these principles are promoted in the societies and environments in which the group operates. The Company is certified in accordance with the ISO standards for quality, environmental, and health and safety management systems.

The Code of Conduct consists of the following sections: The Code applies to all; Business ethics principles (Fair competition, Integrity in business dealings, Focus on the good of the company, Cooperation and transparency with authorities and others); Respect for human rights and fair working conditions; Working environment and safety; We reduce our environmental impact; Protection of property, information and personal data; Compliance and reporting.

\* [www.unglobalcompact.org](http://www.unglobalcompact.org)

## The Code applies to all

This Code of Conduct applies to everyone who works for REMONDIS Maintenance & Services Sweden AB and its subsidiaries, i.e. board members and employees as well as subcontracted staff and other contractors who can be equated with employees. All of us are responsible for adhering to the Code of Conduct and the laws, regulations and other internal governing documents relevant to our tasks; and for following these guidelines in our daily work. In case of any doubt, guidance should be sought from a manager or support function.

We undertake to act responsibly in accordance with the Code of Conduct and to conduct ourselves in a manner that does not damage the reputation of the industry. Managers and other senior executives are responsible for setting an example and ensuring that employees receive the training they need to understand the Code of Conduct and related policies and directives. It is also important for managers to foster an open environment in which employees can report suspicions of wrongdoing, violations and incidents without risk of retaliation. Violation of the Code of Conduct will be considered serious and may result in disciplinary action, for example.

We use the Code of Conduct as a tool in our daily work and inform customers and other stakeholders about it. For further information and development of the Code of Conduct, please refer primarily to the REMONDIS Group's Corporate Compliance Guidelines and other guiding documents within the Compliance program.

The Code of Conduct has an individual perspective in the sense that each of us working in the company is individually responsible for acting ethically, in accordance with the Code. Our Business and Sustainability Policy, which has a business perspective, sets out further requirements for how we will conduct the company's business in a sustainable manner.

We have also developed our specific Supplier Code of Conduct, which translates relevant requirements of this Code of Conduct in relation to suppliers and the supply chain.

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## Business ethics principles

### Fair competition

#### - No illegal cartel agreements!

The REMONDIS Group operates in a way that is fully committed to free markets. Competition law plays an important part in protecting fair competition and preventing distortion of competition in the market.

For us, this means:

- We reject any activity in our own business and on the market that risks distorting competition. In the case of agreements signed with competitors, the Legal department must always be consulted.
- We do not participate in anti-competitive cooperation between competitors, such as bidding agreements in tenders, price agreements, market share agreements, allocation of customers and markets, or capacity agreements. This also applies to informal discussions and “gentlemen's agreements”.
- We do not engage in any conduct that may constitute an abuse of a dominant market position.
- We act immediately if we detect behaviour that threatens to distort competition.

### Integrity in business dealings

#### - No to corruption!

The REMONDIS Group has a zero-tolerance policy on corruption. Corruption undermines fair competition and damages both the company's business and its reputation.

For us, this means:

- We work systematically to discourage and actively prevent all types of corruption.
- We act objectively and do not put ourselves in situations where we risk being guilty of corruption activities.
- We never try to influence business partners in an undue way, be it through special treatment, gifts or other benefits.
- We ensure that we do not use cash or cheques as a means of payment, and we follow internal governing documents on payment transactions. We have control over and documentation of who we buy from and sell to.
- We do not accept any private benefits in business relationships.
- We practice responsible financial accounting.
- We follow internal delegation and attestation rules and our internal rules on donations and sponsoring.
- We base our recruitment and promotion decisions solely on qualifications and work performance.

### Focus on the good of the company

#### - No conflicts of interest!

All employees must always keep their private interests separate from those of the company. All potential conflicts of interest should be raised with the immediate manager.

For us, this means:

- We avoid situations where there is a risk of conflict between the company's interests and private interests and, on our own initiative, we avoid situations where we may have such an interest in the matter that our impartiality may be questioned.

- We base all business relationships with external parties on objective criteria, such as price, quality, reliability, technology and suitability.
- We are responsible for ensuring that employees do not use the company's services for private purposes, and we do not use company property or resources for private purposes without the express approval of the manager.
- We recruit new employees based on objective criteria and all secondary employment must be approved by the manager. We also contact our manager if we or our close relatives establish a business relationship with companies within the group.
- We refrain from entering into business relationships with contractors of the company as private individuals without prior approval from our manager.
- We respect the fact that the opinions we express as private individuals may in some cases be perceived as the opinion of the company.

## Cooperation and transparency with authorities and others

### - No to withholding or providing false information!

The company seeks to maintain a constructive relationship with all relevant authorities while safeguarding our own interests and rights.

For us, this means:

- We are responsible for ensuring that information provided to authorities, insurance companies, certification companies, financial institutions and similar stakeholders is complete, accurate and understandable.
- We cooperate fully with authorities, acting transparently and making information available punctually.
- We seek guidance from internal support functions on issues related to access and authorization for handling files and information; and we always contact the Legal department in case of contact with police and judicial authorities.

## Respect for human rights and fair working conditions

### - No compromises!

Our company respects human rights and the labour laws of other countries – without exception.

For us this means:

- We do not accept any form of forced labour or child labour and do not buy products or services directly or indirectly produced with child labour; and we avoid doing business with companies that violate the International Labour Organization (ILO) guidelines on child labour.
- We comply with the minimum legal age for employment as determined by each country or set out in collective bargaining agreements; provided that this age is not below the minimum working age prescribed by the ILO.
- We promote equal opportunities and equal treatment of employees.
- We do not accept any form of discrimination based on racial or ethnic origins, gender, transgender identity or expression, religion or belief, disability, age or sexual orientation.
- We act vigorously against discriminatory treatment, harassment, threats and violence.
- We respect freedom of association and apply collective agreements. We demand a living wage for hired staff and suppliers, as well as collective agreement-like conditions, for example regarding working hours and pensions.
- Recruitment and promotion decisions are made only on the basis of objective qualifications and performance.

## Working environment and safety

A safe, secure and good working environment is part of our daily work.

For us, this means:

- We work actively with systematic work environment management; and we contribute to a safe, secure and good working environment, which also includes a good psychosocial working environment.
- We are aware of the occupational health and safety risks that exist in our daily work and have knowledge of the measures we can take to prevent them.
- We are responsible for ensuring that our own work is carried out as directed and that the necessary protective equipment is used.
- We take action if we discover deficiencies in the working environment; we stop work that cannot be carried out safely and inform the immediate superior.
- We are rested, sober and drug-free at the workplace and in good health to perform our duties safely. We are responsible for taking breaks and use holidays for recovery in order to be able to work.
- We always work safely or not at all!

## We reduce our environmental impact

Based on the REMONDIS Group's motto "working for the future", we conduct innovative and systematic environmental work that contributes to efficiency and sustainability. In accordance with the precautionary principle, we use risk assessments to enable us to take early measures to minimize negative impacts on human health and the environment.

For us, this means:

- We take responsibility for our resources and our own environmental choices in carrying out our work; we work to eliminate chemicals that are hazardous to health and the environment from our operations (the "substitution principle").
- We are committed to the sustainable management of resources and the climate impact of the workplace.
- We work to actively contribute to reducing the climate and environmental impact of our operations, both on customers and on society at large.
- We consider climate impact and other sustainability aspects when we travel and have business meetings.

## Protection of property, information and personal data

The Company takes care of its property and takes measures to protect all the company's tangible and intangible assets, and those of our business partners, from damage, loss, intrusion, theft and misuse. We safeguard personal privacy and everyone's right to have their personal data processed in a secure manner.

For us, this means:

- We securely protect property owned by the Company or our stakeholders, both tangible and intangible, and hold appropriate permits, equipment and insurance.
- We comply with applicable data protection regulations and have internal procedures in place to comply with data subjects' rights.
- We actively pursue information security, have procedures for accessing and authorizing data, and comply with agreements and regulations on confidentiality and professional secrecy.

- We prevent information about the Company and our business partners from being disclosed to unauthorized persons to the detriment of the company, its business partners or its employees. This applies both during the term of the contract and after completion of the assignment.

## Compliance and reporting

It is important that all irregularities and misconduct are reported so that we can work proactively and take action. We therefore ensure that multiple reporting channels are available, and work systematically to ensure that wrongdoing is reported. We handle discrepancies and complaints promptly. The company is responsible for ensuring that no employee is penalised as a result of reporting a suspected breach of the Code of Conduct in good faith.

Deviations from this Code of Conduct may be reported to the immediate supervisor or other manager in the business, or to HR or the Legal department / Compliance Officer. Employees may also contact their safety representative or union representative. Also employees always have the right to exercise their freedom of communication under the law.

Suspicious of serious misconduct may also be reported openly or anonymously to the companies' whistleblowing service, Qnister Whistle, via the companies' websites, or by leaving a message on the answering machine at the Qnister Whistle Hotline: 010-214 63 11.

Reports received will be investigated by the companies' Independent Ethics Committee and, if necessary, by external counsel.