

Business Ethics Policy Atrium Ljungberg AB

(Resolved at the Board meeting on 20 May 2021)

Atrium Ljungberg creates sustainable and attractive environments where people want to live, work and be – today and tomorrow. A value-governed organisation with motivated employees and close collaboration with our stakeholders forms the basis for achieving this.

Purpose and goal

This policy is our Code of Conduct, setting out the behaviour that is expected of Atrium Ljungberg’s employees and describing what we can expect from Atrium Ljungberg. They are guidelines to ensure that we all act properly in our relationships with each other, our customers, our partners and society as a whole. Atrium Ljungberg is to be seen as an honest and trustworthy company, whose operations reflect long-termism, collaboration, reliability and innovative thinking.

The Code of Conduct applies to all Atrium Ljungberg employees and all our subsidiaries. When the words ‘Atrium Ljungberg’ and ‘company’ are used in this document, they refer to all of these units.

The Code of Conduct also applies to temporary employees, for example, contractors or consultants who represent the company. They are collectively known as ‘employees’ or ‘we’.

Responsibility and governance

Atrium Ljungberg’s Board of Directors adopts the company’s Business Ethics Policy. It is the CEO and Board of Directors of each subsidiary who are ultimately responsible for ensuring compliance with the Code of Conduct. The managers must lead by example and are expected to discuss the content in this code in their teams and create a work environment where employees feel safe to speak up and discuss problems linked to the code. The managers are also responsible for ensuring that all employees receive regular training in the Code of Conduct.

It is the responsibility of every employee to act in accordance with the Code of Conduct and to ask for support from their line manager for any issues related to its application. There are policies and detailed instructions that supplement the Code of Conduct, which provide additional guidance.

Laws and ordinances

Everyone who acts on behalf of Atrium Ljungberg must comply with the laws and rules that govern its operations; this is the minimum required for each section of the Code of Conduct. Atrium Ljungberg has signed and supports the UN’s Global Compact. As well as complying with legislation, we also undertake to observe and promote international conventions and standards for human rights, the work environment, working conditions, the environment and anti-corruption.

Business ethics

Employees must act in an honest way and with care, commitment and integrity to business partners and other employees.

- We must be responsible for what we say and do. We must comply with any agreements that we enter into and make sure that they are applied correctly.
- We must not use our position to acquire any personal benefits.
- Bribes must never be given or received as part of Atrium Ljungberg's business relationships.
- Openness and moderation must be shown when organising entertainment or giving and receiving gifts, and there must always be a natural link with the business relationship.
- Competitive tendering is always used if this is commercially justified based on our Purchasing Guidelines.
- All orders and deliveries are secured in terms of price and quality in accordance with the company's directives/guidelines.
- We make business decisions in the best interests of the Group and not based on individual considerations or relationships.
- Employees must not pursue any outside activities that would create a conflict of interests.
- We do not tolerate any employees participating in activities linked to sexual exploitation, either during business trips or for entertainment purposes.

Employees

Atrium Ljungberg provides safe employment and adopts a proactive approach to health and safety. We continually improve our awareness, competence and knowledge in this area. We always work safely and help our colleagues prevent unhealthy and unsafe situations. No-one is ever allowed to be under the influence of alcohol or other drugs at the workplace.

We believe that diversity enriches our operations and our approach is to treat all current and potential employees fairly and without prejudice. Everyone, irrespective of sex, transgender identity or expression, ethnicity, age, disability, religion or sexual orientation, must have equal opportunities for employment, development and promotion within the company. No harassment, bullying or threats of any kind are tolerated.

We respect our employees' right to engage in trade unions and be represented by them.

Environment

Atrium Ljungberg is to be at the forefront of environmental performance in our industry and we take the initiative to strengthen environmental awareness. Our employees play an important role in identifying, measuring and monitoring our significant environmental impact, and act to minimise our negative environmental impact.

Information security and privacy

We value open communication, while protecting our trade secrets. Information relating to our operations and the operations of our partners may only be used for the purposes for which it is intended. Employees who gain access to personal data through their work must comply with the relevant statutory requirements and contractual requirements.

Reporting violations

Employees are encouraged to report any non-compliance with the Code of Conduct to their line manager, to the CEO of their subsidiary or to the General Counsel. Employees who choose to remain anonymous can report non-compliance through Atrium Ljungberg's whistleblowing system. Atrium Ljungberg will not tolerate employees suffering negative consequences from reporting any suspected non-compliance in good faith.

Employees who do not comply with the Code of Conduct

Any actions that violate the Code of Conduct may damage the company's reputation and may result in legal proceedings against the company and its employees. Any violation of the Code of Conduct may also lead to disciplinary action for the employee concerned.

Updates

This policy must be updated annually or whenever it is deemed necessary, and is adopted at an ordinary Board meeting that follows the inaugural meeting.