

## FABEGE'S CODE OF CONDUCT

Our view on responsibilities, relationships and business ethics

Fabege

CREATING THE RIGHT CONDITIONS

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ood relationships, a healthy work environment and good business ethics are critical to our long-term success.

The Code of Conduct presents our view on issues related to human rights, labour practices, the environment, business ethics and communication.

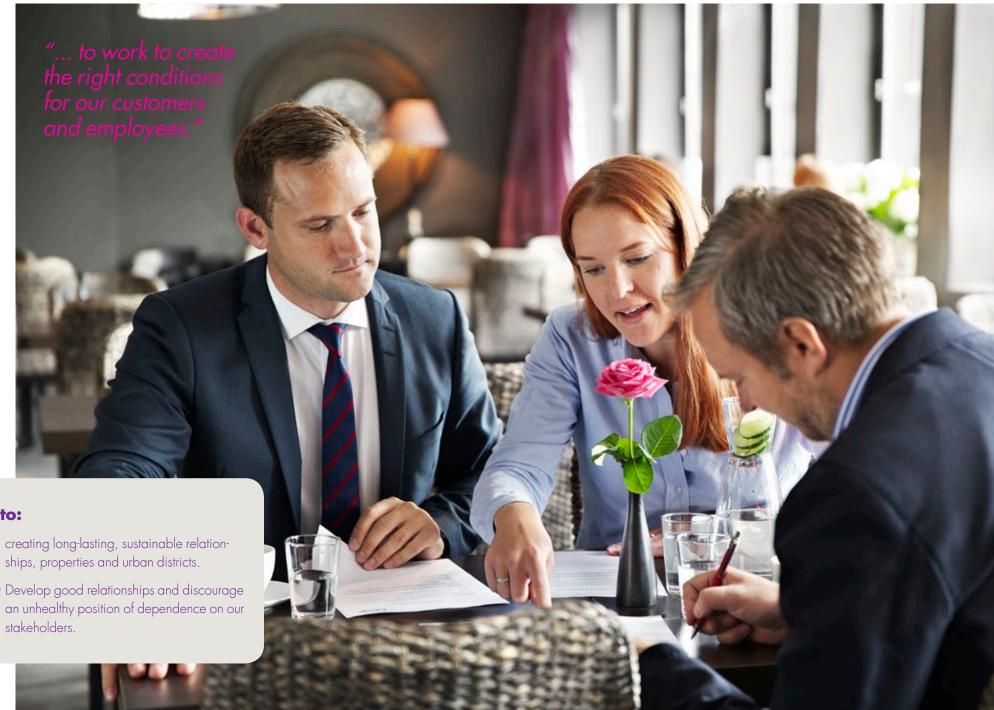
The Code of Conduct encompasses all employees, regardless of their position, and the Board of Directors and Executive Management Team are specifically responsible for facilitating and promoting its implementation. One of our prioritised sustainability targets is continuously to train employees in our Code of Conduct and to maintain meaningful dialogue on ethical issues.

Our Code of Conduct is defined annually by our Board of Directors.

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### Our MISSION

We develop attractive and sustainable urban districts in locations with rail connections We do so for both commercial and humanitarian reasons. Because we know that people who enjoy being at work perform better and stay longer. And that the value both for us and for our customers in attracting, developing and retaining staff cannot be overestimated. As an urban developer and property owner, we therefore take responsibility for both the environment and people's social well-being. We always look at the big picture, where the emphasis is on maintaining the work/life balance, cutting energy consumption and reducing emissions. What we do today should not hinder the opportunities of future generations to cultivate their dreams and desires.



#### Our Code of Conduct is to help us to:

- Ensure our employees have a sense of responsibility and make ethical business decisions of their own accord.
- Promote consensus on what is and is not - acceptable behaviour, with the aim of
- creating long-lasting, sustainable relation-
- Develop good relationships and discourage an unhealthy position of dependence on our stakeholders.

### Who WE ARE

Our core values – known as SPEAK – permeate the entire organisation. In our behaviour toward both colleagues and others, we are to be fast, informal, entrepreneurial, business-minded and customer-focused.

Those suppliers and partners who meet our customers on our behalf must respect, and comply with, our SPEAK values.

Training and skills transfer through SPEAK constitute a continuous process and a natural part of every employee's personal development plan.



### **CLOSE TO** our **CUSTOMERS**

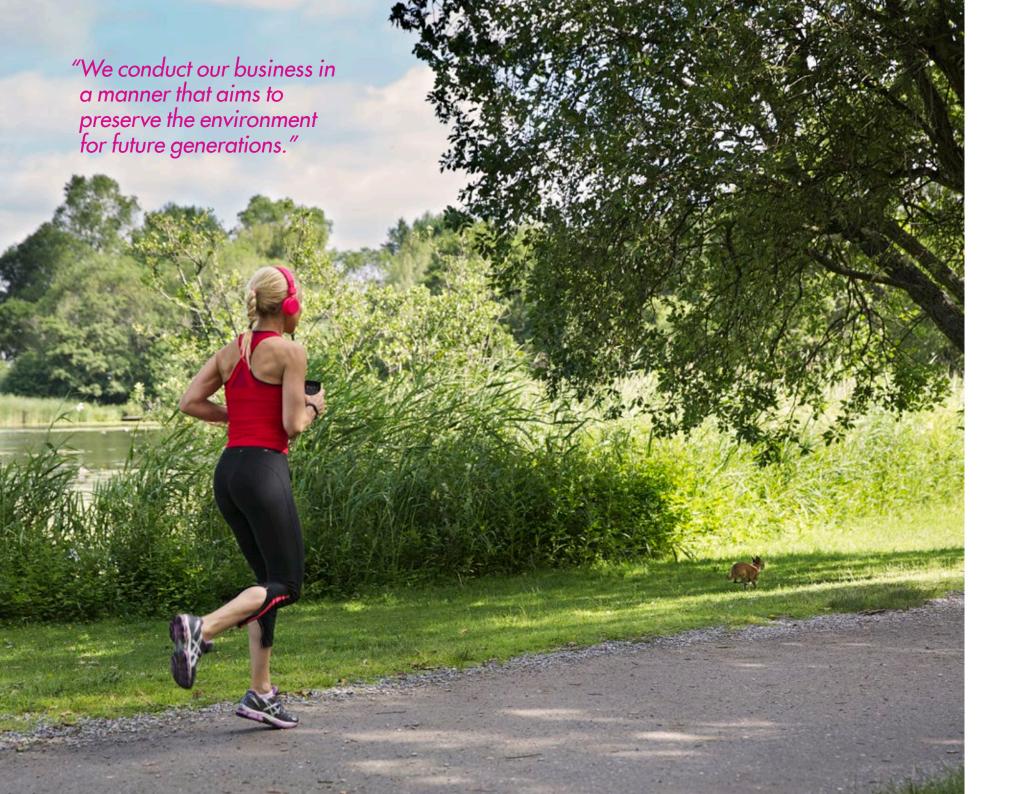
Our customers' success is the reason for our existence. We create the right conditions for our customers to succeed by showing respect for each customer's unique needs and being responsive to their wishes and views. Fabege is to be a reliable partner and initiator.

Wherever we can, we strive to meet – and preferably exceed – customer expectations.

We build trust and long-lasting customer relationships without losing our integrity.

"Fabege is to be a reliable partner and initiator."

"... fast, informal, entrepreneurial, business-minded and customer-focused."



# With great RESPECT for future generations

We develop attractive and sustainable urban districts in locations with rail connections. In our view, it is only natural to take responsibility and be a reliable social player that respects laws and acts decently both with regard to individuals and in the context of business relations. We are to achieve our commercial goals and, at the same time, our ambition is to exceed the sustainability demands that our customers and the surrounding world make on us. One example of this is the fact that all our properties will be environmentally certified in accordance with the BREEAM-SE standard. In our work on human rights, ethics and the environment, we abide by the Ten Principles of the UN Global Compact and other internationally recognised standards.

Our commitment includes consideration for the economic, environmental and social impacts of our urban development business. The objective is quite simply to safeguard and, in many cases, improve the environment for future generations.

### A secure work environment for **OUR EMPLOYEES**

Fabege strives to ensure that all employees feel involved in the company's development and results. We are a flat organisation with short decision paths, marked by an entrepreneurial spirit that promotes individual initiative and innovation.

### Equality and diversity

Our fundamental mindset is that all people are of equal value, and that all employees at Fabege should have the same opportunities, rights and obligations.
Our work climate is to be distinguished by respect and fairness between individuals and groups.

No-one is to be discriminated against on the basis of their sex, gender identity or expression, ethnicity, disability, religion or other belief, sexual orientation or age.

#### A good work environment

Our employees are to be offered a good, safe and healthy work environment, in which management and employees contribute jointly to well-being, efficiency and safety. A good work environment is not only secure – it must also lead to personal development, creativity and job satisfaction

### **Personal development**

We aim to attract, develop and retain talented employees. By providing continuous training and development opportunities, we aim to equip all employees with the skills they need to achieve good results.

### **Our integrity**

Fabege employees must avoid situations in which their personal or financial interests may conflict with those of the company.

We take joint responsibility for ensuring that any information which could be harmful to an individual or the company is not spread, and that the company's assets are protected from loss, theft or misuse.

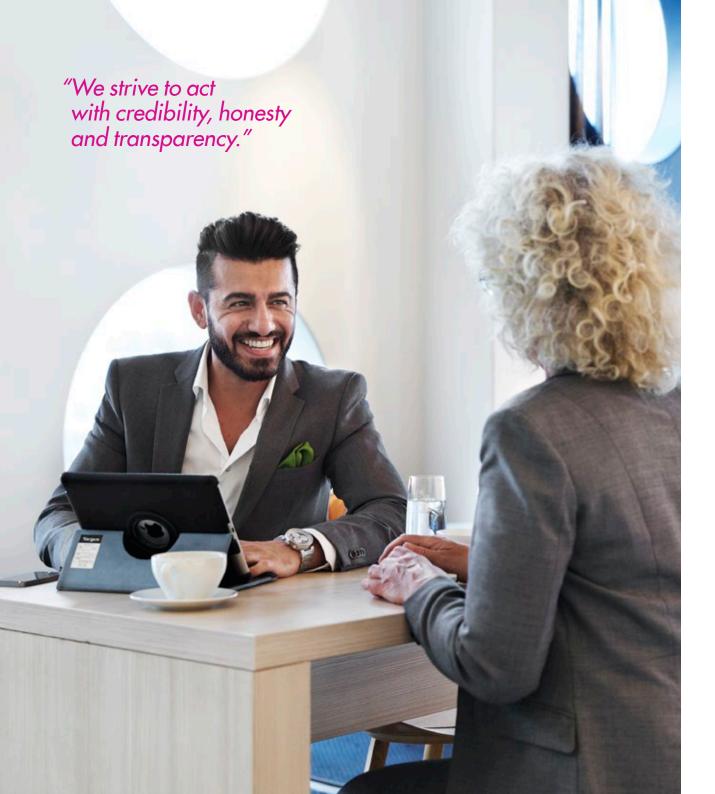
### Unfair labour practices and force

Fabege takes a zero tolerance approach to any form of exploitation involving children or other vulnerable groups in the labour market.

"... all employees shoul dfeel involved in the company's development and results."

#### Communication

Our organisation conducts open and constructive dialogue, based on respect for each individual. All employees are entitled to receive information about the company's overall objectives and strategies, and how their own work is contributing to meeting the company's goals. All managers and employees are jointly responsible for ensuring access to the information that each employee requires in order to perform his/her tasks efficiently.



### CONFIDENCE

### in our business partners

Good business ethics that promote fair competition and avoid all forms of corruption are the foundation of our relationships with customers, suppliers, the financial market and partners. We strive to act with credibility, honesty and transparency. Fabege's suppliers are evaluated on the basis of both their quality and sustainability performance.

#### Integrity

Fabege employees are not permitted to offer or receive bribes, or participate in any form of corrupt business practices. We refrain from giving and receiving gifts of more than symbolic value and do not participate in activities that could affect our objectivity when making business decisions. Hospitality and customer events must always be modest and have a clear connection with our business. Customers must always be offered the opportunity to cover the cost themselves so as to avoid possible accusations of bribery and corruption. Any suspected abuse or offences in either Fabege's organisation or that of a business partner will be promptly investigated. Any violations will be subject to strong disciplinary action.

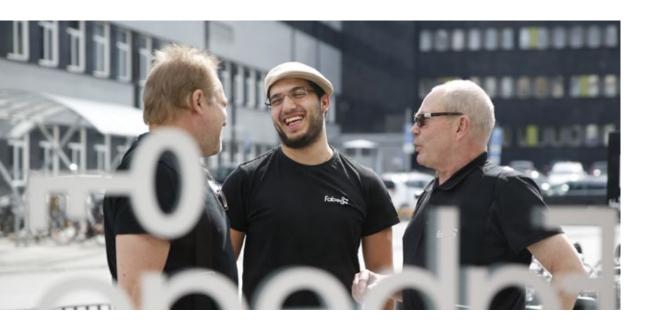
### Unfair labour practices and force

Fabege takes a zero tolerance approach to any form of exploitation involving children or other vulnerable groups in the labour market. Collective bargaining agreements and freedom of expression and association must be respected.

#### **Shared values**

Our partners must be made aware of our values and Code of Conduct, and are naturally expected to follow our guidelines. We seek out, evaluate and select partners on the basis of objective factors such as quality, price and reliabilty, and also take into account their commitment to environmental and social issues. We expect partners who meet customers on our behalf to act in a manner consistent with our guidelines and values.

### Responsibility to our **SHAREHOLDERS**



We aim consistently to be among the leading listed property companies, and to provide long-term, sustainable value creation.

#### **Openness and accessibility**

Fabege strives to maintain open, transparent and relevant dialogue with shareholders, analysts and investors. It is our responsibility to provide accurate and readily available information to our shareholders and other stakeholders. All communication must aim to build trust and long-lasting relationships, and to prevent speculation and rumour.

### Regulatory obligations and voluntary commitments

We abide by the regulations that apply to listed companies, and follow the practice that exists on the financial market. Financial, environmental and social objectives are well integrated into our operations and in our reporting to shareholders. Since our ambition is for our business to exceed the sustainability requirements of responsible investors and ethical funds, we engage in ongoing dialogue with multiple stakeholders on these issues.

### **IMPLEMENTATION** and compliance

The Code of Conduct encompasses all employees, regardless of their position. The Board of Directors and Executive Management Team are specifically responsible for promoting implementation of the Code of Conduct. Providing our employees with regular training in our Code of Conduct and maintaining an ongoing dialogue on ethical issues are among our prioritised sustainability goals.

#### **Ethics group**

Our ethics group is tasked with discussing ethical and moral issues on an ongoing basis so as to develop our practice in these contexts. Employees can turn to this group with concerns about ethical issues or report actions that may be considered to be contrary to the Code of Conduct. The group consists of representatives from various parts of the company and meets on a regular basis.

#### Whistleblower service

We are committed to acting with credibility on ethical issues and are determined to intercept suspicions of any irregularities at an early stage, preferably through dialogue but also via anonymous reporting systems. For those who wish to remain anonymous, Fabege has established a whistleblower service, where both the report and any subsequent dialogue are encrypted and password-protected. We wish and hope that both employees and the world around us feel secure enough to contact us initially in person. The whistleblower service, which can be accessed

via our website, should be viewed as a last resort when no other approaches are open.

On suspicion of a serious irregularity or action contrary to our Code of Contact, Fabege employees are initially encouraged to contact their immediate superior or a representative of the Executive Management Team.

#### **Actions**

A work group at Fabege has been tasked with ensuring that the reports received are promptly investigated and that appropriate measures are adopted. The Executive Management Team, and where relevant also the Board of Directors, maintain a continuous watch on the work concerning the Code of Conduct and any incidents.

