

Introduction by the CEO

Our Code of Conduct contains several principles that describe how we, as employees of Hemsö, are expected to act in our occupational roles.

Hemsö endeavours to act with the greatest possible trustworthiness, honesty and openness. This means we must act in an ethical and professional manner, treating everyone with respect. We aim to maintain long-term relationships with the company's stakeholders, and high ethical standards in our business operations.

We aim to ensure security and respect for all people associated with our operations. Nurturing an open climate in which our employees feel comfortable discussing, reacting, and acting creates a workplace characterised by a high degree of job satisfaction and well-being.

Nils Styf

About the Code of Conduct

The purpose of the Code of Conduct is to show, internally and externally, our reasoning as regards ethical issues concerning our business operations. The Code of Conduct describes how our core values, visions, obligations and expectations guide our everyday actions and provides guidance for employees.

Scope

The Code of Conduct applies to all employees and temporary employees, as well as consultants and contractors. The Code of Conduct provides guidance on various matters but cannot give answers to how to act in all possible situations. If there is any uncertainty, the question should always be raised with your immediate superior. In addition to the Code of Conduct, the "Hemsö's supplier requirements," which is adapted to the Code, applies to all suppliers.

Our core values

For Hemsö, our core values are a key starting point in all our work. Our three core values are *accessible*, *reliable*, and *progressive*, and involve the following.

Accessible

- We are locally based and work closely with our customers. We listen carefully and always strive to promote positive dialogue. – We are a dependable and accessible partner, with high availability.

Reliable

- We take responsibility for the properties we manage and build confidence through financial stability and stable ownership. We contribute to social sustainability and our properties are part of the social infrastructure.

Progressive

- We drive development in our industry. We develop offerings and premises based on the needs of our customers. We represent value-generating property development and ensure that our employees have opportunities to develop.

Guidance and frameworks

The Code of Conduct outlines what is expected of us in our occupational roles. It helps us work in a way that allows us to live up to the company's vision, goals and strategies, and to demands from customers and state authorities by:

- Describing for Hemsö's employees and consultants, in an easily accessible and general manner, which responsibilities accompany working for Hemsö;
- Describing the internal management of ethical questions; and
- Providing the business environment with a picture of how Hemsö handles ethical matters.

Ethical rules and guidelines can never fully regulate how every situation at a workplace should be handled. Hemsö thus depends on the good judgement of each employee. Ahead of every major decision or action, the following questions should be asked:

- Am I setting a good example?
- Can my actions be perceived as unethical, and in conflict with Hemsö's values?
- Are my actions consistent with the interests of Hemsö and Hemsö's customers?
- Could my actions adversely affect Hemsö's reputation?
- Do I need guidance or advice?

If you are unsure of how you should act in a certain situation, you are responsible for asking for guidance. Questions concerning the Code of Conduct should be raised with the respective heads of division.

Violations of the Code of Conduct

Compliance with the Code of Conduct is routinely monitored as a natural part of operating activities. If anyone suspects a violation of the Code, contact your immediate superior or HR. It is possible to remain anonymous via the whistleblower function on the company's website.

Responsibility to stakeholders

Our owners

Our owners expect a good return, and that Hemsö regularly provides an open account of our operations and our earnings so that the owners can make the right decision.

Our customers

For Hemsö, responsibility towards customers means retaining customers and bringing in new ones through managing properties and relations in a way that meets customer expectations for quality and sustainability while using good business ethics. Customers at Hemsö are both our contracting parties and those who use our premises.

Employees

Hemsö's work environment is to be characterised by respect and trust for the individual, as well as openness, involvement and cooperation between management and employees. Through its systematic work environment efforts, Hemsö works to achieve a work environment that is safe, stimulating and progressive for all employees.

At Hemsö, all employees should have the same opportunities, rights and obligations. All employees should be treated equally, impartially and with respect regardless of ethnicity, gender, age, nationality, disability, sexual orientation, religion, or political views. The company's work climate should be characterised by respect and understanding of other people.

The above means that:

- Hemsö undertakes to offer all employees safe and healthy workplaces.
- Hemsö endeavours to provide its employees with good opportunities for skills development.
- Hemsö is to ensure that employee data will be recorded, archived, and used with strict confidentiality.
- Hemsö works actively for an open, permissive work environment.
- Hemsö works actively on health-promoting activities for all employees.
- Hemsö respects the voluntary right of all employees to form and join trade unions they themselves choose, and to negotiate collectively.

All employees undertake to comply with the company's policies and guidelines, and not to disseminate information that could damage the Hemsö Group or any of its business partners.

Our suppliers and partners

Hemsö and its employees do not accept gifts or payments or claim benefits from another person or organisation in exchange for services. Hemsö's employees and other representatives are forbidden from directly or indirectly offering or approving payments, gifts, or other enticements for the purpose of obtaining improper advantages. All employees must avoid conflicts of interest between private financial matters and the company's business operations. Therefore, at Hemsö, we do not engage our suppliers for private use, regardless of scope and purpose.

Anti-corruption

Anti-corruption Hemsö combats corruption through a preventive and risk-based approach. We act with transparency, integrity and sound business ethics, and we never accept bribes or other improper benefits.

Communication

What we do in our operations every day and how we interact with our tenants and other stakeholders creates value that constitutes the crucial foundation for building our brand. Through our communications, we convey what we do and what we represent that further strengthens our brand. All communications must comply with Hemsö's guidelines for graphics.

All information made public by Hemsö must be accurate, relevant and clear, and not misleading. Information about decisions, facts and circumstances must be sufficiently detailed to enable an assessment of the significance of the information for Hemsö, its financial results and position, or the price of Hemsö's financial instruments. Hemsö's information disclosure shall be characterised by openness and accessibility, insofar as reasons of confidentiality or competition do not provide an exemption from disclosure of the information or comments.

Some of Hemsö's information is confidential. Information that is communicated internally is not automatically public. Always consult with your immediate superior or the Head of Communications if any uncertainty arises. Information that can reasonably be expected to affect the price of Hemsö's financial instruments must be disclosed in accordance with the regulations and provisions for insider information that are in force at any given time.

Our actions in the market

Hemsö endeavours to maintain an open climate and good ethics. Our company endeavours to ensure security and respect for all people associated with the operations. We seek to counteract all forms of corruption and all our employees and suppliers are expected to comply with applicable laws, regulations, and the established Codes of Conduct. Throughout its operations, Hemsö is to comply with the legislation and administrative provisions of the respective countries.

Employees who suspect that something is wrong have both the right and a duty to report such matters. External parties – suppliers, for example – can also report on matters they believe to be relevant via the whistleblower function on the Hemsö website.

Hemsö renounces corruption and unethical behaviour, and assumes transparency, integrity and honesty in all aspects of its operations. This means that Hemsö complies with and respects contracts and agreements it has signed and works to counteract all forms of violation of the law including corruption, bribes, and extortion. The same is also encouraged in and expected from suppliers, business partners and other partners.

Hemsö always endeavours to build long-term business relationships based on mutual trust. It is the responsibility of every employee, in their daily activities, to work in accordance with Hemsö's values and to follow laws, regulations, policies and guidelines etc.

Sustainable development

Hemsö's vision is to be the best property company for public services, and Hemsö's business concept is to sustainably own, manage and develop public properties. This involves being a long-term and responsible property owner that conducts sustainable business in all parts of its operations. Hemsö's properties are part of the social infrastructure, and our premises create conditions for education, health care and justice system services – all of which are fundamental to a sustainable society.

Hemsö considers the applicable laws and other regulations and international standards on human rights, labour and the environment as a minimum level and, as a responsible and progressive player, helps to drive development forward in the areas that are relevant to Hemsö's operations. The objective of Hemsö's sustainability work is to:

- Offer secure and healthy environments for all the people who use our properties.
- Be an attractive employer for current and potential employees.
- Identify areas in which Hemsö can contribute to development by making conscious and well-informed choices.
- Ensure effective use of human and natural resources.
- Take responsibility for any negative impact on society and/or the environment generated by Hemsö's operations.
- Ensure adequate expertise in sustainability through training and communication.
- Show long-term, sustainable financial growth in accordance with yield requirements.