

# code of conduct

Adopted by the Board of Directors in Akelius Residential Property AB (publ) 2021-08-17.

## scope and application

This code

- is the basis of Akelius' business activities
- determines Akelius' success as a long-term, sustainable business
- promotes excellence as Akelius' corporate culture

This benefits all aspects of Akelius' business activities.

Akelius is an esteemed employer and trustworthy partner to tenants, suppliers and society as a whole. Akelius acts honestly and ethically.

This code applies to all Akelius' Board members, management, consultants, employees as well as any other persons acting for and on Akelius' behalf.

In addition to this Code of conduct, Akelius has also adopted a Code of conduct specifically for suppliers and business partners.

## principles

Akelius acts in accordance with the following principles.

### **general principles**

The Akelius group

- respects the rule of law and acts in accordance with law and regulation in all countries where Akelius does business
- conducts business with integrity and honesty
- acts in an environmentally and socially sustainable manner

- commits to continuously develop the safety and quality of services

### **anti-corruption and conflicts of interest**

Akelius does not engage in cartels or other corrupt or competition limiting activities. Akelius does not accept or participate in the offering, request or acceptance of bribes, extortion or money laundering.

Akelius employees avoid situations in which their professional loyalty may come into conflict with personal interests and do not allow such interests to affect their professional judgement.

### **marketing and communication**

All marketing and advertising shall be honest and consistent with what Akelius can provide. Akelius is committed to open and transparent communications subject to the rules applicable for stock listed companies.

### **properties**

Akelius' properties shall be kept in good condition and fulfill the promise of Better Living as well as the reasonable expectations of Akelius' tenants on standard and service.

### **discrimination**

Akelius does not tolerate discrimination or harassment of any kind or for any reason. Akelius' employees work in an environment where equality is valued, and which is free from harassments, threats and discrimination.

### **human rights**

Akelius supports and protects international human rights as expressed by the UN and other recognized organizations, particularly children's rights. Akelius does not participate in human rights violations of any kind.

### **privacy**

Akelius respects the right to privacy and personal information is processed only to the extent required for us to provide the offered products and services.

### **sustainability**

Akelius continually works to reduce environmental impact. Business is conducted on a long term basis to support a sustainable society.

Akelius integrates environmental considerations into business planning and decision making. Business relationships comply with local environmental legislation and strive to impose as little negative impact on the environment as possible.

### **working environment**

Akelius provides its employees with a safe and healthy work environment.

Akelius practices freedom of association for all employees, respects the rights and privacy of the individual and demonstrates good faith and mutual respect in dealings with employees and their representatives in the workplace.

Akelius provides a safe, healthy and inspiring work environment for all employees.

Akelius encourages all employees to live a balanced and active life.

### **working hours and remuneration**

Akelius acts in accordance with applicable local laws, regulations and industry standards on working hours and remuneration in the countries where Akelius does business.

### **shared values**

Akelius works only with parties that share the values expressed in this code.

Akelius reserves the right to terminate any cooperation where a business partner acts in violation of this code or its own equivalent standards of conduct.

## **responsibility**

This code applies to all Akelius operations and employees worldwide regardless of function, grade or standing.

Akelius' business activities shall be continuously monitored in relation to this code.

All management executives and other supervisors are responsible for ensuring that all employees adhere to this code.

Akelius does not accept violations against this code and any such actions may lead to disciplinary measures including dismissal and prosecution.

This also applies to approval of such actions, whether expressed or silent.

## reporting

All Akelius employees are encouraged to report suspected violations of this code to their nearest supervisor.

If this is not applicable for whatever reason, the employee should contact the local Staff Department for assistance.

Employees, suppliers or other business partners can report a suspected violation against the Code of conduct anonymously through Akelius' system for whistle blowing at <https://app.incy.io/akeliuswb/links/report>.

Violations can also be reported via

- email to [whistleblower@akelius.com](mailto:whistleblower@akelius.com)
- mail to whistleblower, P.O. Box 38149, SE-100 64, Stockholm
- telephone to +46 08 566 130 99

A meeting can also be arranged for submitting a whistleblower report, if requested.

Only the Chairman of the Board and the company's General Counsel have access to the whistleblowing system and the other channels.

The anonymity of anyone who reports suspected misconduct in good faith will be protected.

Please note that Akelius can only guarantee anonymity for whistleblowers who use Akelius' system for whistle blowing.

False allegations or misuse of the whistle blowing channel procedure is in itself a violation against this code.