

# code of conduct, policy

## **Business Development unit 2024-11-26**

Adopted by the Board of Directors in Akelius Residential Property AB (publ) 2023-02-09.

Reviewed 2024-12-10.

## 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 harassment, 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.

This can be done through

- Akelius' system for whistleblowing, at <https://app.incy.io/akeliuswb/links/report>
- email, to [whistleblower@akelius.com](mailto:whistleblower@akelius.com)
- mail, to whistleblower, Engelbrektsgatan 9-11, Box 5836, 102 48 Stockholm, Sweden

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

The company protects the anonymity of anyone who reports suspected misconduct in good faith.

Please note that Akelius can only guarantee anonymity for whistle blowers who use Akelius' system for whistleblowing.

An Akelius employee has no disadvantages or negative consequences to expect from reporting suspected misconduct.

Akelius will retain documents and information regarding possible attempts at corruption, benefit acceptance, and process personal data in this context as necessary and permissible according to law.