

**BUSINESS
PARTNER
CODE
OF
CONDUCT**

Adapteo.

Business Partner Code of Conduct

Revised by the Adapteo Board of Directors
on 15 December 2020

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Introduction

By providing buildings that adapt to people and the planet we enable societies to become resilient and sustainable.

Adapteo's purpose is "Building adaptable societies". We believe that society will go through immense change in the years to come. As our ways of life, user needs, and sustainability demands evolve, facilities have to transform accordingly.

Sustainability is an integrated part of our brand and services. With a circular construction concept, Adapteo provides buildings that can adapt to the needs of both people and planet. We use climate-smart raw materials, resource-efficient production, innovation and an inclusive approach. We offer adaptable solutions that help our customers become more sustainable. We also work to ensure ethical business practices in our operations and through our value chain.

Adapteo is a signatory to the UN Global Compact and we are committed to its fundamental principles on human rights, labour rights, the environment and anti-corruption throughout our operations. This also includes building sustainable relationships with our Business Partners. We take responsibility for the Business Partners we cooperate with and expect from them the same level of integrity, honesty and ethical behaviour as they can expect from us, including securing that their own Partners do too.

Business Partner ("Partner") can include suppliers, distributors, agents, resellers, joint venture partners, consultants, customers and strategic partners.

At Adapteo, we are proactive, collaborative and committed, always with our customers' best in mind. We seek collaborations in every area, both internally and externally, and we are committed to delivering the best solutions to our customers at all times, having both people and the planet in mind, and to build adaptable societies together. Adapteo prioritises long-term collaboration with partners who work to strengthen our and their reputation for the highest ethical standards and for long term sustainable profitability. This will improve our joint businesses. Our partners play a critical role for our brand building and our high quality standards, and this is why we have developed this Business Partner Code of Conduct ("The Business Partner Code") and we require our Business Partners to make every effort to comply with it.

Requirements

1. Legal compliance

Ensuring awareness of, and compliance with, relevant legal requirements is the baseline for complying with The Business Partner Code.

We expect our Business Partners to be updated on, and comply with, applicable international regulations and conventions, as well as regional and national legislation together with the content in this Business Partner Code. If the requirements of this Code are stricter than local laws, the Partner shall follow the Code.

Business Partners shall:

- Comply with relevant legislation regarding human rights, labour rights, working conditions, health and safety, environment, tax and anticorruption practices, as well as the requirements set out in this document, and obtain all legally required permits, licenses and registrations.
- In cases where local laws or regulations provide a stronger protection than the requirements in The Business Partner Code, allow such local laws or regulations to prevail.
- Be aware of whether any domestic regulation or its enforcement is in conflict with international human rights standards, and strive to honour the spirit of universally recognised human rights.
- Communicate transparently. Provide correct and consistent information to its stakeholders in a timely manner and in accordance with applicable stock exchange rules.
- Be able to demonstrate their compliance with local legal requirements upon request.

2. Health and safety

Health and safety are fundamental at Adapteo. Business Partners shall provide a safe and healthy working environment and take all practicable steps to prevent incidents and injuries.

Business Partners must have an adequate, risk-based health and safety program, including, for example, a health and safety policy, relevant instructions and training that is understandable to all employees. The scope of the health and safety program must be appropriate in relation to the nature of the business and risks related to the business. The program must include, at minimum, the following activities.

- **Safe and healthy workplaces:** The Partner ensures a safe working environment and provides adequate information, training, facilities, provisions and protective equipment to safeguard the health and wellbeing of all personnel.
- **Workplace conditions:** The partner ensures that the work premises are clean, well lit, adequately ventilated and kept at acceptable temperatures and noise levels. Provide free access to clean drinking water, hygienic toilets and clean areas to eat meals. If accommodation is provided, ensure that each employee have the right to his/her own bed. Provide separate sleeping areas, toilets and showers for men and women.
- **Designing safe products:** The Partner assures that its products and services are designed, produced and provided with relevant safety information such that they are safe for their intended use.

3. Labour and human rights

It is of great importance that Adapteo's Partners treat their employees fairly, with dignity and respect, and that they respect human rights.

- **Protecting Human Rights.** The Partner is aware of, respects and upholds human rights in its operations and makes reasonable efforts to ensure it is not complicit in human rights violations via its business relations.
- **No discrimination.** The Partner does not tolerate discrimination, harassment or less favourable treatment in hiring and employment practices, due to gender, age, ethnic origin, different age groups, religion, trade union activity, pregnancy or other legally protected characteristics.
- **No forced or compulsory labour.** The Partner ensures that all work by employees and contract personnel is voluntary and all workers are free to leave upon reasonable notice. No employees or contract personnel are forced to deposit money, passports, education certificates or similar documentation as a condition for employment.
- **No child labour.** The Partner does not employ any person younger than the age for completing compulsory education or younger than 15 years. The Partner ensures that young people above minimum age but under 18 years are not subjected to working conditions that jeopardise their education, health or safety.
- **No precarious employment.** The Partner ensures that their employment relationships do not cause insecurity or social or economic vulnerability for their workers. All work is performed according to a recognised and documented employment relationship and the Partner does not use sub-contracting to undermine the rights of workers.
- **Working hours:** The Partner complies with applicable laws and industry standards on working hours.
- **Employee conditions:** The Partner informs all employees of their employment conditions, including rights and obligations, in the employee's native language or a language they understand, for example in a written labour contract.
- **Fair remuneration.** The Partner complies with relevant governments' minimum wages, or industry standards approved on the basis of collective bargaining, whichever is higher. Ensure that employees with the same experience and qualifications receive equal pay for equal work and equal opportunities.
- **Freedom of association and right to collective bargaining.** The Partner respects the right of all employees to form and join trade unions and to bargain collectively and individually.

4. Environment

Protecting the environment and contributing to sustainable development is of great importance to Adapteo.

Business Partners shall actively strive to increase the positive, and limit the negative, impact of their operations and supply chain on the environment and society.

- **Environmental risks:** The Partner shall establish, implement and maintain a risk-based program to reduce or minimise any negative environmental impact from its activities, products and services.
- **Precautionary measures and climate neutral techniques:** The Partner takes a precautionary approach to environmental challenges, undertakes initiatives to promote greater environmental responsibility, and strives to develop and support climate neutral techniques in their products, processes, designs and material selection.
- **Environmental responsibility:** The Partner shall actively work with, and provide information and documentation pertaining to the following areas:
 - Chemical and hazardous material management
 - Waste management
 - Emissions to air, water and soil
 - Energy management
 - Water consumption
 - Transport and travel

Business Partner-specific requirements and targets related to environmental performance may be defined in commercial agreements.

- **Sustainability policy and targets:** The Partner shall be aware of and contribute to Adapteo's sustainability policy, strategy and targets (appendix)

5. Anti-corruption and competition law

Adapteo is committed to conducting business with high ethical integrity. We have zero tolerance of corruption. We also respect competition laws which prohibit anticompetitive agreements and abuse of market power.

- **Secure anti-corruption:** The Partner complies with local laws and international anticorruption conventions and shall not engage in, or cause Adapteo to engage in, any form of corrupt practices, including extortion and bribery. We appreciate good working relations, but gifts or promotions should never influence business decision. Therefore, it is key for Adapteo to bear our own costs. We consider moderate representation at lunches and dinners for business purposes legitimate, but do not accept event fees, or expenses for travel and lodging to be covered by our Partners. We do not accept gifts from Partners.
- **Secure fair competition:** The Partner respects and complies with applicable competition laws and regulations, and establishes systems to prevent competition law infringements. Adapteo's employees and Partners shall not participate in any collaboration or behave in any other manner that could be perceived as restricting competition. Adapteo's employees and Partners are aware that the information, working documents and systems provided by Adapteo, or which are developed based on information provided by Adapteo, and which are not public, must be treated as confidential. Adapteo's employees and Partners show caution in handling the company's documents and information.

6. Compliance and follow-up

We encourage our Business Partners to strive towards continual improvement, and to establish, implement and maintain recognised management systems and standards related to the areas described in The Business Partner Code. Risk assessment, implemented policies, processes and routines, clearly communicated roles and responsibilities, relevant training and instructions, establishment and performance evaluation of measurable goals, along with functioning control systems, serve as the foundation for a successful implementation of The Business Partner Code.

All business relations between Adapteo and our Business Partners must be based on honesty, trust and cooperation. The Partner co-operates with Adapteo in a transparent manner, provides Adapteo with any information that Adapteo may request regarding the standards in the Code, including completing self-assessments and granting Adapteo personnel, or a third party of Adapteo's choice, access to relevant premises and information to conduct on-site audits. We expect our Business Partners not to mislead us. Violation of The Business Partner Code will cause negative impact on the business relation with Adapteo, including, but not limited to, the risk of contract termination. We also expect our Business Partners to evaluate and monitor their supply chain, and collect relevant information regarding the supply chain's compliance to be given to Adapteo upon request.

Adapteo treats all business and personal information received in a responsible manner and take measures to ensure that this information remains confidential.

We encourage an active dialogue with our Business Partners on issues related to The Business Partner Code, or other questions concerning sustainability. If there are any questions about how to implement this Code, the Partner is to take immediate contact with Adapteo. The Partner should also take immediate contact with Adapteo to report any non-compliance with this code, in its own operations or its supply chain.

We encourage our Business Partners to report violations of The Business Partner Code to Adapteo through our Whistleblowing online service, run by a third party, WhistleB, Whistleblowing Centre by accessing the following URL: <https://report.whistleb.com/adapteo>.

Partner signature

As a Business Partner to Adapteo we sign this document to acknowledge that we meet these requirements and that we understand that they are an integral part of our business agreement.

Company

Name

Title

Date and place

Signature

Adapteo.