

Code of Conduct





Background

The Wallenstam Group's long-term success depends on the operations being conducted in a responsible way. The day-to-day operations are therefore conducted against the backdrop of the Group's core values, which state that Wallenstam (1) takes active responsibility for development and progress (2) shows respect for people and the environment and (3) has a deep and genuine commitment to housing. The Code of Conduct is based on these core values and has been adopted to emphasize the policies and guidelines that govern the Group in relation to employees, customers, suppliers and other partners. The Code of Conduct applies to all employees in the Wallenstam Group.

General principles

The Wallenstam Group shall

- comply with laws and regulations in the countries where the company operates
- demonstrate an environmental, social and commercial commitment in everything we do
- apply responsible business methods, which are characterized by high business ethics and good business practice where we take responsibility for our enterprise and show respect and loyalty to the parties involved

Demands on partners

The Wallenstam Group chooses to collaborate with suppliers, other partners, customers and commercial tenants that share the principles in this Code of Conduct.

The Wallenstam Group's long-term success is dependant on the business being conducted in a responsible manner.

Recognition and reporting

The Wallenstam Group recognizes all financial transactions according to Swedish generally accepted accounting principles and follows International Financial Reporting Standards (IFRS). Recognition shall be transparent and provide a true and fair view of the Wallenstam Group.

Taxes

The Wallenstam Group shall comply with applicable tax laws and tax rules. If the tax legislation does not provide any clear guidance, transparency and accuracy shall guide the Group's conduct.

Information and marketing

Information disclosed by the Wallenstam Group shall be transparent, true and fair and accessible in accordance with the rules applicable to listed companies.

All marketing and contact with customers shall be honest and shall not promise anything that does not correspond to reality.

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Conflicts of interest

The private interests of employees shall not influence their judgement or conduct when they perform duties as representatives of the Wallenstam Group. If a conflict of interest arises, or could arise, employees shall report it to their manager, their manager's manager, to Wallenstam's Ethics Council or through Wallenstam's whistleblower service.

Quality and service

Each contact with customers shall be characterized by friendly treatment and professionalism.

Properties

The Wallenstam Group's properties shall be maintained in such condition that it corresponds to the promises made regarding services and standards. Security in and around the Wallenstam Group's properties and wind turbines shall be good.

Healthy competition

Competitive benefits shall be utilized while treating competitors professionally.

Insider trading

Employees have the right to trade in the Wallenstam share provided that they do not have access to insider information concerning Wallenstam and otherwise follow applicable laws and rules for such trading.

Political involvement

The Wallenstam Group adopts a neutral position in party political questions. The Wallenstam Group does not lend its name to political parties or individual political candidates.



Responsible business

Anti-corruption

The Wallenstam Group shall not participate in or accept corruption, bribery or unfair anti-competitive practices.

Wallenstam encourages its employees to raise issues regarding fraud and corruption.

Environmental policy

Wallenstam develops and builds as well as acquires and sells properties based on the needs of customers, society and shareholders. These activities shall be conducted with the least possible impact on the environment, in order to contribute to long-term and sustainable development. Wallenstam considers environmental work as a further opportunity to reach the company's goals. The environmental policy covers all of the Group's operations.

Social responsibility

The Wallenstam Group shall take active responsibility for regional and urban development by promoting improvements to the social environment, atmosphere and security in the areas where the Group operates.

Human rights

The Wallenstam Group's operations, which today are mainly conducted in Sweden, shall support and respect the protection of internationally proclaimed human rights and children's rights, and to work for that the Group does not contribute towards violations of these rights.

Equality and diversity questions are important in Wallenstam's operations, both in our internal efforts and in the Group's role as a corporate citizen.

Anti-discrimination and harassment

No employee – nor customer, supplier or other partner – may be discriminated against or harassed on account of gender, religion, nationality, age, disability, sexual orientation, pregnancy, political opinion, trade union affiliation, social background or ethnicity.

Working environment

The Wallenstam Group strives to be a modern and dynamic workplace. The Group's employees shall be provided with the right conditions for a safe and healthy working environment, which stimulates and encourages new thinking.

Wallenstam shall have capable leaders who create a good working environment where employees take pleasure in their work and feel job satisfaction.

Registration, filing and use of data concerning employees shall be treated confidentially and in accordance with GDPR.

Working hours and remuneration

The Wallenstam Group shall comply with applicable laws, agreements and industry standards in respect of working hours and remuneration.



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Responsibility and compliance

The Code of Conduct shall be continually followed up in the operations.

The Wallenstam Group's employees are responsible for complying with the Code of Conduct and with other policies and guidelines in force at any given time. It is the responsibility of each manager to ensure that information is provided about the Code of Conduct as well as other policies and guidelines and to ensure that they are observed in his/her area of responsibility.

Actions that violate this Code of Conduct are not tolerated and may result in disciplinary measures, which may include dismissal and prosecution. The same applies with regard to explicit or implicit approval of actions that violate the Code of Conduct.

Reporting of deviations from the Code of Conduct

Employees in the Wallenstam Group are encouraged to report suspected violations of the Code of Conduct to their manager, their manager's manager, to Wallenstam's Ethics Council or through Wallenstam's whistleblower service. Wallenstam does not tolerate any form of harassment or bullying and shall take measures to protect all those who report their suspicions in good faith.

Wallenstam undertakes to ensure that sufficient resources are provided to investigate all reports.

Adopted by the Board of Directors of Wallenstam AB (publ) on December 5, 2019