

Code of Conduct





Background

Wallenstam's long-term success is dependent on operations being conducted in a responsible manner. The day-to-day operations are therefore conducted against the background of the Group's core values, which state that Wallenstam (1) takes responsibility for development, (2) shows respect for people, the environment and the climate (3) and has a commitment to housing. The Code of Conduct is based on these core values and aims to provide guidelines for daily operations. The Code of Conduct applies to all employees within Wallenstam and, in applicable parts, also to Wallenstam's partners, regulating how we shall behave in relation to each other.

Responsibility and compliance

Wallenstam's board is responsible for the content of the Code of Conduct and adopts it annually or as needed. The CEO is responsible for compliance with the Code of Conduct and the CFO is responsible for its revision.

All managers within Wallenstam are responsible for informing their employees about the Code of Conduct as well as other policies and guidelines. However, it is the responsibility of each individual employee to follow the Code of Conduct and other applicable policies and guidelines at any given time. The Code of Conduct must be continuously followed up in the business. Actions that violate this

Code of Conduct will not be tolerated and may result in disciplinary action. The same applies to explicit or implicit approval of actions that contradict the Code of Conduct.

General principles

Wallenstam shall:

- comply with laws and regulations in the countries where the company operates.
- demonstrate environmental, social and business commitments.
- apply responsible business methods that are characterized by high business ethics and good business practices where we take responsibility for our business and show respect and loyalty to the parties involved.
- have a friendly, correct and professional manner in all customer contact.
- choose to cooperate with suppliers, corporate tenants and other partners who share the principles of this Code of Conduct.

Wallenstam's long-term success is dependent on operations being conducted in a responsible manner

Accounting and reporting

Wallenstam reports all financial transactions in accordance with the generally accepted Swedish accounting principles and follows International Financial Reporting Standards (IFRS). Accounting shall be transparent and provide a true view of Wallenstam.

Taxes

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

Information and marketing

Information disclosed by Wallenstam shall be transparent, fair and accessible in accordance with the rules applicable to listed companies. All marketing and contact with customers shall be appropriately compliant.

Conflicts of interests

Private interests shall not influence their judgment or conduct when they perform tasks as representatives of or suppliers to Wallenstam. If a conflict of interest exists, or could exist, as far as employees within Wallenstam are concerned, this must be reported to the immediate manager, their manager, Wallenstam's Ethics Council or through Wallenstam's whistleblowing function.

Both employees and suppliers etc. can turn directly to Wallenstam's whistleblowing function.

Insider trading

Employees have the right to trade shares in Wallenstam provided that they do not have access to insider information concerning Wallenstam and otherwise comply with applicable laws and regulations for such trading.

Political involvement

Wallenstam takes a neutral position when it comes to party political issues. Wallenstam does not lend its name to political parties or individual political candidates.

Safety and security

Wallenstam shall work for increased safety for our customers who live and work in our properties. The issue is a main focus area for Wallenstam.

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



Responsible business

Anti-corruption

Wallenstam and its employees shall not participate in or accept corruption, bribery or unfair anti-competitive practices. Competitive advantages should be encouraged while competitors are treated professionally. Cartel formation, price collusion or abuse of market position must not occur. Wallenstam urges employees to raise questions about irregularities and corruption to their immediate supervisor, their manager, Wallenstam's Ethics Council or through Wallenstam's whistleblowing function.

Sustainability

In order to contribute to lasting and sustainable development, Wallenstam's business must be conducted with the least possible impact on the environment and climate. Wallenstam regards environmental and climate work as another opportunity to reach the company's goals. Wallenstam has chosen to prioritize five global goals within the UN's Agenda 2030 for Sustainable Development. The goals and areas that we focus on in our sustainability work are gender equality, sustainable energy for all, decent working conditions and economic growth, sustainable cities and communities and combating climate change. A more detailed description of Wallenstam's sustainability work can be found in the company's adopted sustainability policy.



Social responsibility

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

Human rights

Wallenstam shall support and respect the protection of human rights and work to ensure that the Group does not contribute to violations of these rights.

Anti-discrimination and harassment

Equality and diversity are important issues in Wallenstam's operations, both internally and in the Group's role as a social actor. 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 membership, social background or ethnic origin. Wallenstam does not tolerate harassment or bullying.

Working environment

Wallenstam strives to be a modern and dynamic workplace. Employees must be provided with the right conditions for a safe and healthy work environment that stimulates and encourages innovative thinking. Wallenstam must have competent leaders who create a good work environment where employees experience job satisfaction and well-being. Wallenstam does not tolerate employees or partners being under the influence of drugs or alcohol during working hours. Registration, archiving and use of employee data must be treated confidentially and in accordance with GDPR. Wallenstam shall comply with applicable laws, agreements and industry standards.

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Healthy workplaces

Wallenstam actively works to promote healthy and safe workplaces, by preventing ill health and accidents at work and otherwise creating a good working environment. All companies that carry out work on Wallenstam's construction sites must conduct their business in accordance with applicable laws and recognized industry practice.

Reporting of deviations from the Code of Conduct

Employees are encouraged to report suspected violations to the Code of Conduct to their manager, their manager's manager, Wallenstam's Ethics Council or through Wallenstam's whistleblower function. Wallenstam will take necessary measures to protect all those who present their suspicions in good faith. Wallenstam undertakes to ensure that sufficient resources are provided to investigate all reports.