



Code of conduct

Uppförandekod

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Statement from our CEO



Botrygg's vision is that "everyone should be able to afford to live in an attractive home". It creates a great focus on both cost awareness and long-term sustainable solutions. For us as a serious and responsible property owner and construction company, it is of the utmost importance that the costs we save and the quality we offer do not come at the expense of either planetary or human resources.

The code of conduct is based on the company's values, Botrygg's roadmap towards climate neutrality in accordance with the Paris Agreement and our voluntary commitments to the Global Goals and the UN Global Compact.

The code of conduct guides our employees to make correct decisions in their work. It also forms the basis for how we build long-term relationships and partnerships with our stakeholders. All employees at Botrygg must be well acquainted with and follow the principles and requirements conveyed by this code.

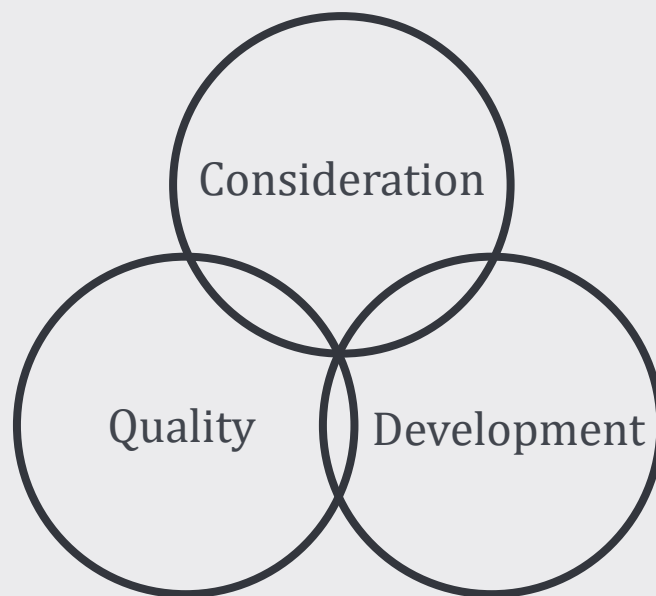
Our business partners, such as suppliers, contractors and consultants, have a major impact on our business and therefore it is crucial that they also respect and live up to our Code of Conduct.

A handwritten signature in black ink, appearing to read 'Adam Cocozza'.

Adam Cocozza
VD Botrygg

Botrygg's values

- a good start



Botrygg's values describes the way we act towards each other and the way in which we conduct our business. They are also the basis for how we act in our business relationships and what we expect in return.

Caring means that we show respect for each other. We are honest and take responsibility for our part of the process and expect this in return. Care for both people and the environment is of utmost importance in all our procurements and collaborations.

Quality must be top of mind in all our decisions. Since we are a family company that is building for future generations we always strive to think about the long term effects of our choices, and will demand the same approach from our partners and suppliers.

Development and curiosity is a natural part of our work. A close collaboration with our partners and suppliers is absolutely crucial to being able to successfully improve the industry and the company economically, socially and ecologically.



Business partners

Botrygg seeks long-term and good business relationships where both parties can develop and secure good quality for both services and products. We are therefore careful when choosing our business partners and we preferably work with proven and reputable companies. By showing each other and the parties involved extra care, we create the conditions for a long-term relationship and a robust and sustainable business operation.

With commitments within the three dimensions of sustainability, it is important that our business partners are part of our transition towards long-term sustainability. We see that this is a journey that we need to make together. We therefore encourage our Suppliers to their own sustainability commitments, and in particular regarding climate neutrality and efforts to preserve biological diversity.

Suppliers will be asked to provide information, in accordance with Botrygg's requirements, regarding compliance with the standards described in this Code of Conduct. Based on this information, the Suppliers will be evaluated and the results will be measured and compared. Botrygg requires the ability to carry out evaluations and inspections of the Supplier's facilities in order to be able to review compliance with the principles on site.

Botrygg invites the Suppliers to evaluate and follow up their subcontractors, as information about the subcontractors' compliance with this Code of Conduct may be required by Botrygg.

Business ethics

Botrygg applies good and transparent business practices. We comply with applicable legislation and have a high ethical standard. Our code of conduct helps us preserve and strengthen our good reputation with our customers and other stakeholders.

Our business partners must also keep accurate and complete accounts in accordance with good accounting practice and current legislation.

Botrygg checks that current subcontractors have paid taxes and employer contributions to ensure that they are serious companies that take responsibility. Botrygg may request documentation from the Supplier in the event that it is deemed necessary.

Quality and the environment must be protected

The suppliers must conduct their business in a responsible manner in relation to the environment and follow local and national environmental legislation. Through a structured and systematic strategy or through the identification, measurement and follow-up of environmental impact, the supplier must strive to constantly improve its environmental performance and minimize the use of resources and the production of waste.

The supplier must strive to use a life cycle perspective on the environmental impact of products and services and set environmental requirements for its subcontractors. All products must be safe, of good quality, contain no dangerous chemicals and have been produced with consideration for people and the environment.

We expect our suppliers to also have structured and quality-assured working methods.

Bribery and corruption are unacceptable

Botrygg has zero tolerance for corruption. Corruption encompasses a variety of harmful behaviors, ranging from the payment of small amounts in order to speed up routine matters to multimillion-dollar payments in order to secure major public projects. It can include various combinations of bribes, kickbacks, extortion, fraud, deceptive activities, money laundering and more.

Corruption: Botrygg will not accept any form of corruption or giving/taking bribes. Botrygg requires that our suppliers respect local laws and not participate in any form of corruption, extortion, fraud or giving/taking bribes. Botrygg's suppliers must never offer anything to a public official or a company official in the private sector that could cause them to abuse their position of trust. This is particularly important in the context of tendering procedures.

Conflict of interest: Botrygg's suppliers are obliged to inform Botrygg of any situation where a conflict of interest may arise and inform Botrygg if any of Botrygg's employees may have an interest of any kind in the supplier's business or any other form of financial connection to the supplier.

Representation and gifts: Employees may not accept gifts from suppliers or stakeholders regarding, for example, items, meals or event invitations without the CEO's approval. Any Christmas gifts sent may not be kept personally but instead collected and raffled among the employees where a symbolic amount for the raffle goes to charity.

Human rights must be respected

Botrygg's suppliers and contractors are expected to operate in accordance with *the UN Convention on Human Rights (1948)* and *the OECD's guidelines for multinational companies*.

The supplier has an obligation to respect and support human rights both within its own operations and in its value chain. The supplier must ensure that he does not participate or contribute, directly or indirectly, to violations of human rights. The supplier's responsibility also includes situations where the supplier fails to ask questions about violations of human rights or about crimes committed by a third party.

The supplier must have routines to assess the risks of participating in violations of human rights through its operations, in accordance with *the UN's guiding principles on business and human rights*.





Reasonable wages and working conditions

Wages and working hours: Wages must be paid, in full, directly to the employee within the time frame that has been agreed upon. The supplier must support the payment of wages to the employees that can be lived on and may under no circumstances support wages that are lower than collectively agreed wages, or, where applicable, the locally determined minimum wage.

Overtime compensation must be paid and clearly stated in wages specifications. Employees must have at least one rest day per week. Working hours may not exceed legal limits or a maximum of 60 hours per week, including overtime. Absence, including vacation, national holidays, sick leave and parental leave must be compensated in accordance with national legislation.

Safe and hygienic work environment: A safe and hygienic work environment refers to the fact that the employee, in an area over which the employer has direct or indirect control, is guaranteed to be free from or protected against conditions that may pose a danger to the employee's physical or mental health. An employee who works within the supplier's operational activities must ensure a safe and healthy work environment where preventive measures that reduce injuries and health risks must be taken. Employees must receive training on the potential health risks that the work may entail, including fire safety, hazardous operations and first aid. The employer must, to the extent possible, provide relevant protective equipment and ensure that information about health and safety is readily available at the workplace.

Labour law rules must be respected

Botrygg's suppliers and contractors are expected to comply with the ILO's 8 basic conventions on working conditions¹:

Prohibition of child labour and consideration of minimum age (ILO 138 and 182). Child labour refers to all economic activities carried out by a person of compulsory school age or younger. No employee may be under 15 years of age (or 14 years if national legislation allows this), or younger than the minimum age for employment, if this age exceeds 15 years. Young people aged 15-18 can work in non-hazardous operational activities, provided they have reached the legal age for employment and have completed compulsory national training. Temporary cation work to a legal extent and of a harmless nature can be accepted from the age of 13. If child labour is discovered, the supplier must act based on the child's best interests and find suitable solutions in consultation with the child and his family/guardian.

Forced labour is prohibited (ILO 29 and 105): Forced labour refers to labour or services that are exacted under threat of punishment and for which this person has not volunteered. Forced labour, including slave labour, debt slavery or involuntary prison labour must not take place. All work must be voluntary and the employee must have the right to terminate an employment after a reasonable notice period.

Discrimination and harassment are prohibited (ILO 100 and 111): Discrimination refers to any distinction, which is not based on merit or characteristics of a particular job, but involves differential treatment on biased grounds. The supplier must support diversity and equality in working life.

Discrimination on the basis of race, gender, marital status, pregnancy, religion, social or ethnic origin, nationality, physical ability, political opinion, trade union membership or sexual orientation must not take place. Harassment refers to cases when employees are subjected to harsh or inhumane treatment, including sexual harassment or other forms of psychological or physical punishment.

Freedom of association and collective bargaining (ILO 87 and 98): Freedom of association and collective agreements refer to formalized and/or informal forms of cooperation with the aim of supporting and defending workers' interests in the workplace and in the relationship between employer and employee. The supplier is expected to recognize and respect the rights of workers (and employers) to organize, to join organizations of their choice to participate, as well as the right to collective bargaining. In countries where freedom of association is limited or under development, the supplier shall support cases where employees can meet with management to discuss wages and working conditions without risk of adverse sanctions.

¹ International Labour Organisation (ILO), Fn:s fackorgan för sysselsättnings- och arbetslivsfrågor.

Whistleblowing

The code of conduct and its compliance are of central importance to Botrygg's operations. That's why we have a routine and a system to deal with violations. When employees suspect, or know for a fact, that violations against of the Code of Conduct has been done, they should inform their manager as soon as possible. They may also use the company's whistleblower function which allows anonymity.

The whistleblower function allows complete confidentiality and anonymity. The whistleblower service is open to anyone to use: employees, partners, suppliers, contractors and customers.

[Whistle Blowing | Botrygg](#)

Compliance with the Code of Conduct

The supplier must conduct its business in accordance with what is stated in this Code of Conduct. To ensure this, Botrygg will require that this Code of Conduct be included in the supplier agreements the company signs with us.

Transparency in the supply chain is necessary for Botrygg to be able to guarantee the Suppliers' compliance with this Code of conduct. In order to assess compliance, Botrygg, or a company engaged by Botrygg, will request documentation, conduct on-site audits, review and approve action plans, and monitor implementation of these plans.

Suppliers are obliged to take relevant measures for the content of this Code of Conduct to be implemented within their own operations and in the value chain. If such measures are not taken by the Supplier within the time specified by Botrygg, Botrygg has the right to terminate the agreement with the Supplier with immediate effect.



