

CODE OF CONDUCT FOR SUPPLIERS

Successful sustainability work is built on good relationships and mutual trust between ourselves and you as supplier. We believe in an approach in which the focus is on development and learning, and we welcome a constructive dialogue on these issues. The Code of Conduct includes our expectations of you as supplier. We expect you to do your utmost to work in accordance with this Code, and at the same time to actively endeavour to ensure compliance with it by any sub-contract suppliers that you engage.

You must comply with applicable laws, regulations, instructions and standards, as well as with collective bargaining agreements. You must be in possession of all permits, licences and registrations necessary for the operation.

Guiding principles

Delivery of goods and services shall be made in accordance with the Ten Principles of the UN Global Compact. The principles are based on the UN Declaration on Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration and the UN Convention against Corruption.

Business ethics

Fabege's purchasing activities are characterised by a high level of ethics, respect for human rights, professionalism, objectivity and equal treatment. Encouraging fair competition and acting against all forms of corruption, bribery, money laundering and unlawful restriction of competition form the basis of all our relationships with suppliers.

Work Environment & Safety

You are responsible for ensuring that your own work is planned and organised in such a way that the work environment is safe. Your way of working should systematically and preventively serve to constantly improve the work environment and employee health. The focus shall be on prevention of accidents and occupational injuries, and near-accidents and accidents shall always be reported.

Everyone who works on your behalf must undergo regular training in safety in the work environment. Employees shall receive training regarding any health risks that the work may involve. The employer shall provide appropriate protective equipment and shall ensure that health and safety information is easily accessible in the workplace, in a language that is understandable to all those involved.

The consumption of alcohol and drugs during working hours is not permitted. All those involved in the workplace, irrespective of form of employment or contract, shall be covered by accident insurance.

Terms and conditions of employment

All employees shall have employment contracts in writing. All employees shall have an entitlement to statutory leave, including sickness and parental leave. Employees shall have at least one rest day per week and their working hours shall not exceed the statutory limits, that is, 60 hours per week, including overtime.

Wages/salaries shall be paid regularly, directly to the employee, at the time stipulated and in full. Those who work for you under employment-like conditions shall also be treated in accordance with these principles.

Document title	Date	Approved by	
Code of Conduct for Suppliers	26 Sept. 2016	Group Management	
Responsible for document	Most recent revision	Document code	Page
Dick Larsen	01 Sept 2020	VS	1 (2)



Child labour is not permitted. In the absence of a national law banning child labour in the country where operations take place, it is not permitted for anyone aged less than 15 years to be employed.

The right of employees to organise in trade unions shall be respected, as shall their ability to engage in collective negotiations without fear of punishment, threat or harassment.

All work shall be performed on a voluntary basis, and no form of forced labour, or labour linked to any form of threat or punishment, is permitted. No employees shall be forced to deposit valuables or identity documents with their employer.

Integrity

The Supplier undertakes to act against all forms of corruption, including blackmail and bribery. The Supplier shall not accept, approve a promise of, or request, an unfair advantage, and neither shall the Supplier provide, promise or offer an unfair advantage. For example, the Supplier shall not make, offer, promise or approve payment of money or transfer of other item of value, or give a gift, directly or indirectly.

Environment

You shall work systematically and preventively and shall keep informed of, and have control over, the environmental impact of your operations. An ongoing programme of environmental improvement measures shall be conducted. You are responsible for ensuring that your own work is planned and organised such as to prevent damage or nuisance to land, people and the environment.

The precautionary principle shall be applied in order to reduce emissions into the air, ground and water and to minimise consumption of resources. In material selection, the materials and products chosen shall be those with better environmental characteristics, where functional and quality characteristics are equal.

Human rights

You shall support and respect internationally declared human rights, and shall treat your employees and suppliers fairly, equally and with respect for the equal value of all people.

Discrimination, for whatever reason, is not permitted in recruitment procedures, pay-setting, training, promotion and termination of employment. You shall also ensure that harassment, bullying, threat, oppression or other degrading treatment does not occur.

Whistleblower function

Good relations, a healthy working environment and superior business ethics are crucial to Fabege's long-term success. It is important to us that attention is drawn to corruption, irregularities or fraudulent acts that can seriously damage the business or negatively impact our employees, and that such incidents are investigated at as early a stage as possible. For this reason, we have set up a whistleblower function.

What can I report?

The Fabege whistleblower service is intended for reporting serious irregularities that have to do with:

- bookkeeping transgressions or other financial crime,
- corruption and bribes,
- major shortfalls in safety at the workplace,
- serious incidents of discrimination and/or harassment, and

Document title	Date	Approved by	
Code of Conduct for Suppliers	26 Sept. 2016	Group Management	
Responsible for document	Most recent revision	Document code	Page
Dick Larsen	01 sept 2020	VS	2 (2)



• other serious irregularities that affect the vital interests of the company or the Group, and/or that may pose a threat to the life or health of an individual.

Pursuant to the applicable legislation, the only personal data processed are those that have to do with criminal acts by key personnel or persons in senior executive positions.

Compliance & follow-up

Our ambition is, in consultation with our suppliers, to develop a learning process in the areas included within the Code of Conduct, of which a high degree of transparency and openness are a good starting-point.

By accepting the Code of Conduct, you consent to checks being made regarding compliance with the Code of Conduct. Such checks may be performed by an independent third party.

Document title	Date	Approved by	
Code of Conduct for Suppliers	26 Sept. 2016	Group Management	
Responsible for document	Most recent revision	Document code	Page
Dick Larsen	01 Sept 2020	VS	3 (2)