

# Bravida's Code of conduct



# A word from the CEO

Bravida is a large company with a local presence throughout the Nordic region. Our size and market-leading position come with a responsibility. We aim to be at the forefront when it comes to working environment and ethics, and we strive to be a role model for the entire industry. Our Code of Conduct summarises and clarifies Bravida's values and the rules and guidelines we are to follow in all our actions, whether internally in our workplaces, externally towards customers, suppliers and partners, and when we represent Bravida in the community. The Code of Conduct sets out the basic principles for how we should act and behave on a daily basis and guides our decisions.

It is fundamental to Bravida that we keep our promises, deliver with quality and take financial responsibility. We should be proud of our values and business ethics. All Bravida's employees are subject to and expected to comply with our Code of Conduct, and our suppliers, subcontractors, consultants, agents and other intermediaries must also comply with the parts of it set out in our Supplier Code of Conduct.

Our strength lies in our departments' local business expertise and independence. Based on common values, procedures and tools, we work together to create sustainable and profitable business for ourselves and our customers, as well as a common identity. Due to our size and local presence, we have both an opportunity and an obligation to promote good business ethics and sustainable development.

I am convinced that compliance with our ethical rules and values are key to our success. Taking responsibility in the industry is and will continue to be crucial when it comes to attracting customers, employees and investors.

February 2021  
Mattias Johansson  
President and CEO





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# Bravida's values and the content and purpose of the Code of Conduct

## CARE OF BUSINESS

We are passionate about our business

We constantly aim to enhance customer value and identify new business opportunities

We are cost conscious

We create strong results together

## TAKE RESPONSIBILITY

We are reliable and keep our promises

We never put safety at risk in the workplace

We take responsibility for the environment, customer relations, society and for people

## KEEP IT SIMPLE

We are service minded and easy to work with

We apply group-wide working methods

We work together to deliver effective end-to-end solutions to customers

## BE PROACTIVE

We actively seek out customers, listen attentively and suggest solutions

We think about the future to generate opportunities and avoid risks

We aim to constantly develop and stay one step ahead

## 1.1 Our values

Bravida's values summarise our culture and shared value foundation and form the basis of the principles set out in this Code of Conduct

## 1.2 Purpose of the Code of Conduct

Ethics is a key part of our values. The Code of Conduct describes the meaning of our four values in greater detail and will help to make it clearer and easier to work towards common goals and a common culture — both in our internal cooperation and in our relationship with the surrounding world. Bravida supports the ten principles of the UN Global Compact. The Code of Conduct is partly based on these principles and builds on Bravida's values and positions on business ethics, human rights and working conditions, customers and quality, and environment and sustainability.

We strive to build relationships with customers, suppliers and partners in accordance with our values as well as with the laws, rules and regulations that apply to our market and our business.

We impose the same demands on our business partners as on ourselves and aim to avoid partnerships with customers and suppliers who do not support Bravida's values. Bravida's Supplier Code of Conduct must always be included in the content of agreements entered into with these parties.

## 1.3 Ethical dilemmas

If you are faced with an ethical dilemma, we recommend you ask yourself the following questions:

1. Is it legal?
2. Is it respectful and in accordance with our values and the principles of the Code of Conduct?
3. Would I feel comfortable explaining my actions to my colleagues, manager, subordinates or family?
4. Could I defend my actions if they were made public in the media or on social media?

If the answer to any of these questions is no, you must not proceed with the decision. If the answer to all of these questions is yes, you may proceed with the decision. If you are unsure, you should seek advice before deciding on the matter.

Ethical matters can be difficult and there isn't always a clear-cut answer. Bravida has therefore established a business ethics council, consisting of people from the company's management and representatives from Sweden, Denmark, Norway and Finland. Employees may refer to this council to raise and discuss issues, for guidance and to report irregularities.

In addition to this, the business ethics council should monitor the business and carry out training initiatives. The members of the business ethics council can be reached via Bravida's intranet.

## 1.4 Breaches of the Code of Conduct and reporting of violations

Bravida never accepts unethical behaviour. If you act unethically and thus in violation of the Code of Conduct or other relevant laws, rules and guidelines, you will be subject to disciplinary action which, depending on the seriousness of the offence, may result in dismissal and/or other consequences. Bravida will take immediate action in the event of such behaviour, even if it means a lost business opportunity or lower profit in the short term.

If you discover or suspect a breach of the Code of Conduct, you must report it to your manager or to your manager's manager. You can also always contact someone at HR, Bravida's chief legal officer or a member of the business ethics council.

If, for any reason, you do not feel comfortable with any of the options above, you can submit an anonymous report through our whistleblowing function, which can be accessed via our website: <https://www.bravida.se/om-bravida/bravida-way/vara-varderingar/visselblasare/>. Under no circumstances does Bravida tolerate reprisals against employees who report a breach of the Code of Conduct in good faith.

## 2 Working conditions

### 2.1 Human rights, forced labour, child labour and freedom of association and organisation

It is a fundamental and self-evident prerequisite for the business that we:

- (i). support and respect international human rights and ensure that we are not involved in human rights violations
- (ii). uphold the freedom of association and organisation for all of Bravida's employees and recognise the right to collective bargaining
- (iii). do not permit any practices that restrict the employees' free movement, nor any forced labour or child labour of any kind within Bravida.

### 2.2 Working conditions from a gender equality and diversity perspective

By promoting gender equality and diversity, Bravida makes the most of employees' differences, skills and experience. Bravida should be a workplace that welcomes and respects all employees, irrespective of gender, transgender identity or expression, ethnicity, religion or other beliefs, disability, sexual orientation or age.

Bravida should be a workplace where all employees have equal opportunities for training and skills development. The Bravida School enables further improvement with regard to gender equality and diversity. Bravida should have a corporate culture that offers equal opportunities for male and female colleagues to combine work with parenthood.

### 2.3 Zero tolerance of harassment and discriminatory treatment

Bravida applies a zero-tolerance policy when it comes to harassment and discriminatory treatment.

All our employees should be shown respect regardless of gender, transgender identity or expression, ethnicity, religion or other beliefs, disability, sexual orientation or age. Moreover, we do not tolerate reprisals of any kind against employees who report harassment or discriminatory treatment.

### 2.4 Health and safety

Bravida endeavours to have a positive and safety-aware corporate culture that ensures that our employees are happy at work and come into work healthy and well. We aim to eliminate all work-related physical and mental ill health. All Bravida employees have a responsibility to create, develop and maintain a safe and healthy working environment. Achieving this requires a mutual effort together with our customers, consultants, suppliers and other stakeholders at our workplaces. This means that Bravida's employees:

- put safety first
- follow the applicable workplace rules and guidelines and Bravida's governing documents on health and safety
- actively communicate on safety and working environment issues with customers, employees and suppliers
- are informed of the risks that exist in the relevant working environment
- plan work so as to minimise health and safety risks and keep these within acceptable limits
- are mindful of the impact on surroundings and users.



## 2.5 Leadership

Bravida believes in the importance of practising developing leadership. For you as a leader, this means setting a good example and leading in accordance with our common values and our seven leadership criteria.

Bravida's managers, leaders and employees have a responsibility to build a culture together and comply with our Code of Conduct and its frameworks.

Our seven leadership criteria summarise how we view management and leadership respectively, and what we expect of you as a manager:

1. Expressing clear expectations
2. Driving, planning, following up and providing feedback
3. Representing the company and acting as a role model
4. Showing courage and commitment
5. Being communicative and clear
6. Providing coaching and support
7. Being open and present

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# Environment and sustainability

– Bravida contributes to building a sustainable society

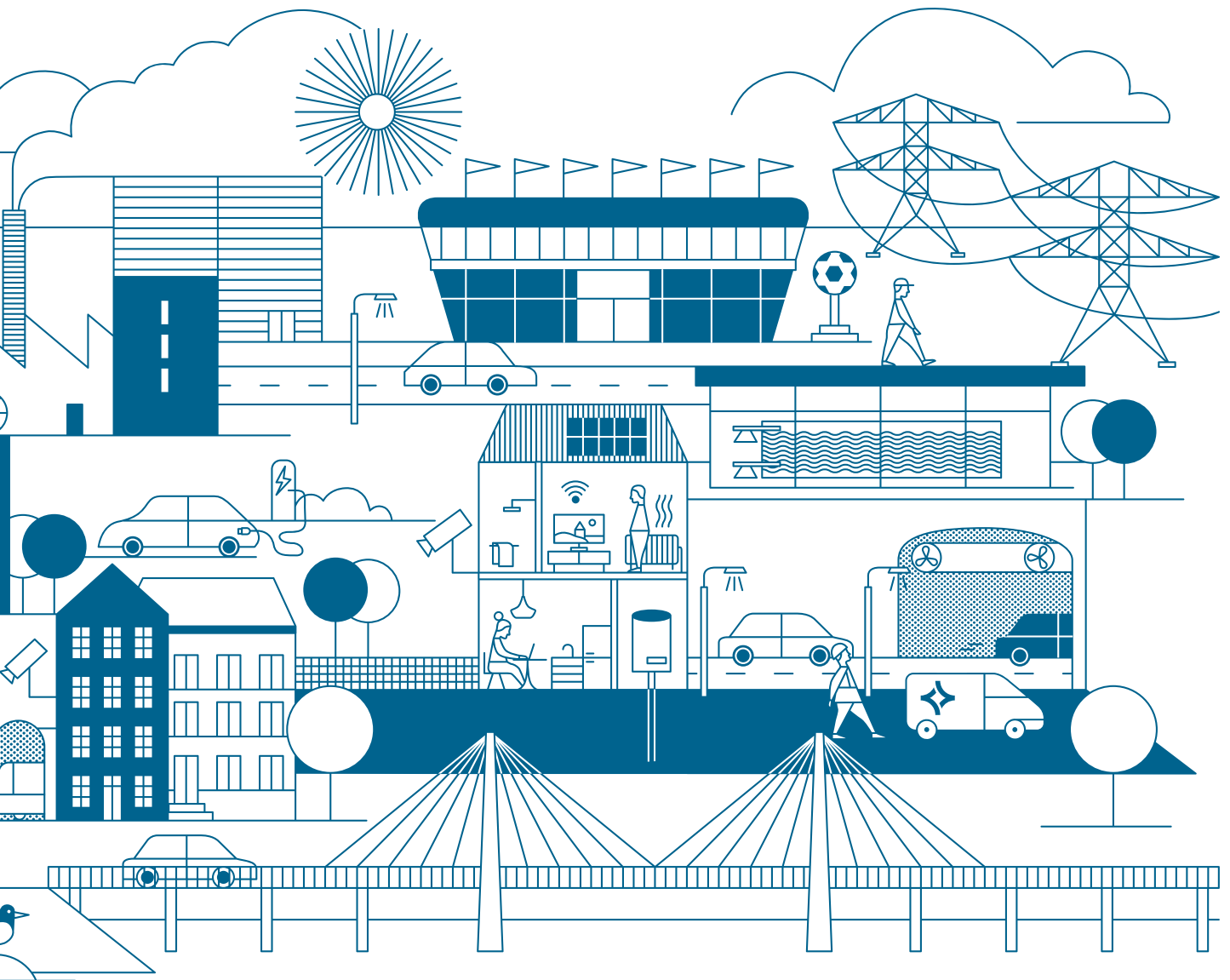
**Bravida makes it possible for customers to develop properties to their full potential. Through service and installation, we give properties life and lead the way towards a sustainable and resilient society. Together, we help our customers create climate-smart solutions that last for the entire life cycle of the property. As a company involved in urban development, we take responsibility for our solutions and for how we deliver our work.**

This means that we:

- offer our customers environmentally efficient installation and service solutions that reduce energy and resource consumption
- inform our customers about current and future energy and environmental requirements and suggest ways of making their facilities more energy-efficient, including which measures should be prioritised
- take active steps to reduce our own environmental impact and continually improve our environmental work through clear
- goals and ongoing performance monitoring
- train and incentivise employees and collaboration partners to plan and carry out their work in a sustainable manner
- impose requirements on suppliers and partners to provide environmentally sustainable materials, products and services
- comply with society's and our customers' environmental demands and participate in research and development that boosts our ability to offer innovative and sustainable solutions.







# 4

## Business ethics and external business relationships

**We aim to nurture our relationships with our business partners. We primarily do this by always delivering on our promises. We believe in competition and that all decisions, both internally and in relation to our business partners, are based on professionalism. We should never circumvent our business partners' decision-making processes or seek to improperly influence them.**

### 4.1 Customers and quality

Our interaction with customers should always reflect our values and be based on trust, responsibility, commitment and competence.

We always supply products and services of the right quality that meet, and ideally exceed, customer expectations and create added value for customers. This is achieved through a clear division of responsibility, with all employees contributing their expertise.

Quality means meeting the demands of customers and society and focusing on continuous improvement through development, training and systematic transfer of experience. Our services and deliveries should be characterised by high customer value.

### 4.2 Competition

We do not accept either ourselves or any of our business partners acting a way that could unlawfully influence free competition. We do not participate in any form of price collusion, cartel formation or in any other measures that contravene competition rules, such as unauthorised tendering. Bravida supports healthy, free competition.

For example, competitors are not permitted to coordinate their actions toward customers, divide markets or directly or indirectly agree on restrictions on production or sales, prices, price recommendations,

discounts or other delivery conditions. Great care should be taken when meeting with trade associations and in other contacts with competitors, and the above topics should not be discussed.

Cooperating with competitors in order to submit joint tenders as part of procurement processes is normally not permitted. All collaborations with competitors must be approved by Bravida's legal department.

### 4.3 Anti-corruption

#### 4.3.1 Business relationships without personal gain

The giving and receiving of gifts and other benefits between customers and suppliers could be regarded as bribery. This also applies to inviting people to events or activities. Bribing someone, i.e., giving someone something with the intention of improperly influencing that person, is a serious crime carrying significant penalties.

It can sometimes be difficult to determine the boundary between what does and does not constitute acceptable and proper business conduct. We should always exercise caution and moderation when giving or receiving gifts. This also applies when we extend invitations to customer events or other activities.

Particular restraint must be observed in dealings with public sector parties, especially those that directly or indirectly exercise public authority or make public

procurement decisions. Such persons must not be offered gifts and other benefits.

We should therefore always:

- act in a way that avoids us and our business partners becoming dependent on each other
- be highly restrictive with regard to gifts and benefits to and from business partners, and completely avoid giving gifts and other benefits to persons who directly or indirectly exercise public authority or make public procurement decisions
- avoid allowing business partners to pay for our travel, meals or accommodation, and avoid paying similar expenses for our business partners.

We aim to base all our relationships on professionalism, for the benefit of Bravida and our business partners and without personal gain for those involved.

#### 4.3.2 Travel, training courses and conference

We do not organise any travel, training courses or conferences with our business partners that are not directly related and relevant to Bravida's business.

Participation in travel, training courses or conferences arranged by our business partners should always be approved in advance according to the "grandfather principle". The grandfather principle means that, in deviation from the normal decision-making and authorisation procedures, the measure in question must be approved by the manager's manager. We do not organise training courses or conferences that are held outside the Nordic region. Necessary travel outside the Nordic region must be approved by the group's chief legal officer and according to the grandfather principle.

The basic rule is that we and our business partners must pay for our own accommodation and travel.

#### 4.3.3 Hospitality

All hospitality must be characterised by moderation, transparency and professionalism. We do not allow Bravida to pay for hospitality that is not directly work-related and does not offer business benefit. Business benefit means something that the recipient benefits from professionally. Transparency means that we must ensure that those participating in hospitality events have their employer's approval and that we report the costs and programmes correctly. All hospitality must always be authorised by a superior staff member who was not present. This means that the payment must be approved by the highest-ranking staff member in the situation in question.

Bravida's Guidelines on Gifts and Hospitality, provides further details on what is and is not acceptable by providing a number of scenarios.t.

### 4.4 Sanctions

Bravida complies with the international sanctions applicable at any given time. Sanctions prohibit business with certain countries, individuals, entities or sectors and are used by governments and other bodies to influence foreign affairs. Sanctions lists are issued by the UN, EU and US, among others. It is prohibited to do business directly or indirectly with countries or regions subject to sanctions, and it is also prohibited to do business or cooperate in any way, either directly or indirectly through third parties, with any person or entity included on a sanctions list.

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## Appropriate internal conduct

### 5.1 Conflicts of interest

Conflicts of interest between employees and the company must be avoided. This means that we must avoid engaging business partners or employing persons where close personal relationships exist. Bravida must also avoid sponsoring activities in which the Bravida employee making the sponsorship decision has a personal interest. In other words, Bravida must not sponsor activities that primarily benefit any employee of Bravida or his/her close associates. If personal interests could influence a decision, the matter must be handed over to the line manager for a decision. Our employees may not exploit relationships with business partners for their own benefit.

### 5.2 Management of internal resources

As an employee at Bravida, you are expected to manage Bravida's resources responsibly. Bravida's authorisation procedures must always be followed. Internal hospitality must also be moderate and predominantly of benefit to business. Internal hospitality must be characterised by transparency and authorised by a superior staff member who was not present. Costs of internal activities must be reasonable.

Our own training courses and conferences that are not arranged by The Bravida School, and that are not part of a wider training programme, must always be set out with a detailed programme and approved in advance according to the grandfather principle. We do not organise training courses or conferences that are held outside the Nordic region. Necessary travel outside the Nordic region must be approved by the group's chief legal officer and according to the grandfather principle.

### 5.3 Purchasing

The ordering and supply of items must always be related to a customer assignment and marked with a work order number. Delivery must always be made directly to the customer. If materials are returned (surplus) they should be sent back to the supplier and the cost credited to Bravida.

We may not use the company's purchasing terms and discounts for personal gain. Large purchases must always be approved by a line manager. No private purchases may be invoiced to Bravida, even if you pay the invoice yourself. Using the company's suppliers for personal gain could lead to labour law-related measures or tax costs and could also be punishable by law.

### 5.4 Data security and personal data

We must be careful with all information we gain access to regarding our business. Confidential information received in the course of work must be respected and treated with care.

Confidential information about our business or business partners, including customers and suppliers, must not be disclosed to unauthorised persons. We must always adhere to our agreed commitments. For example, information about a supplier's terms and conditions must never be disclosed to another supplier. If any of our business partners breach these guidelines, we will take appropriate action.

Personal data must be processed in accordance with the General Data Protection Regulation (GDPR) and pursuant to separate guidelines adopted by the company.



We bring  
buildings to life.

