

# Code of Conduct for Suppliers



This Code of Conduct for suppliers was adopted by the Board of Directors of Castellum AB (publ) on 5 May 2025.



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# 1. Code of Conduct for suppliers

Conducting Castellum's operations responsibly is crucial for the company's long-term success. Castellum's responsibility applies to all employees, tenants, suppliers and other partners.

Sustainability has always been a natural part of Castellum's operations and Castellum expects suppliers to also promote sustainable development. In new purchases and projects, Castellum ensures that suppliers also take social responsibility for a sustainable society.

A good relationship is built on confidence and it is important that others in the environment can trust Castellum. All employees at Castellum need to be professional in their conduct at every stage and to follow Castellum's Code of Conduct. Castellum has the same high expectations for suppliers as for all employees in the Group. This is why the company has developed this Code of Conduct for suppliers ("the Supplier Code"). Castellum expects suppliers to meet the expectations in the Supplier Code are also met by subcontractors.

The Supplier Code is based on the ten principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights. The headings in the Supplier Code are based on the four areas in the UN Global Compact (human rights, labour, environment and anti-corruption) but Castellum's own identification of the most relevant sustainability issues is what forms the basis of the content of the Supplier Code.

As one of Castellum's suppliers, you have an important role when it comes to helping us meet our own expectations for sustainability and contributing to a more sustainable societal development.

# 2. Regulatory compliance

Suppliers to Castellum are to follow the national laws, regulations, provisions and standards that apply in the countries where the suppliers conduct their operations. Castellum's suppliers are to obtain all of the necessary permits, licenses and registration for their operations.

Suppliers are to follow the UN Global Compact and treat their employees and subcontractors fairly, equitably and with respect for their equal rights.

Anyone working for a supplier under employment-like conditions is also to be treated according to the principles stipulated in the Supplier Code.

# 3. Human rights

The supplier is to respect internationally recognised human rights and not cause, participate in or otherwise be connected to any negative impact on human rights through its business operations.

## 4. Work conditions

### 4.1 Non-discrimination and fair treatment

Diversity is something to strive for and equality is self-evident. No discrimination is permitted based on ethnicity, sex, religion or other belief, disability, sexual orientation, transgender identity or expression, age or social origin. Suppliers must respect and safeguard the personal integrity of employees by ensuring that personal data is collected, stored, processed, and protected confidentially and in accordance with applicable laws, regulations, and data protection provisions.

Suppliers must also ensure that harassment, bullying, threats, undue pressure or other forms of victimisation do not arise in their operations.

### 4.2 Freedom of association

Suppliers are to respect their employees' right to organise in unions and their ability to collectively bargain and engage in social dialogue without risk of punishment, threat or harassment.

### 4.3 Employment contracts

All employees are to have written employment contracts translated to a language that they understand.

### 4.4 Salary

Salaries are to be paid directly to the employee at the appointed time and in full. Salary deductions are not permitted as a disciplinary measure. The legally established minimum wage is the lowest permissible salary level.

### 4.5 Working hours

All employees are entitled to statutory leave, including sick leave and parental leave. Working hours, including overtime, is not to exceed the maximum working hours specified by applicable laws and provisions. All employees are entitled to statutory weekly rest or at least one rest day per week. Suppliers must ensure the maintenance of a healthy work-life balance to promote employee well-being and productivity.

### 4.6 No child labour

Child labour must not occur. The minimum employee age is always 15 or applicable higher statutory minimum ages. Young people between the ages of 15 and 18 can perform non-hazardous work tasks, provided that they have reached the legal age for work and have undergone national compulsory education, or if such tasks permit compulsory education to be pursued in parallel.

### 4.7 No forced labour

All work is voluntary. No form of forced labour or labour connected with any form of threat or punishment is permitted. No employee is to be forced to deposit valuables or identification papers with their employer.

## 4.8 Work environment

The work environment fulfils legal requirements and agreements and is safe and sound in terms of physical, mental and social health. The supplier is to work systematically and preventively to constantly improve the work environment and support the health of their employees. Suppliers must ensure that employees working away from their usual place of residence have access to suitable and safe housing, as well as clean drinking water and adequate sanitary facilities.

Accidents and injuries are to be prevented. All employees, regardless of their form of employment or contract, are to be covered by accident insurance. Any accidents that occur while carrying out work on behalf of the Castellum group are to be reported directly to the procuring individual at Castellum, without delay, who will then report the issue to Castellum's Compliance function.

Employees are to be informed of any health risks that work may entail. Employees are to be educated about any health risks that work may entail, including fire safety, hazardous work tasks and first aid. Employees are to have access to, and use, relevant protective equipment. Important information is to be readily available in a language the employee comprehends. The supplier is to ensure that no alcohol or drugs are consumed during work hours at the workplace.

## 5. Environment

### 5.1 Climate and environmental impact

The supplier is to take the environment into consideration when conducting their operations and to follow applicable environmental laws and regulations. The supplier is to have checks and procedures to identify, measure and follow up on its environmental and climate impact and to systematically work to constantly improve its environmental and climate performance.

### 5.2 Product issues

The supplier is to ensure that there is sufficient data and certificates to meet the relevant requirements for the use of products and materials in Castellum's operations and properties.

### 5.3 Use of resources

Suppliers are to strive to reduce the environmental and climate impact from their products and services in terms of a life-cycle perspective and to set environmental and climate requirements for the subcontractors they hire. All waste, particularly hazardous waste, is to be handled responsibly and in line with local provisions.

### 5.4 Precautionary principle

The precautionary principle is to function as the basis for environmental work, which is to be long-term and holistic in nature. Consideration is to be given to the environment in all decision processes.

## 6. Business ethics and anti-corruption

### 6.1 Sound business practices

The supplier's operations are characterised by a high level of business morals, sound business practices, accountability and impartiality.

### 6.2 Fair competition

Collusive pricing, cartels or abusing market position are not permitted.

### 6.3 Anti-corruption

Suppliers are to always avoid risks of breaching bribery legislation and other undue influence. This means that no supplier may provide, promise or offer an undue benefit – or receive, approve a promise or request an undue benefit in exchange for carrying out employment or an assignment. Requesting or providing any form of promise in connection with a benefit is not permitted. Representation and gifts are to be characterised by openness, moderation and must always have a natural connection with the recipient's profession and the prevailing business relationship between the parties. Special restrictions apply in relationships with individuals within the public sector in general, particularly those who exercise authority or work with public procurements.

### 6.4 Money laundering

Operations at suppliers are to be based on prevailing regulations to ban and prevent money laundering. This includes having a good understanding of who the supplier does business with (Know Your Customer).

### 6.5 Confidential information

If a supplier has access to information that is confidential or company internal for Castellum or Castellum's customers, it is to be processed responsibly. Sharing confidential information with unauthorised parties is not permitted. Confidential information pertaining to operations at Castellum or Castellum's customers is only to be used for its intended purpose.

### 6.6 Inside information

Inside information is information of a specific nature that has not been published, which directly or indirectly pertains to an issuer or a financial instrument, such as Castellum or Castellum's share traded on the Stockholm stock exchange, and that, were it to be published, would likely have a material impact on the price of the financial instrument or related financial instruments. The information, which can pertain to Castellum's operations or other factors that indirectly affect Castellum or financial instruments issued by Castellum, is to be handled as strictly confidential. Anyone who, either from Castellum or anyone else, has access to inside information pertaining to Castellum or Castellum's financial instruments, is not permitted to trade in Castellum's financial instruments themselves or on someone else's behalf, nor recommend or enable another person to trade in the same.

## 6.7 Conflicts of interest

Employees of a supplier are to handle personal and financial interests so that they do not conflict, or be perceived to conflict, with the supplier's business operations. Relationships with business partners, such as subcontractors, are not to be exploited for an employee's personal gain.

## 6.8 Tax matters

Tax laws and regulations are to be followed. If tax legislation does not provide clear guidance, the guiding principles are accuracy and openness.

# 7. Document owner

Castellum's Supplier Code is to be revised on a regular basis and adopted by the Board at least once each year. The CEO of Castellum AB is the document owner and responsible for the Supplier Code. Revisions are made by Castellum's Chief Sustainability Officer.

The Regional Managing Directors of each region are responsible for this Supplier Code and its implementation. The Regional Managing Director is also responsible for ensuring that all employees at Castellum have information about the Supplier Code.

# 8. Implementation and monitoring

Through partnerships, dialogues and support, Castellum wants to work with its suppliers to ensure compliance with the Supplier Code.

Measures must be taken if a supplier fails to meet any of the expectations in the Supplier Code. In cases where Castellum discovers that the supplier has not rectified the situation despite repeated requests, it may constitute grounds for Castellum terminating the partnership.

In cases where deviations from the Supplier Code have been identified, there is a whistleblower service ("Visselblåsning") that is administered by an external partner to ensure anonymity and professionalism. The whistleblower service can be reached on all of the Group's website. The goal of the whistleblower service is to ensure that a correct investigation is carried out and that measures can be taken without any fear of reprisals against the reporting party.