



Supplier Code of Conduct

This Code of Conduct for Suppliers was approved by the Board of Castellum AB (publ) on June 15, 2022.

Table of contents

1. Code of Conduct for Suppliers	2
2. Regulatory compliance	2
3. Human Rights	2
4. Working Conditions	3
4.1. Anti-discrimination and fair treatment	3
4.2. Freedom of association	3
4.3. Employment contracts	3
4.4. Salary	3
4.5. Work time	3
4.6. No child labor	3
4.7. No forced labor	3
4.8. Work environment	4
5. The Environment	4
5.1. Climate and environmental impact	4
5.2. Product issues	4
5.3. Use of resources	4
5.4. Precautionary principle	4
6. Business ethics and anti-corruption	5
6.1. Sound business practices	5
6.2. Fair competition	5
6.3. Anti-corruption	5
6.4. Money laundering	5
6.5. Confidential information	5
6.6. Inside information	5
6.7. Conflicts of interest	6
6.8. Tax issues	6
7. Document owner	6
8. Implementation and follow-up	6



1. Code of Conduct for Suppliers

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

Sustainability has always formed a natural part of Castellum's operations, and Castellum also expects suppliers to contribute to sustainable development. Concerning new projects, Castellum prefers to see that suppliers also take social responsibility for a sustainable society.

A sound relationship is based on trust, and it is important that external parties can rely on Castellum. All employees have to be professional in their conduct at every level and must follow the Castellum's code of conduct. Castellum places the same high ethical requirements on suppliers as on all Group employees. For this reason, Castellum has formulated this Code of Conduct for Suppliers (the "Supplier Code"). Castellum expects that suppliers will ensure that any subcontractors engaged also comply with the Supplier Code.

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 Supplier Code's headings are based on the four areas governed by the UN Global Compact (human rights, working conditions, environment and anti-corruption). However, Castellum's own identification of the most relevant sustainability issues underpins the content of the Supplier Code.

As one of Castellum's suppliers, you have an important role to play in us successfully achieving our expectations within the area of sustainability and to contribute to more sustainable social development.

2. Regulatory compliance

All Castellum suppliers have to comply with the national laws, regulations and standards applicable in the countries in which the supplier operates. Castellum's suppliers must hold all permits, licenses and registrations required for operations.

Suppliers will support and respect the UN Global Compact and treat their employees and subcontractors fairly, impartially and with respect for human equality.

Those who work for the supplier under employment-related conditions should also be treated in accordance with the principles stated in the Supplier Code.

3. Human Rights

Suppliers must respect internationally recognized human rights and not cause, contribute to, or be linked with any negative impact on human rights, through their business operations.

4. Working Conditions

4.1. Anti-discrimination and fair treatment

We strive to promote diversity and equality is self-evident. Discrimination on the basis of ethnicity, gender, religion or other beliefs, disability, sexual orientation, transgender identity or expression, age or social origin is not permitted.

Suppliers are also to ensure that harassment, bullying, intimidation, oppression or other degrading treatment does not occur in their operations.

4.2. Freedom of association

Suppliers must respect the rights of employees to organize as labor unions, as well as their possibility to bargain collectively without fear of punishment, intimidation or harassment.

4.3. Employment contracts

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

4.4. Salary

Salaries are paid directly to employees at the stipulated time and in full. Deductions from wages as a disciplinary measure are not permitted. The statutory national minimum wage is the lowest acceptable salary level.

4.5. Work time

All employees are entitled to statutory leave, including sickness and parental leave. Working hours, including overtime, may not exceed the maximum working hours specified by current legislation and regulations. All employees are entitled to statutory weekly rest or to at least one day of rest per week.

4.6. No child labor

Child labor is not permitted. The minimum age is always 15 years, or the applicable higher statutory minimum age. Young people between 15 and 18 years of age may work with non-hazardous tasks, provided they have reached the legal age to work and have completed national compulsory schooling, or if the work allows for compulsory schooling to be conducted in parallel.

4.7. No forced labor

All work is to take place voluntarily. No form of forced labor or labor linked with any form of intimidation or punishment is permitted. No employees may be forced to deposit valuables or identity papers with their employer.

4.8. Work environment

The work environment has to comply with laws and agreements, while remaining safe and sound from a physical, mental and social perspective. Suppliers will work systematically and proactively to continuously improve employee work environments and health.

Actions are to be taken to prevent accidents and injuries. All who are active in the operation, regardless of employment or contractual form, are to be covered by accident insurance. Any accidents occurring while carrying out work for the Castellum Group have to be reported directly and without delay to the buyer at Castellum who will then report the issue to Castellum's compliance function.

Employees will be informed about any possible health risks that the work may entail. Employees will receive training on the possible health risks that the work may entail, including fire safety, hazardous work and first aid. All employees will have access to, and use, the appropriate protective equipment. Essential information is to be readily available in a language that the employee fully understands. The supplier will ensure that alcohol and drugs are not used during working hours at the workplace.

5. The Environment

5.1. Climate and environmental impact

Suppliers will conduct business with respect for the environment and comply with current environmental legislation. Suppliers will maintain an effective overview of, and routines for, identifying, measuring and monitoring their environmental impact and, moreover, will work systematically to continuously improve their environmental performance.

5.2. Product issues

Suppliers will ensure that the required data and certificates are available in order to meet relevant requirements for the use of products and materials at Castellum's properties.

5.3. Use of resources

Suppliers will strive toward a life-cycle perspective regarding the environmental impact of products and services, and set environmental requirements for any subcontractors they engage. All waste – especially hazardous waste – must be handled responsibly and in compliance with local regulations.

5.4. Precautionary principle

Environmental efforts start from the precautionary principle and are characterized by a long-term, holistic approach. Respect for the environment is part of all decision-making processes.

6. Business ethics and anti-corruption

6.1. Sound business practices

Supplier business operations are to be characterized by high business ethics, sound business practices, accountability and impartiality.

6.2. Fair competition

No form of price collusion, cartel or abuse of market position is permitted.

6.3. Anti-corruption

Suppliers must always avoid the risk of breaching legislation on bribery and other undue influence. It means that no supplier may give, promise or offer an inappropriate benefit, or receive, accept a promise or request an inappropriate benefit for carrying out duties or assignments. It is not permitted to demand or give any form of promise in connection with a benefit. Entertainment and gifts should be characterized by openness and moderation, and they should always have a natural connection with the recipient's professional activity and the business relationship between the parties. Particular restrictiveness applies in relation to individuals in the public sector in general, and to individuals exercising public authority or dealing with public procurement in particular.

6.4. Money laundering

Suppliers' business activities are to be conducted in accordance with current regulations on the prohibition and prevention of money laundering. This means, inter alia, that suppliers must always have thorough knowledge of the counterparties with whom they do business.

6.5. Confidential information

If the supplier has access to confidential or internal company information relating to Castellum or Castellum's customers, this information must be handled in a responsible manner. Confidential information may not be disclosed to unauthorized parties. Confidential information relating to Castellum's or its customers' activities may only be used for its intended purpose.

6.6. Inside information

Inside information is information of a *specific nature* that has not been released. It relates directly or indirectly to an issuer or a financial instrument – e.g. Castellum or the Castellum share traded on the Stockholm Stock Exchange – that would probably result in a *significant impact* on the price of these financial instruments or on related financial derivative instruments, had it been disclosed. The information, which may be attributable to Castellum's operations or to other factors that indirectly affect either Castellum or financial instruments issued by Castellum, is to be treated as highly confidential. Any party who gains access to inside information attributable to Castellum or to Castellum's financial instruments from Castellum or another party, is not permitted to trade on their



own or another person's behalf nor recommend or induce another person to trade with Castellum's financial instruments.

6.7. Conflicts of interest

Employees of the supplier are to manage their personal and financial interests in such a manner as to ensure that they do not conflict with or could be perceived as conflicting with the supplier's operations. Relationships with business partners, such as subcontractors, may not be utilized for the employee's own personal gain.

6.8. Tax issues

Tax laws and regulations must be adhered to. Where the tax code does not provide clear guidance, the guiding principles are accuracy and transparency.

7. Document owner

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

In each region, the Regional Managing Director is responsible for the Supplier Code as well as for its implementation. The Regional Managing Director is also responsible for ensuring that all Castellum employees receive information about the Supplier Code.

8. Implementation and follow-up

Castellum wants to work with suppliers through collaboration, dialogue and support to ensure that the Supplier Code is adhered to.

If a supplier does not live up to the requirements of the Supplier Code, this will have to be rectified. Discovery that a supplier does not fulfil its undertakings to Castellum, despite comments, will constitute reason to terminate the collaboration.

In cases where deviations from the Supplier Code are identified, a whistleblower service is provided ("Help us do the right thing"), which is administered by an external party to ensure anonymity and professionalism. The whistleblower service can be accessed through all Group websites. The aim of the whistleblower service is that a proper review will be conducted and actions can be taken without any concern about reprisals against the reporting person.