

Code of Conduct

Background and purpose

Our code of conduct forms the basis for how we as employees at NP3 Fastigheter act – towards each other, our customers, shareholders, suppliers, business partners and society at large. It reflects our core values and is an expression of our commitment to business ethics, sustainability and taking responsibility.

As a listed company, we have a special responsibility to maintain the confidence of the market and our stakeholders. Therefore, we expect all employees and board members to act in accordance with this code.

Together with NP3's sustainability policy, the code of conduct forms the basis for the company's sustainability work.

NP3's code of conduct for suppliers is based on Fastighetsägarna's [Swedish Property Federation] code of conduct, which is a joint proposal for the real estate sector. Goods and services supplied must comply with the 10 principles of the UN Global Compact (www.unglobalcompact.org). These principles are based on the UN Declaration of Human Rights, the ILO's fundamental conventions on human rights at work, the Rio Declaration and the UN Convention against Corruption.

Scope

The code of conduct applies to all employees, regardless of their form of employment. Board members are also covered by the code of conduct. All new employees are trained in the code as part of their induction training.

Focus areas:

- **Work environment and safety**
- **Equality and Diversity**
- **Tenants**
- **Suppliers and Business Partners**
- **Events and entertainment**
- **Owners and Investors**
- **Market Dealings**

Work environment and safety

NP3 offers a safe, healthy and inclusive work environment for all employees. Everyone has the right to work in safe conditions, free from the risk of accidents, ill health, harassment or discrimination. We comply with applicable laws and regulations for work environment and safety, and continuously work to prevent risks and improve our procedures. Every employee has a responsibility to contribute to a safe workplace by following safety instructions, reporting incidents and showing consideration for their colleagues. A good work environment is created in collaboration and is a prerequisite for well-being at work, commitment and quality in our work.

Equality and Diversity

At NP3, equality is a matter of course. It contributes to better quality, efficiency, innovation and profitability. A common staff skills base and impetus are needed to drive development and improvement initiatives in our

company. Our tenet is the principle that everyone is of equal value, and that all employees should have the same opportunities, rights and obligations. Our work atmosphere must be characterised by respect and fair conditions between individuals and groups. Nobody must be subjected to discrimination due to their gender, transgender identity or expression, ethnicity, nationality, disability, religion or other belief, sexual orientation or age. NP3 has zero tolerance for degrading treatment such as discrimination and sexual harassment.

Tenants

All tenants must be treated equally with respect and understanding in all dealings. Information about a tenant, whether a natural or legal person, is confidential, and this also applies to anyone we have a relation with who is not a customer. It is prohibited to transfer information about a tenant's circumstances to any unauthorised third party. The duty of confidentiality also applies after the end of work or contractual relations.

Suppliers and Business Partners

Procurement of products and services shall be conducted with business integrity and with regard to price, quality and sustainability. NP3 imposes environmental requirements when procuring products and services from contractors and suppliers, and requires suppliers to comply with laws and fundamental principles on human rights, working conditions, the environment and ethics.

We always take responsibility towards our customers and ensure that our partners comply with their statutory obligations. NP3 has zero tolerance for corruption and financial irregularities, e.g. bribes, unauthorised commission, fraud, embezzlement and money laundering.

Events and entertainment

An event that is aimed at a larger circle of people, and is of use to those attending the event in their positions, is normally allowed, as long as it cannot be construed as extravagant. It is always prohibited to invite or be invited by persons who are closely associated to you. Such persons must always pay the normal market price. A prerequisite for accepting any form of entertainment is that it is not regularly offered, but can be offered to the same recipient on rare occasions. Internal entertainment must always have the consent of the immediate supervisor.

Owners and Investors

NP3 strives for an open, transparent and relevant dialogue between shareholders, analysts and investors. We are responsible for giving fair and easily accessible information to our shareholders and other stakeholders. All communication must be aimed at building confidence, creating long-term relations and countering speculation and rumours. We comply with the rules and regulations that govern listed companies, and the practices employed by the financial market.

Market Dealings

As an employee at NP3, you have a major role to play in how our brand name is perceived and developed.

- **Utilities**

Dealings with the media must always go through the CEO or a manager, who ensures that the right person makes any statements. Dealings with the media must be characterised by transparency, objectivity, speed and relevance.

- **Competent authorities**

Any information that we give to a competent authority must always be correct, relevant and based on established facts.

- **Social media**

When using social media, employees at NP3 have the same freedom of expression as any other private individual. However, as an employee you have a responsibility not to use social media privately in such a way that it can be understood that you are a spokesperson for NP3, as your opinions can affect NP3's brand name.

Compliance and follow-up

- All questions concerning the interpretation of the present policy must be sent to the CEO.
- Any suspicion of a violation of the present policy must be reported to a company manager.
- By being employed at NP3, you as an employee consent to follow this conduct in its entirety.

Whistle-blowers

In the event that an employee, partner, supplier or subcontractor suspects that there is a breach of laws, regulations, or this code of conduct, a whistleblower function is available on NP3's website to file an anonymous report.