

Code of Conduct

NP3 supports and works in line with the Real Estate sector's code of conduct.

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NP3's code of conduct is based on the company's values and gives guidance as to how company employees should act and take correct decisions in their daily work. NP3 is dependent on the outside world having confidence in the company, so all employees must always conduct themselves in a professional manner, and with the company's core values in mind, when they meet tenants, investors, business partners, suppliers and colleagues.

The code of conduct is the company's main policy document for sustainability and constitutes, along with NP3's sustainability policy, the basis for the company's sustainability work.

Our core values must permeate our corporate culture and guide us in our daily work to adopt a common approach. As an employee, you are expected to share our values and comply with the code of conduct, which means that everyone is responsible for setting a good example. All new employees are informed about the code as a part of their introduction.

Our code of conduct should contribute to:

- Our employees having a feeling of responsibility and making the right decisions based on good business ethics.
- We work towards a consensus on what is acceptable behaviour – and what is not – with the aim of creating long-lasting relations and sustainable properties and projects.
- We develop good relations and prevent unsound dependency towards our stakeholders

The code of conduct is not the be-all and end-all as to how employees should conduct themselves in different situations. Always use your common sense and let the questions below guide you in your decisions.

- What does the law, internal policies and work procedures say about my actions?
- How would a model employee act?
- Can I stand by my actions?
- Can the way I'm acting negatively affect NP3's reputation or confidence in the company?
- Are my actions ethical?

If a difficult or contentious situation arises, do not hesitate to consult colleagues or a manager if you feel unsure.

Work Environment and Employees

NP3 should be a professional and welcoming workplace, characterised by respect, integrity and tolerance to create a good work environment. One of the most important factors for the company is committed and motivated staff who understand and work towards the company's vision. NP3's organisation is flat and decentralised, which promotes an entrepreneurial and creative culture among staff. Based on clear targets, every employee gets to take on greater responsibility within their area of expertise, which creates commitment and job satisfaction.

The company's core values are built on employees being committed, trustworthy and businesslike in both internal as well as external dealings.

Our core values

- Motivated – We tackle our assignments with commitment and enthusiasm, which creates a modern, professional and leading company
- Trustworthy – We keep our promises and gain trust with an informal and unpretentious culture
- Businesslike – We are businesslike and show courage and flexibility in all situations

Equality and Diversity

At NP3, equality is a matter of course. It contributes to better quality, efficiency, innovation and profitability. The collective skill base and strength of all employees 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 sex, transgender identity or expression, ethnic background, religion or creed, disability, sexual orientation or age. NP3 has zero tolerance for degrading treatment such as discrimination and sexual harassment.

Tenants and Customers

Our tenants are the very reason for our existence. All tenants and customers must be treated equally with respect and understanding in all dealings.

Information about a tenant/customer, 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 customer's circumstances to an unauthorised third party. The duty of confidentiality also applies after the end of work or contractual relations.

Please consider:

- Answer emails and telephone calls within a reasonable time
- Answer in a professional way both verbally and in writing, in a clear, relevant and comprehensible manner
- A complaint from a customer constitutes valuable information, which can help us in our improvement initiatives, future development and our actions. Complaints must be dealt with quickly, with a positive attitude and clearly showing that we listen and accept criticism.

Suppliers and Business Partners

The procurement of products and services must be based on good business principles. The Company sets out environmental requirements when procuring products and services from contractors and suppliers. The choice of supplier or partner must be made after an analysis of market prices, sustainability and expected quality. Basic human rights, work conditions, environmental and ethical requirements must be complied with. Suppliers and other parties under contract must always be able to have confidence in the integrity of our selection process and established guidelines and procedures.

Even if we have awarded a contract to a party, we always assume our responsibility to customers and other stakeholders. We are always accountable to our customers, and we do not put the blame on a subcontractor.

When we negotiate an outsourcing agreement, we therefore assure ourselves that our partners assume any responsibilities as required by law and other regulations. NP3 has zero tolerance for any forms of corruption and financial irregularities, e.g. bribes, unauthorised commission, fraud, embezzlement and money laundering.

What you must not do

- You must not, for private use, contract a supplier/contractor that is used by NP3 before obtaining the CEO's consent for this.
- In connection with any negotiations, it is always prohibited to privately negotiate supplier services that are part of a tender. The prohibition applies from when the negotiations are initiated until 30 days after the procurement has been completed.
- You must not buy or sell services for private purposes under terms that do not constitute normal market conditions from a supplier to NP3.
- You must not, without the CEO's consent, buy or sell services on behalf of NP3 from a supplier/contractor who is a person closely associated to you.
- You must not accept or offer any gift/benefit that appears so attractive that it may be construed as having an inevitable influence on you, i.e. the benefit is intended to invoke feelings of gratefulness or of obligation to return the favour.

What can you offer or accept?

Employees can give, promise or offer a benefit or accept one if:

- done so in full transparency,
- the benefit is of moderate value, and it is not in any way such that it may be construed as having an influence on anyone's behaviour, i.e. affects or risks affecting the recipient's decisions or way of performing their work tasks.
- A benefit or gift that any company employee receives on their own behalf must be reported to their immediate supervisor if the value of the gift exceeds SEK 300.
- When giving a gift or benefit to a customer or partner, which has a value exceeding SEK 300, the immediate supervisor must be informed before the gift/benefit is given.

Events

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 accept invitations that includes persons who are closely related to you. Such persons must always pay the normal market price.

Entertainment

- A prerequisite for accepting any form of entertainment is that it is not regularly offered to the same recipient other than on rare occasions.
- Internal entertainment must always have the consent of the immediate supervisor.

Doubts

- If, as an employee, you consider that a benefit offered may in fact contravene the above rules, you should either refuse it immediately or refer to the CEO for a decision before accepting it.
- 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.

- It can be difficult to decide if a benefit in the form of a gift or an invitation to attend an event can be classified as a bribe or as an acceptable feature of a business relation. Whether a benefit can be construed as improper or not often depends on the circumstances of each particular case. In general, there are no defined amounts for what might be construed as having an undue influence, and therefore an overall assessment must always be made of all the circumstances in each particular case. This means that a benefit may be looked upon differently depending on people's positions or assignments. If you feel unsure, please consult the CEO.

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

A brand name is not a logo or a company name, but the sum total of all the dealings people have with us. Everything that they think and feel about us. As an employee at NP3, you therefore have a major role to play in how our brand name is perceived and developed.

Social media

When using social media, employees at NP3 have the same freedom of expression as any other private individual. But in social media, the line between private and profession life can be blurred. 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. Even if you express yourself in social media as a private individual, you sometimes need to exercise professional responsibility when your views can have an effect on NP3's brand name. In the company, we show integrity and respect, which means that you must not say bad things about competitors, and that you must avoid using irony and sarcasm, as well as making discriminatory judgements.

The media

The media is an important vehicle of communication. 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, reliable, relevant and based on established facts.