



Bravida Code of Conduct

A word from the CEO

Bravida's Code of Conduct is not just a set of rules that we all have to follow. It defines our shared values. Values that bind us together as ONE Bravida.

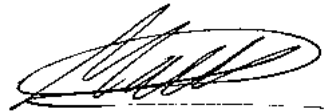
As Bravida is a large company with a local presence in all the Nordic countries, we must act responsibly. We aim to be perceived as credible and responsible at all times. We shall be a good business partner and a market leader in business ethics.

To succeed, all of us who work at Bravida must do the right thing – even when it can seem challenging. Every decision we make during our work day reflects our culture and shows who we really are. Our Code of Conduct shall be infused in all our activities and act as a compass, helping us choose the right path.

It is therefore extremely important that we all familiarise ourselves with our Code of Conduct and think about what it means to us personally and how we should act internally to and with our colleagues, externally with regard to customers, suppliers and partners, and when we represent Bravida in society.

To conclude, if you ever feel unsure about how to act – don't hesitate to ask for advice. We create great results together

October 2024



Mattias Johansson,
CEO and Group President



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

Care for business

We are passionate about our business and are cost-conscious.

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

Take responsibility

We are reliable, and we keep our promises.

We never put safety at risk in the workplace.

We take responsibility for the environment, customer relations, society and 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 for customers.

Be proactive

We actively seek out customers, listen attentively and propose solutions.

We think about the future to generate opportunities and avoid risks.

We aim to constantly develop, and we 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 in more detail the meaning of our four values and shall help to make it clearer and easier to work towards common goals and with a common culture – both in our internal cooperation and in our relationships in the surrounding world. Bravida supports the ten principles of the UN Global Compact. The Code of Conduct is 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 climate.

We shall build our relationships with customers, partners and suppliers in the value chain in accordance with our values and, of course, the laws, rules and regulations that apply in relevant markets and to our business.

We have drawn up a specific code of conduct for suppliers and all suppliers to Bravida must confirm that they accept and comply with its terms.

1.3 Ethical dilemmas

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

1. Is it legal?
2. Is it respectful and in line with our values and the principles of the Code of Conduct?
3. Would I feel comfortable explaining my actions to a colleague, my boss, subordinates or family?
4. Would I be able to defend my actions if they were published 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 making a decision.

Ethical issues can be difficult to assess and don't always have a standard answer. You are therefore always welcome to contact one of Bravida's lawyers for guidance.

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 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 in HR or the Group's Chief Legal Officer.

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.

Read more:

<https://www.bravida.se/en/about-bravida/our-values/whistleblower/>

Under no circumstances does Bravida tolerate reprisals against employees who report a breach of the Code of Conduct in good faith.

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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 support and respect international human rights and ensure that we are not involved in human rights violations.
- We uphold freedom of association and organisation for all Bravida's employees and recognise the right to collective bargaining.
- We do not permit any practices that restrict employees' free movement and no forced labour or child labour of any kind occurs within Bravida.

2.2 Working conditions in terms of gender equality and diversity perspectives

By promoting gender equality and diversity, Bravida makes the most of employees' differences, skills and experience. Bravida shall 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 shall be a workplace at which all employees have equal opportunities for training and skills development. The Bravida School enables further improvement of gender equality and diversity. Bravida shall 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 discrimination

Bravida has zero tolerance of all harassment and discrimination.

All our employees shall be shown respect regardless of gender, transgender identity or expression, ethni-

city, 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 strives to have a positive and safety-aware corporate culture that ensures our employees are satisfied in their work and can come back to work the next day fit and well. We aim to eliminate all physical and mental ill health that is due to work.

All Bravida's employees have a responsibility to create, develop and maintain a good and safe working environment. Achieving this requires joint efforts together with our customers, consultants, suppliers and other parties at our workplaces. This means that Bravida employees:

- Put safety first
- Actively seek out information about what risks exist in the relevant work environment
- Actively seek out information about the workplace's rules and guidelines, and Bravida's governing documents for health and safety, and comply with these at work
- Actively communicate with customers, employees and suppliers about safety issues relating to health and safety
- Engage each other in safety work and encourage everyone to participate in the development of health and safety initiatives
- And work to ensure compliance with health and safety standards throughout the value chain

This also means that employees in a management position:

- Ensure prompt handling of accidents, incidents and risk observations, in accordance with Bravida's incident management procedure
- Regularly participate in Safety Walks with the aim of increasing mutual understanding of risks in our work environment
- Actively communicate safety issues internally among colleagues and work teams



2.5 Leadership

At Bravida, our leaders actively work with our fundamental principles. They should act as role models regarding Bravida's values and Code of Conduct, and ensure that we always have a safe, pleasant and stimulating workplace. Everyone at Bravida, including managers and employees, has a significant responsibility to create a culture that adheres to our Code of Conduct and its associated guidelines.

Our **leadership model** describes our view of leadership and what we expect from our leaders in terms of both leading the business and leading the employees, which are two sides of the same coin.

At the heart of our model is 'A Safe and Inclusive Workplace' which is the foundation of everything we do. We know that a safe working environment at which everyone feels welcome and respected is crucial to our success.

The **Lead the business** area relates to how we run and develop our business. This includes strategic planning, performance monitoring and continuous improvement to ensure we deliver the highest possible quality and value to our customers.

The **Lead the people** area focuses on how we inspire, motivate and develop our employees. By creating a positive and supportive working environment, we help our teams reach their full potential.

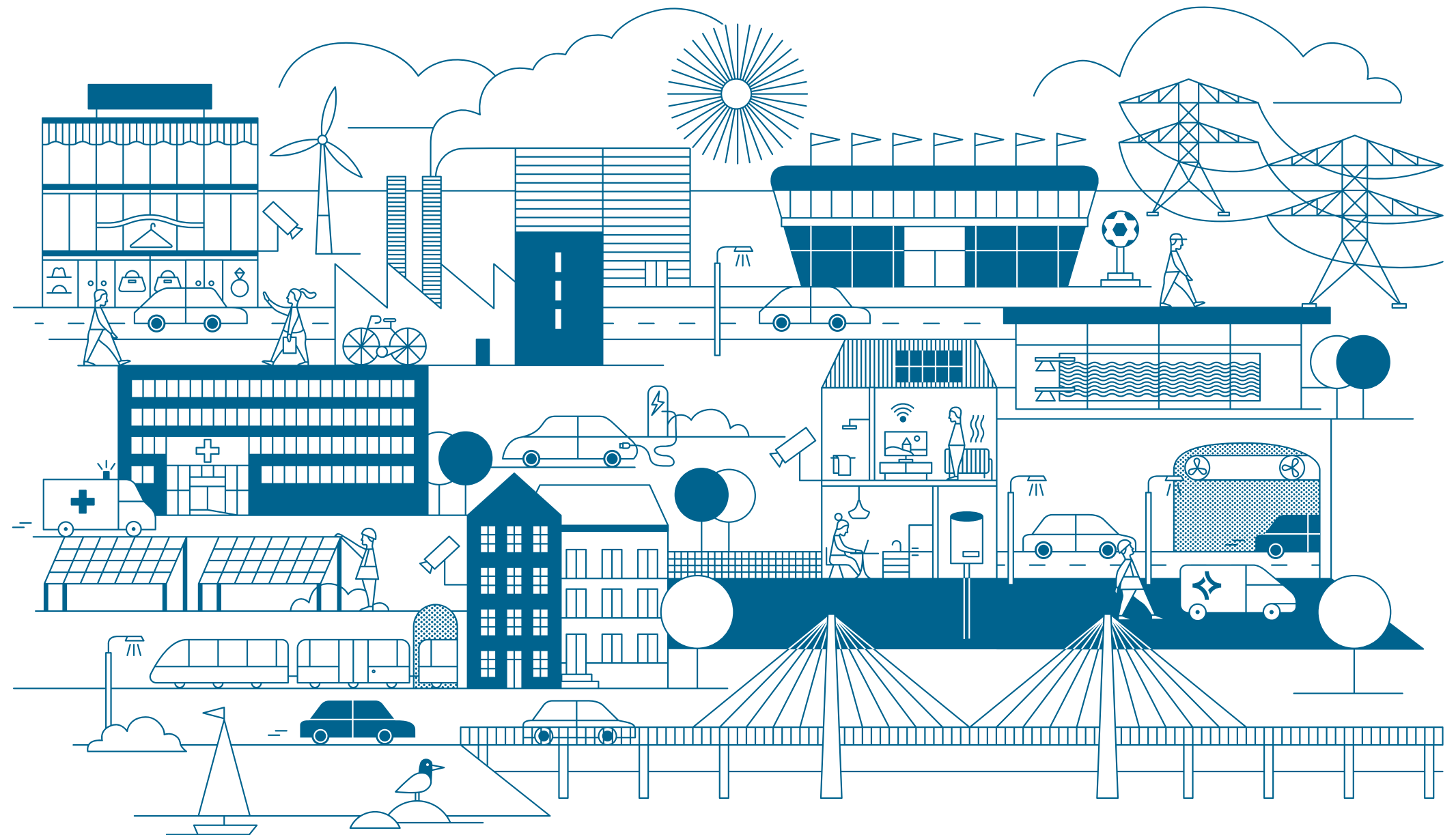
3 Environment and sustainability

– Bravida is helping to build a sustainable society

Bravida helps customers to realise the true value of their buildings and installations. Bravida has a comprehensive consulting, installation and service offering, with a focus on sustainability and energy efficiency. We want our customers to experience the feeling of when what simply must work, works. As a company involved in urban development, we take responsibility for our solutions and how we deliver our work.

This means that:

- We provide our customers with environmentally efficient installation and service solutions that reduce consumption of energy and resources.
- We inform our customers about current and future energy and environmental requirements and suggest how their facilities can be made more energy efficient and which measures should be prioritised.
- We take active measures to reduce our own environmental and climate impact and continually improve our environmental efforts based on clear goals and ongoing monitoring of performance.
- We train and incentivise employees and cooperation partners to plan and carry out their work in a more sustainable way.
- We put demands on suppliers and partners to provide more sustainable materials, products and services.
- We comply with the environmental and climate requirements of society and our customers, 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 the relationships with our business partners. We do this primarily by always delivering what we have promised. We believe in competition and that all decisions, both internally and in relation to our business partners, should be based on professionalism. We must never circumvent or seek improperly to influence our business partners' decision processes.

4.1 Customers and quality

Our interaction with customers shall always reflect our values and be based on trust, responsibility, commitment and competence. We deliver the services we have agreed to provide, at the times and at the price agreed with the customer.

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 particular expertise.

Quality means meeting the demands of customers and society and focusing on constantly improving through development, training and the systematic reintegration of experience. Our services and deliveries shall be characterised by high customer value.

4.2 Competition

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

For example, competitors are not permitted to co-

ordinate their actions toward customers, divide up 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 regarding other contact 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 collaboration with competitors must be approved by Bravida's legal department.

4.3 Anti-corruption

4.3.1 Without personal gain

The giving and receiving of gifts and other benefits or favours to and from customers and suppliers could be regarded as bribery. This also applies to inviting people to events or activities. Bribing someone, i.e. giving somebody something with the intention of improperly influencing that person, is a serious crime that carries 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 demonstrate caution and moderation when we give or receive gifts. This also applies when we extend invitations to or are invited 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. It is not permitted to give gifts or other benefits or favours to such persons.

We shall therefore always:

- Act in a way that results in us and business partners not being dependent on one another.
- Be very restrictive regarding gifts and other benefits or favours, both to and from our business partners, and completely avoid giving gifts or other benefits or favours to persons who directly or indirectly exercise public authority or are involved in making decisions regarding public procurement.
- Avoid business partners to pay for travel and meals for us and not either pay for these for our business partners.

We shall aim to base all our relationships on a professional approach that benefits Bravida and our business partners, and does not involve personal gain for those involved.

4.3.2 Travel, training courses and conferences

We do not organise any travel, training courses or conferences together with our business partners, unless these are clearly linked to Bravida's business operations and have commercial importance.

Participation in travel, training courses or conferences arranged by our business partners shall always be approved in advance according to the manager's manager principle. In the event of deviation from the normal decision-making and authorisation procedures, the manager's manager principle involves an action requiring the approval of a manager's manager. We do not organise training courses or conferences held outside the Nordic region. Any necessary travel outside the Nordic region requires approval in advance in accordance with the manager's manager principle and by the Group's Chief Legal Officer.

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

4.3.3 External hospitality

All hospitality shall be moderate, transparent and have business relevance. We do not accept hospitality that is not directly work related and does not have business value. Business benefit means something that the recipient benefits from professionally. Transparency means that we must ensure that those participating have their employer's approval and that we report the costs and programmes correctly. All hospitality shall always be authorised by a senior staff member who was not present. This means that the person in the most senior position at that time should approve payment.

For further guidance, see Bravida's Guidelines on Gifts and Hospitality.

4.3.4 Political influence

Bravida is neutral towards political parties, political officials and candidates. Employees who engage in dialogue with authorities or other public bodies for the purpose of informing or influencing public decision-making shall do so respectfully and in compliance with local and international laws.

4.3.5 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 that are 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 on a sanctions list.

5 Appropriate internal conduct

5.1 Conflicts of interest

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

5.2 Handling of internal resources

As an employee at Bravida, you are expected to utilise Bravida's resources responsibly. Bravida's authorisation procedures must always be followed.

Internal hospitality shall always be moderate and predominantly of benefit to business. Internal hospitality shall be characterised by transparency and authorised by a senior staff member who was not present. Costs for internal activities must be reasonable.

Our own training courses and conferences that are not arranged by The Bravida School or that are not part of a wider training programme shall always be set out with a detailed programme and approved in advance according to the manager's manager principle. We do not organise training courses or conferences held outside the Nordic region. Any necessary travel outside the Nordic region requires approval in advance in accordance with the manager's manager principle and by the Group's Chief Legal Officer.

5.3 Purchasing

The ordering and supply of items shall always be related to a customer assignment and marked with a work order number. Delivery shall always be made

directly to the customer. If materials are returned (surplus), they shall be sent back to the supplier and the cost credited.

We may not use the company's purchasing terms and discounts for our own gain. Large purchases shall 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. It can also be a criminal offence.

5.4 IT, information security and personal data

Company IT tools shall be handled responsibly and in accordance with currently applicable security regulations. All usage shall aim to support the company's business operations and assignment, and personal use should be kept to a minimum.

We shall be careful with all information we receive about business operations. Confidential information about our business or business partners, including customers and suppliers, must not be disclosed to unauthorised persons. We shall always adhere to our agreed commitments. For example, information about a supplier's terms and conditions must never be disclosed to another supplier. We will take measures if any of our business partners breach these guidelines.

Information shall always be stored, handled and communicated in accordance with Bravida's Information Security and Data Protection Policy.

Read more: Bravida's Information Security and Data Protection Policy

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

Read more: BRA Integrity - Guidelines for Handling Personal Data at Bravida

Confidential information received in the course of work must be respected and treated with care.



6 Documentation, reporting and communication

6.1 Documentation and reporting

Accurate and reliable reporting is a prerequisite for the governance of the company and its compliance with laws, as well as confidence in it. It is therefore important that we maintain accurate records and documentation in all areas of our business, regardless of the type of information being reported or documented.

This means that we:

- Report information about our activities truthfully and in a timely manner.
- Follow Bravida's reporting procedures and use the company's IT systems and processes.
- Ensure that financial information always reflects the underlying transaction.
- Ensure that Bravida's invoicing is consistent with the relevant supporting documents and underlying agreements.
- Follow Bravida's authorisation instructions when entering into business transactions, such as authorisation, tendering and purchasing.
- Accurately record working hours and expenses.

If you notice or suspect that these principles are not being followed, you should speak up. If you notice or suspect serious irregularities, such as fraud, you should immediately report these to the Group's Chief Legal Officer.

If you wish to remain anonymous, you can use Bravida's whistleblowing function:

<https://www.bravida.se/en/about-bravida/our-values/whistleblower/>

6.2 Communication

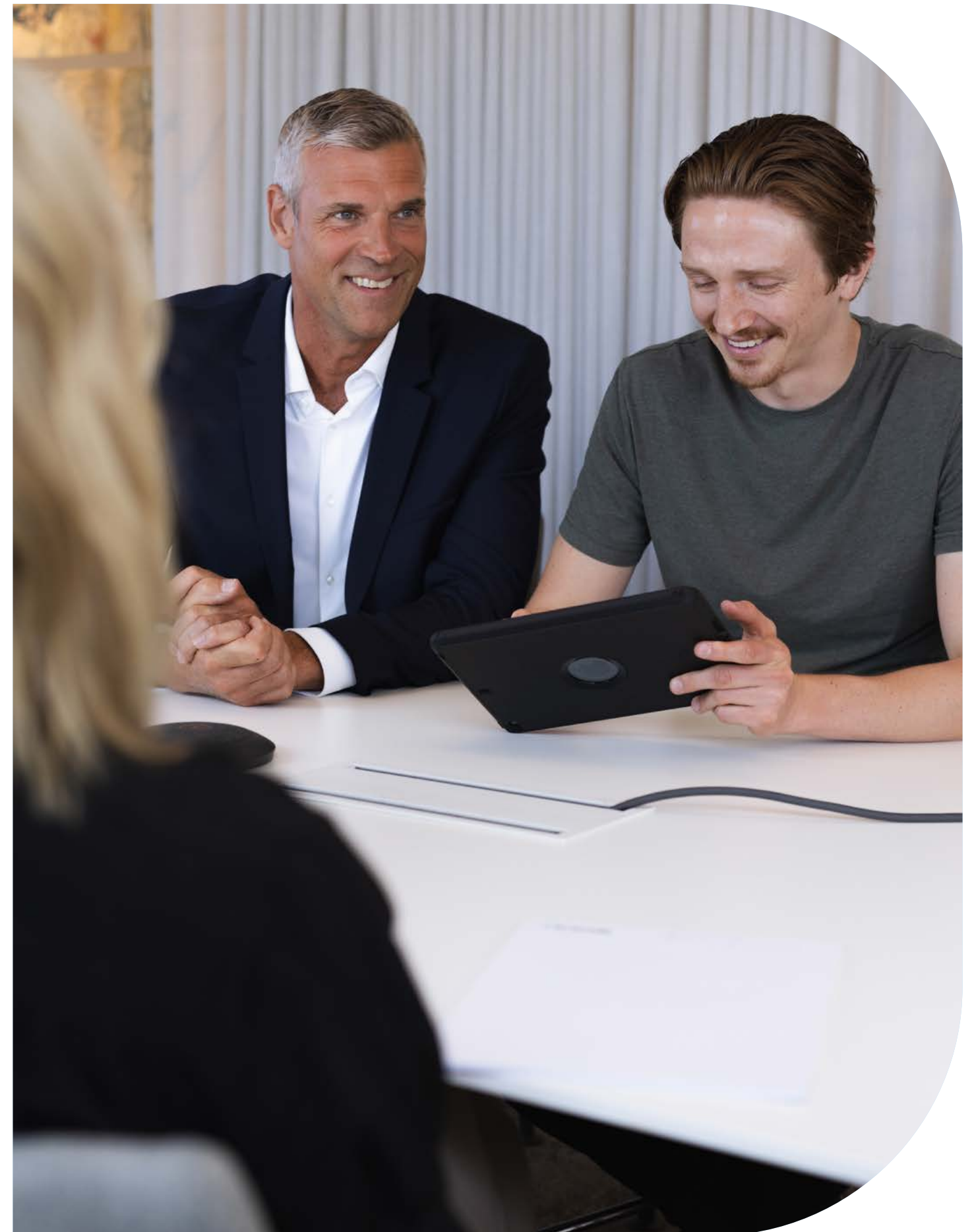
Bravida's internal and external communication supports the achievement of our business goals. Our communication shall build long-term trust and give us a clear identity. All communication from the company shall be timely and reliable.

The company has official representatives for interaction with the media and press, to ensure accurate and consistent communication. All media enquiries shall be referred to these representatives.

Remember that you always represent Bravida during working hours and in communication via the company's channels and platforms. So, think about how you are perceived when you write emails, wear clothes with the company logo or are driving a company vehicle.

Further information:

Contact kommunikation@bravida.se and more information is available to staff on our Intranet.



Our vision is to
always deliver
the experience
of when it just
works.

