



Code of Conduct

LAST REVISED: 2025-05-19

Fabege

1 Starting points

1.1 Background and purpose

Fabege operates in an industry in which a long-term approach is key. Good relationships, a healthy working environment and high business ethics with sound business practices are crucial to our long-term success. All employees, regardless of their position, are expected to behave in a way that inspires trust and respect among colleagues, customers, our owners and other stakeholders in society. A particular responsibility rests with the Board of Directors and the Executive Management Team to facilitate and promote sustainable business practices, in accordance with the guidelines defined in this Code of Conduct.

It is a fundamental obligation for us at Fabege to comply with applicable laws and regulations. In addition to the ten principles of the UN Global Compact, on which this Code of Conduct is based, we also support the UN Declaration on Human Rights and the ILO Core Conventions on Human Rights at Work, as well as other recognised international standards.

We conduct our business based on our SPEAK values, which stand for (Swedish translation in parentheses):

- Speed (Snabbhet) – We are efficient, we prioritise fast decisions, provide prompt feedback and offer simple solutions. We act with clarity, we make things happen and we adhere to deadlines.
- Informal (Prestigelöshet) – The we is more important than the me. We are team players and strive to work together and ensure cohesion in the team. We are not too proud to ask for help and we share our knowledge with others.
- Entrepreneurial (Entreprenörskap) – We identify opportunities and are solution-orientated. We are creative, innovative and inspire new ideas. We are goal-orientated and always want to identify improvements.

“Good relationships, a healthy working environment and high business ethics with sound business practices are crucial to our long-term success.”

STEFAN DAHLBO
CEO

- Business-minded (Affärsmässighet) – We always act professionally, seek win-win solutions and keep our promises. We take a holistic view and identify the best solution for our customers, employees and society in the long term.
- Customer-focused (Kundnärhet) – We create confidence and long-term customer relationships. We are well prepared, act proactively and provide the best possible service based on customer needs. We get to know customers, employees and suppliers through an open, attentive and personal approach.

This Code of Conduct and Fabege’s core values guide us with regard to the laws, regulations and expectations that Fabege and we as its employees, management and Board of Directors must comply with, follow and meet. The Code of Conduct must be reviewed regularly and adopted annually by Fabege’s Board of Directors. In addition to the Code of Conduct, the business is governed by a number of policies and guidelines relating to specific areas.



1.2 Guidance

This Code of Conduct describes how we must act as representatives of Fabege so that confidence in us remains high. However, ethical guidelines cannot fully regulate how every situation in a workplace should be handled. Fabege is therefore dependent on the good judgement of every employee.

Every employee should ask themselves these questions before taking any major decision or action:

- Am I acting in line with the law?
- Could my behaviour be perceived as being unethical and contrary to Fabege's values or interests?
- Could my way of acting affect Fabege's reputation?
- Can I justify my behaviour in the event of media scrutiny?
- Do I need further guidance or advice?

If you are unsure about how you should act in a particular situation, you have a responsibility to ask for guidance. Questions can be directed to your immediate superior, a member of the Executive Management Team or Fabege's Ethics Group.

1.2 Scope

The Code of Conduct applies to all employees, regardless of their position and type of employment. It also applies to consultants. The person responsible for contact with temporary staff is responsible for informing them about the Code of Conduct. The Code of Conduct also applies to members of Fabege's Board of Directors. Fabege expects suppliers to comply with the guidelines in the Code of Conduct, and a special Code of Conduct for suppliers has been created in order to make this clear.

2 Focus areas

2.1 Human rights

We have a fundamental belief in the equal value of all people and we support and respect internationally declared human rights. Fabege must ensure that the company is not complicit in human rights violations. All Fabege employees must have the same opportunities, rights and obligations. Our working climate must be characterised by respect and fairness between individuals and groups.

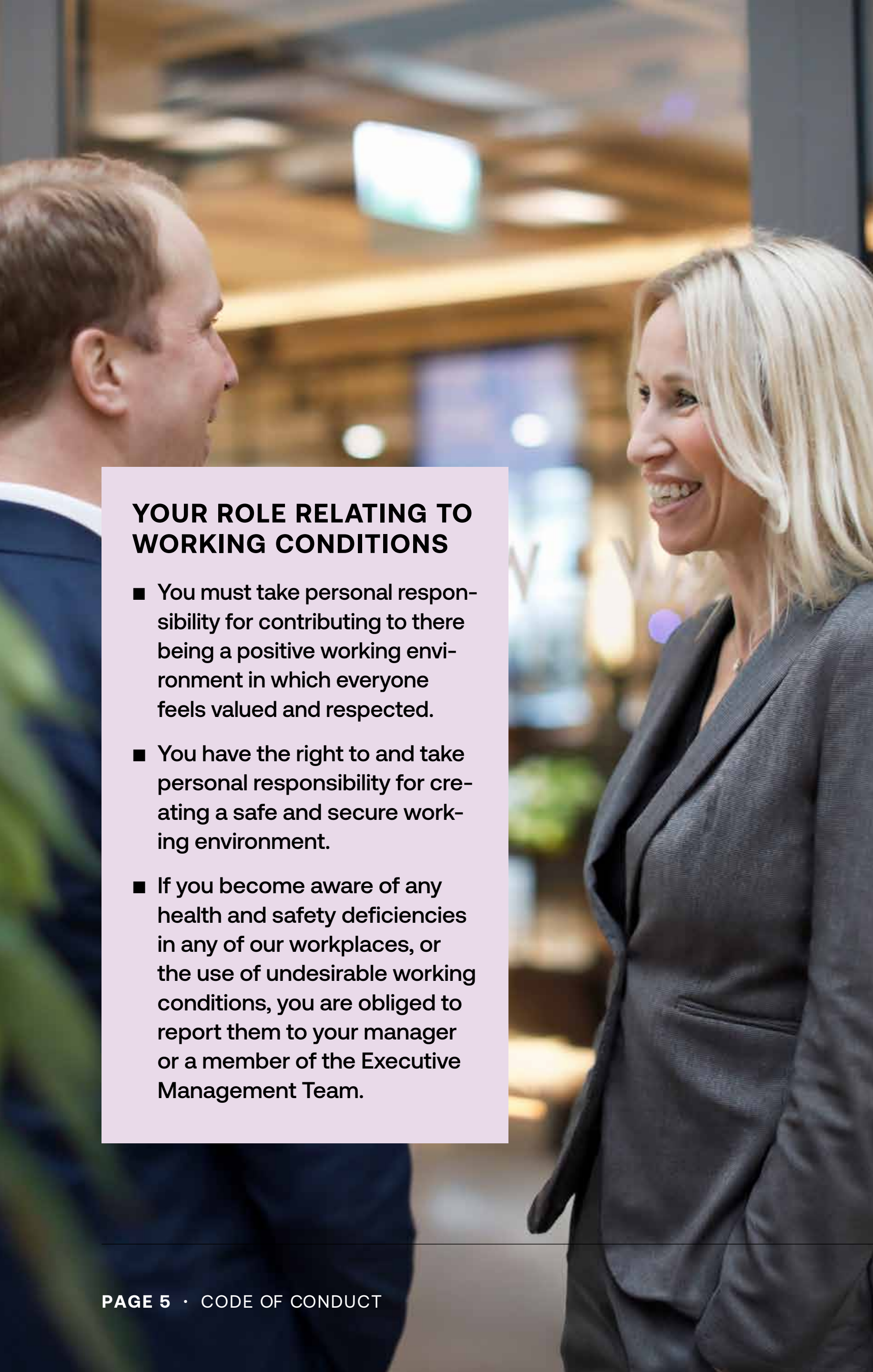
This means that we never tolerate harassment, bullying or other abusive behaviour and we combat all forms of discrimination, whether it is based on gender, ethnicity, religion or belief, sexual orientation, age or disability. Fabege's Equal Treatment Policy provides further guidance on these issues.

Every Fabege employee is an important part of upholding and promoting these principles. We create our work environment together and it is the duty of every employee not to participate in, encourage or refrain from acting against any form of discrimination, harassment, bullying or other abusive behaviour.

YOUR ROLE RELATING TO HUMAN RIGHTS

- You must respect and treat others with dignity and professionalism.
- You must not engage in any form of harassment, bullying or discrimination.
- If you become aware of any human rights violations, discrimination or harassment, you are obliged to report them to your manager or a member of the Executive Management Team.





YOUR ROLE RELATING TO WORKING CONDITIONS

- You must take personal responsibility for contributing to there being a positive working environment in which everyone feels valued and respected.
- You have the right to and take personal responsibility for creating a safe and secure working environment.
- If you become aware of any health and safety deficiencies in any of our workplaces, or the use of undesirable working conditions, you are obliged to report them to your manager or a member of the Executive Management Team.

2.2 Working conditions

Our employees must be provided with a safe and healthy working environment from a physical, psychological and social point of view. We work actively with activities that promote good health and ensure a safe working environment for our employees. All injuries and incidents must be reported without delay so that risks of ill health and accidents can be prevented in the future. All employees must be given relevant training and use appropriate protective equipment to ensure they carry out their work in a safe way.

However, a good work environment is not only safe and secure – it must also give rise to personal development, creativity

and job satisfaction. We aim to attract, develop and retain talented employees. To ensure that employees enjoy their work and achieve good results, the Group needs to have competent managers and offer continuous training and development opportunities. All employ-

ees must have access to information about the company’s overall objectives and strategies, and how their own work contributes to meeting the company’s overall goals.

We recognise and respect collective agreements and employees’ rights to freedom of association and collective bargaining. We take a zero tolerance approach to any form of forced labour or exploitation of children or other vulnerable groups in the labour market. Employees must have reached the age of completion of compulsory national education and at least the age of 16 to be employed.

Fabege’s Work Environment Policy contains further guidelines on these issues.

2.3 Environmental sustainability

Fabege must contribute to sustainable development in society and we want to be perceived as being credible regarding sustainability issues.

Via our activities as a property owner and developer of sustainable neighbourhoods, we have the opportunity to work with and influence many aspects of sustainability, such as energy use, choice of materials, reuse, waste management, transport and the working environment for customers, employees and suppliers.

Sustainability is one of our key focus areas and underpins all our activities. We must work systematically and in a preventative way regarding issues relating to the environmental impact of our business. An ongoing programme of environmental improvement measures must be conducted. The precautionary principle must be applied in order to reduce emissions into the air, ground and water and to minimise consumption of resources.

Fabege's Sustainability and Environmental Policy contains further guidelines on issues relating to the environment.

YOUR ROLE RELATING TO ENVIRONMENTAL SUSTAINABILITY

- You must be familiar with the content of our Environmental Policy and apply the precautionary principle when taking decisions relating to your daily work.
- You must be open to using new environmentally-friendly technologies and strive to reduce the environmental impact of our business activities.





2.4 Business ethics and anti-corruption

Good business ethics that promote fair competition and avoid all forms of corruption are the foundation of all our relationships with customers, municipalities, suppliers and other partners. We strive to act with credibility, honesty and transparency.

Hospitality, gifts and bribes

Fabege must comply with laws and codes relating to bribery, gifts and hospitality. We strongly condemn all forms of corruption. No employees are permitted to offer or receive bribes, or participate in any form of corrupt business practices. Employees must avoid risks of breaching anti-bribery legislation and risks of exerting undue influence, by not accepting or giving personal gifts or other benefits and not engaging in activities that may influence or be perceived as influencing the objectivity of a business situation. Gifts we receive with anything other than symbolic value must always go to the company, to be raffled among employees. Hos-

pitality, gifts and customer events must be characterised by moderation and have a clear business link. Special restrictions apply in relation to persons in the public sector. We must always behave in a way that cannot be misinterpreted as being, for example, an attempt to make a bribe; this is particularly important in interactions with public officials. We must always offer customers the opportunity to pay for customer events and we must respect the fact that customers and public officials sometimes choose not to attend lunches or other activities. Fabege’s anti-corruption guidelines provide more detailed guidance in this regard.

Loyalty and conflicts of interest

It is important that we, as representatives of Fabege, never act in such a way that our loyalty to Fabege can be questioned. When making business decisions, Fabege’s interests must be prioritised. Procurement of products and external services must be based on commercial principles, in accordance with Fabege’s Procurement and Purchasing Policy. Fabege employees must avoid situations in which their personal or financial interests

may conflict or be seen to conflict with the interests of Fabège. For example, employees must not participate in business transactions where conflicts of interest may arise with regard to their own finances or those of their close relatives. It is the responsibility of each employee to report situations that may involve a conflict of interest to their manager without prompting. Before employees take up employment with another employer in parallel with Fabège or undertake other such secondary employment, their immediate superior must be informed of this. Prerequisites for holding parallel employment or other secondary employment are that it does not impede the employee's work, compete with Fabège's business activities or otherwise negatively impact Fabège's business.

Employees may not use Fabège's suppliers or contractors for private use without first obtaining the approval of their immediate superior. In cases of uncertainty, contact the Purchasing Manager. If a decision-making position regarding a supplier or contractor is held, it is not permitted to assign private tasks to them. Employees may not accept discounts or especially favourable purchase conditions specifically addressed

to employees. The approval of the immediate superior is also required if an employee utilises, on Fabège's behalf, a supplier or contractor that has personal or family ties with the employee. This is to ensure that there is no risk of conflict of interest, bribery or the employee taking advantage of their position in the company in any way. Personal relationships or interests must never influence our business decisions.

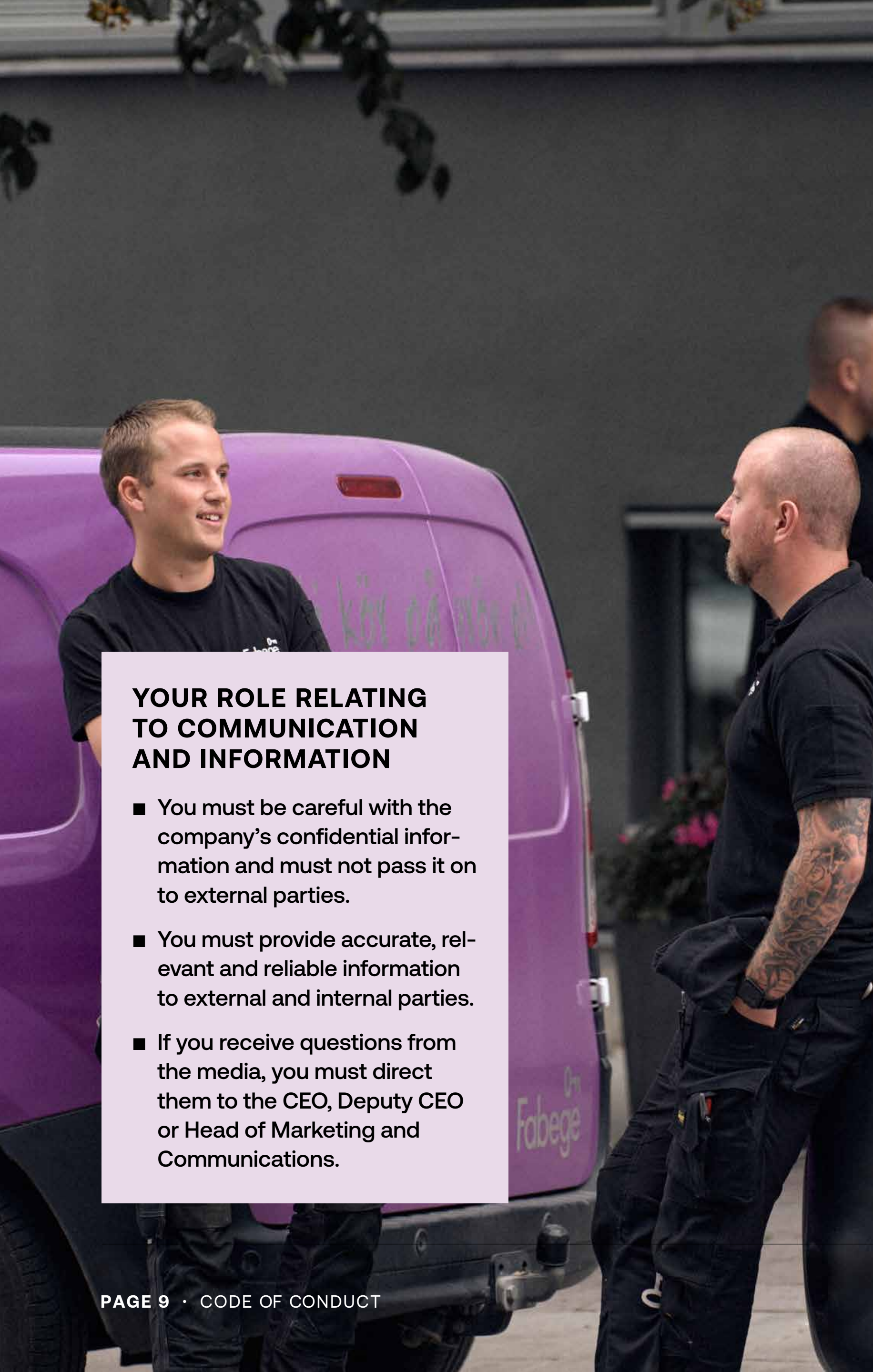
Politics and civic engagement

Fabège does not take any political position and does not support any political party or political organisation. However, we may express opinions, based on what we consider to be in our best interests and those of our customers, which could be interpreted as being political.

Fabège has a strong commitment to Stockholm and collaborates with local partners such as the municipality, universities, colleges and various companies to contribute to the region's long-term development. Fabège also supports various organisations and initiatives that help develop the local business environment and society. All sponsorship must be transparent and be carried out in the best interests of the region.

YOUR ROLE RELATING TO BUSINESS ETHICS AND ANTI-CORRUPTION

- You are not permitted to offer or receive bribes, or participate in any form of corrupt business practices. You must be vigilant with regard to activities that may affect or be perceived to affect your objectivity in a business situation.
- If your personal or financial interests conflict with the interests of the company, you must report this to your manager.
- You must inform your manager before taking up a parallel job or other secondary employment.
- If you suspect or have knowledge of business misconduct, you are obliged to report this to your manager, a member of the Executive Management Team or via our whistleblowing function.



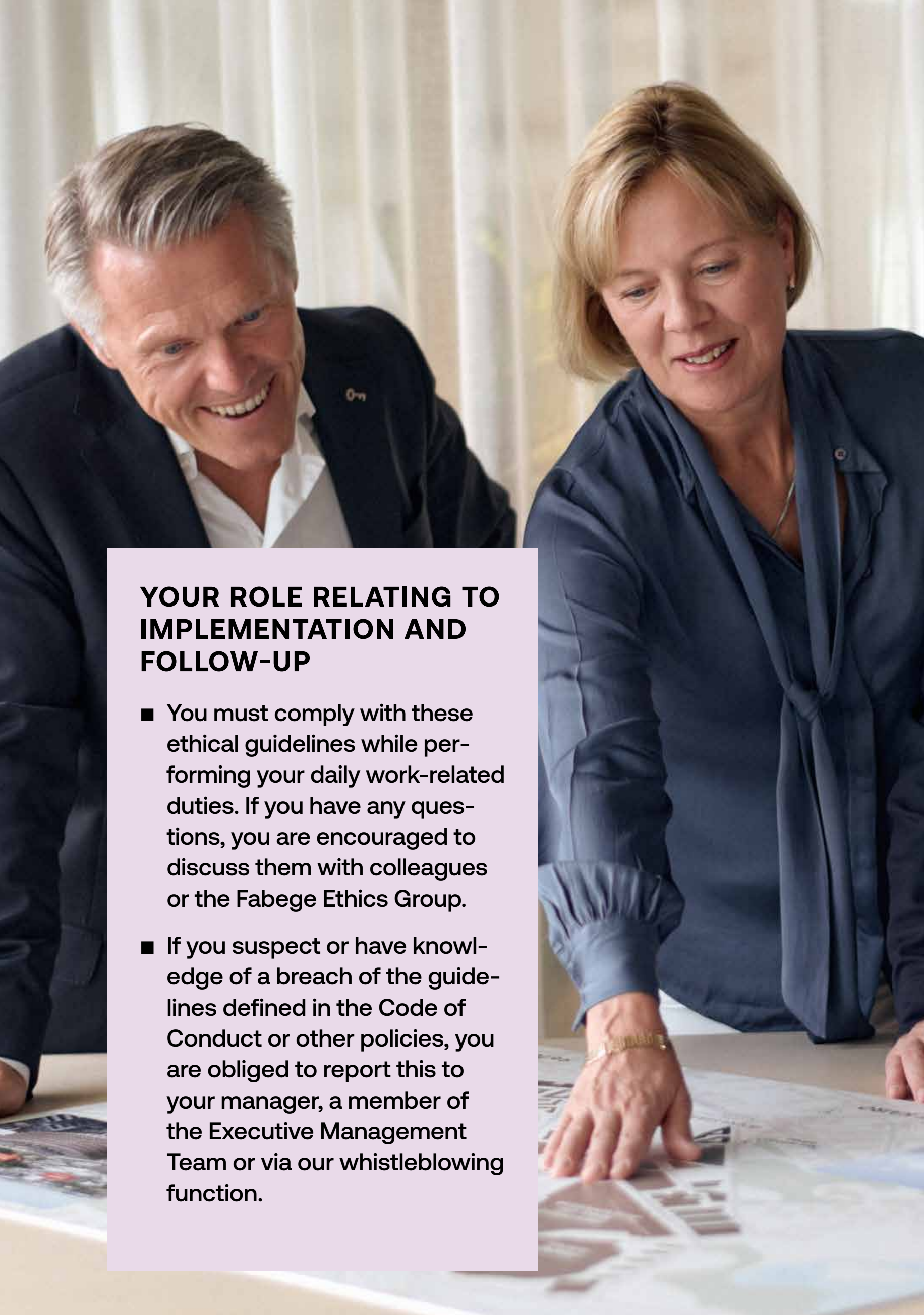
**YOUR ROLE RELATING
TO COMMUNICATION
AND INFORMATION**

- You must be careful with the company's confidential information and must not pass it on to external parties.
- You must provide accurate, relevant and reliable information to external and internal parties.
- If you receive questions from the media, you must direct them to the CEO, Deputy CEO or Head of Marketing and Communications.

2.5 Communication and information

Fabege strives to have an open, transparent and constructive dialogue with shareholders, investors, customers, employees and other stakeholders. It is our responsibility to provide accurate and readily available information to our shareholders and other stakeholders. All communication must aim to build trust and long-lasting relationships, and prevent speculation and rumour. As a public limited company listed on Nasdaq Stockholm, we comply with Nasdaq's rules for issuers and the Swedish Code of Corporate Governance, as well as the laws and regulations that exist regarding market abuse and insider information. Employees must not carry out transactions that involve the use of insider information. Fabege's Insider Policy contains guidelines regarding insider issues. If you are unsure whether you have information that is defined as insider information, contact your manager immediately.

Fabege has internal information relating to business decisions and strategies that could harm the company if the information were to be disclosed to unauthorised persons outside the company. Employees who are aware of such information or otherwise have access to it must not pass it on to persons outside the company. Confidential information about Fabege's tenants and suppliers may also not be disclosed to unauthorised persons. If you are unsure whether information is confidential, you should assume the information is confidential until you receive confirmation otherwise. External consultants who are expected to come into contact with confidential information must sign a confidentiality agreement. Personal data relating to employees, tenants or other parties must be handled with care, in accordance with applicable legislation.



YOUR ROLE RELATING TO IMPLEMENTATION AND FOLLOW-UP

- You must comply with these ethical guidelines while performing your daily work-related duties. If you have any questions, you are encouraged to discuss them with colleagues or the Fabege Ethics Group.
- If you suspect or have knowledge of a breach of the guidelines defined in the Code of Conduct or other policies, you are obliged to report this to your manager, a member of the Executive Management Team or via our whistleblowing function.

3 Implementation and follow-up

Fabège's CEO is responsible for ensuring that employees are informed about the guidelines in the Code of Conduct and that internal training is held regularly to increase employees' awareness of the ethical guidelines. Every employee is responsible for following the guidelines defined in this Code of Conduct. As an employee, you have a personal responsibility for your actions. Fabège encourages a culture in which ethical issues are discussed openly. Fabège's Ethics Group, which consists of representatives from various parts of the organisation, is also responsible for continuously discussing ethical issues in order to develop our practices regarding these matters. All employees can contact the Ethics Group if they have any questions about how the guidelines in the Code of Conduct are to be applied.

In the event of a suspected breach of the Code of Conduct or other policies, it is the responsibility of each

employee to report this, either to their immediate superior or to a member of the Executive Management Team, with this person then also being responsible for following up the incident. Employees and the general public can also report any irregularities that violate the Code of Conduct via Fabège's whistleblower function. This involves the right to remain anonymous and both the initial reporting and any subsequent dialogue are encrypted and password protected. More information on how to do this is available in Fabège's Whistleblowing Policy.

Actions that violate the Code of Conduct are not accepted and may result in disciplinary action, which may ultimately include dismissal and prosecution.



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