

Code of Conduct



Swedavia
Airports

Contents

- Contents 2
- Introduction..... 3
- Swedavia’s Code of Conduct..... 5
- Business ethics at Swedavia 6
- Anti-corruption 8
- Human rights 11
- Social relations and employees 12
- About the workplace environment in particular 14
- Environment 17
- Application and follow-up..... 19

Introduction

Our shared core values are *reliable, engaged, innovative* and *welcoming*. This Code of Conduct constitutes Swedavia's ethical guidelines, which supplement and develop our values and ethical approach. It has a clear starting point in our purpose – Together we enable people to meet – and clarifies how we should work together to meet the demands on our operations with an approach we are proud of.



Swedavia's Code of Conduct

Swedavia is a State-owned company that owns, operates and develops airports across Sweden. International guidelines, the United Nations 2030 Agenda for Sustainable Development, its global goals for sustainable development, and the Swedish State's Ownership Policy guide our operations. We support and run our operations in accordance with the ten principles for responsible business in the UN Global Compact and with the UN Convention on the Rights of the Child. The UN Global Compact is based on the UN Declaration of Human Rights, the International Labour Organization's Convention on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the UN Convention against Corruption.

Our shared core values are *reliable, engaged, innovative* and *welcoming*.

At Swedavia, we are concerned about how we behave towards one another and also how we conduct ourselves in business contexts with customers, suppliers and other stakeholders. This also applies to our behaviour towards those around us. Swedavia works actively with ethical and social issues that we believe constitute the foundation of a modern, sustainable company.

It is a matter of course that we comply with laws, regulations, international conventions, contracts and agreements that concern our operations.

At Swedavia, ethical conduct entails more than avoiding legal violations.

At Swedavia, we are concerned about how we behave towards one another and also how we conduct ourselves in business contexts with customers, suppliers and other stakeholders. This also applies to others in the world around us. Swedavia works actively with ethical and social issues that we believe support the foundation of a modern, sustainable company.

This Code of Conduct constitutes Swedavia's ethical guidelines, which supplement and develop our values and ethical approach. It has a clear starting point in our purpose – *Together we enable people to meet* – and clarifies how we should work together to meet the demands on our operations with an approach we are proud of.

To summarise, I see all of this as an obviously essential requirement in order to enhance our brand so that we are a company in society that people view positively and that we as employees are proud of.

Stockholm, April 25, 2022

Jonas Abrahamsson,
President and CEO, Swedavia

The Code of Conduct applies to all employees regardless of their position, and it is the responsibility of every leader to make these guidelines known and ensure that they are followed. Every employee at Swedavia always bears individual responsibility for being familiar with and following our Code of Conduct. The Code of Conduct also applies to all of our suppliers, and we likewise work to ensure that our customers and partners are familiar with and comply with Swedavia's Code of Conduct.

Business ethics at Swedavia

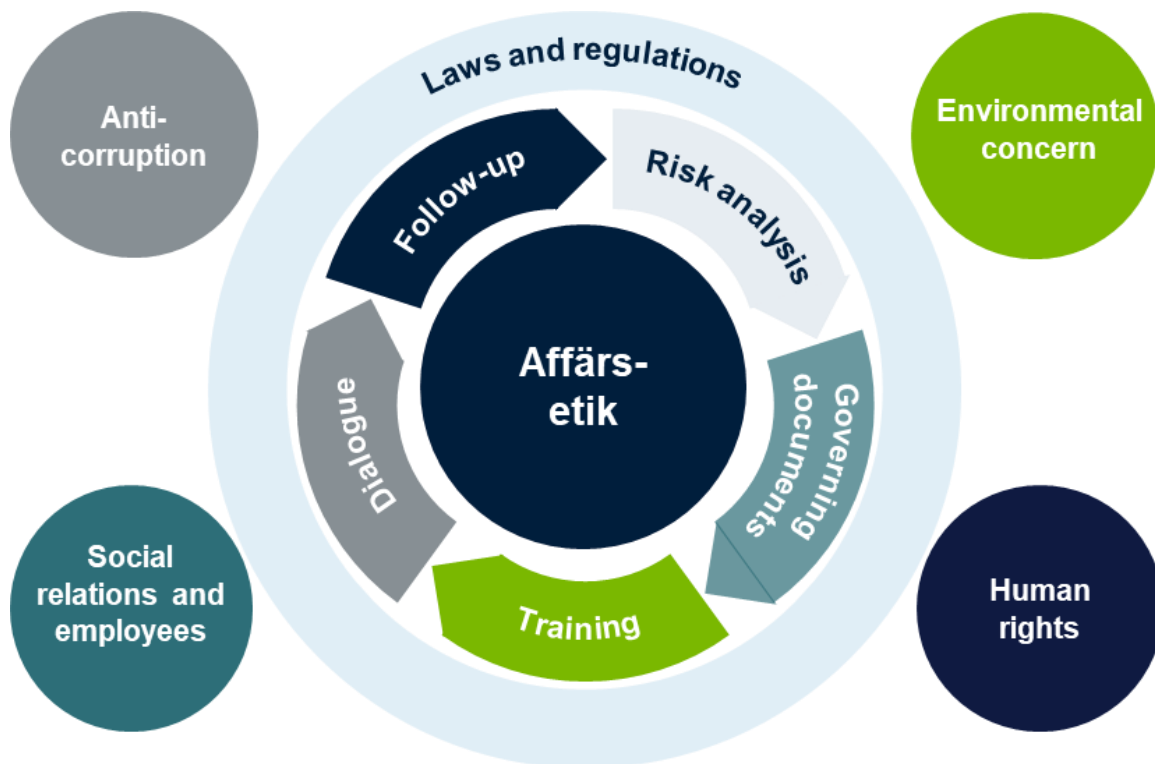
The framework for Swedavia's business ethics consists, as a matter of course, of the laws and regulations that the company must comply with – but it is also important to us that we set higher demands than are legally required. Our business ethics constitute our internal moral compass.

The core principle for us is to work together and always maintain good business ethics. In Swedavia's Annual and Sustainability Report, there are four areas which together comprise what is known as our Sustainability Report. At Swedavia, we have decided that good business ethics consist of our maintaining proper conduct in the four areas outlined in our sustainability report: Anti-Corruption, Human Rights, Social Relations and Employees, and Environment.

So it is especially important for us at Swedavia to work with these areas in order to be a modern, reliable and sustainable company. We take it for granted that our suppliers, partners and customers will embrace and work with these issues.

There is continuous monitoring of how we work in these areas, with the results also reported in our Annual and Sustainability Report.

For each of these four areas, we work according to the process shown in the picture below. We carry out a comprehensive risk analysis together with the Risk Manager at Swedavia and also prepare measures to mitigate risks. We make sure that we have clear governing documents that are reviewed and updated each year. We conduct training for employees at Swedavia and work with advice, make sure we maintain an active dialogue within the company and create opportunities for follow-up.



Our goal is for all employees at Swedavia to be trained in the four areas and be part of our dialogue on these issues. So it is also important that we highlight each of the four areas in our Code of Conduct.

Anti-corruption

Swedavia's business decisions in every case are based on objective grounds and criteria. We always comply with the safety, security and environmental requirements set. We respect and comply with laws, agreements and other statutes that provide the framework for our operations. All business transactions are made based on professionalism, sound ethical principles and a high level of integrity, and we also expect this of our business partners.

We are well aware that things which are not prohibited can still be inappropriate. So it is important that we maintain a good dialogue within the company. If there are any doubts, you can always ask for advice from your immediate supervisor, but you are ultimately responsible.

Our Code of Conduct is one of the governing documents in our work with anti-corruption. Swedavia has also adopted a special Anti-Corruption Policy as well as Guidelines for External Business Entertainment, which are governing documents that everyone at Swedavia must comply with. The Guidelines include detailed instructions for how we should conduct ourselves with external contacts as Swedavia employees. The Anti-Corruption Policy also specifies that Swedavia's employees must comply with the Swedish Anti-Corruption Institute's Code on Gifts, Rewards and Other Benefits (the Code of Business Conduct). Swedavia also supports the Swedish Joint Initiative to Prevent Bribery and Corruption between suppliers and clients in the publicly funded Swedish construction and real estate sector. For employees at Swedavia who work with the construction and real estate sector, this provides additional practical help to do the right thing with examples and ethical guidelines. All of these documents are available on Swedavia's intranet.

Corruption and inappropriate influence

Swedavia vigorously opposes all kinds of corruption. You may never offer or receive benefits or rewards that could be interpreted in any way as business or personal benefits for you or others.

Swedavia also opposes any kind of attempt to exert an inappropriate influence on our employees. No employee may accept any kind of remuneration that can be seen as corruption, the giving or the taking of bribes. We also refrain from acts that can be seen as attempts to exert inappropriate influence on the recipient's decision.

Gifts and business entertainment

Any business entertainment is carried out in accordance with established business practice and the laws that apply in the markets we work in. We always carefully consider and are very restrictive about offering or receiving gifts and/or benefits or allowing ourselves to accept business entertainment. Ask your immediate supervisor for advice when you are uncertain and get support from the guidelines mentioned above. However, you bear individual responsibility for the decision you make.

Private interests, conflicts of interest and agreements with related parties

Swedavia's employees may not take advantage of business opportunities, either for themselves or for the benefit of people close to them, that actually belong to Swedavia. It is also self-evident that employees do not use information, property or their position at work for personal gain. People who are involved, directly or indirectly, in contacts with tenderers, suppliers or customers may not have private business or transactions with them.

Every employee must refrain from situations in which personal interests could be in conflict with Swedavia's best interests.

Side-line activities, other assignments or involvement in external operations

Engagement through various side-line activities is considered to be something positive. However, this must not affect work adversely or conflict with Swedavia's business interests. As an employee at Swedavia, obviously you may not have another job or carry out other work when you work at Swedavia without getting written approval in advance from your immediate supervisor. The same holds for Board duties and the giving of advice to – or through the ownership of – customers, suppliers, partners or competing operations.

Whistleblower function

Swedavia has a whistleblower function that gives all employees at Swedavia¹ the opportunity to use reporting channels to report irregularities in a work-related context where it is in the public interest that the matter comes to light. Examples of what is in the public interest are irregularities in areas of importance to society in general. Customers, suppliers and other stakeholders that are connected to Swedavia also have the same opportunity to report. The whistleblower function complies with laws and is also approved by Swedavia's Board of

¹ but also self-employed people, volunteers, interns and people who are part of Swedavia's administrative, management or regulatory bodies.



Human rights

Running airports is a complicated operation that can potentially affect the human rights of many different stakeholders. Swedavia respects all internationally recognised human rights and works actively to comply with the UN Guiding Principles for Business and Human Rights. We support the principle of not causing, contributing to or being associated through Swedavia's operations with adverse human rights impacts.

Swedavia's fundamental assumption is that all people are of equal value. We respect the personal dignity, integrity and rights of all people. All people receive equal treatment and equal opportunities, regardless of their age, gender, transgender identity or expression, ethnic identity, religion or other belief, functional impairment, sexual preference, political conviction or social status. All of Swedavia's employees are free to join any association or organisation.

Swedavia works for sustainable development and sees how employees from a variety of backgrounds provide operations/the Group with human resources and business benefits. Our objective is to achieve gender equality and have at least the same percentage of employees with a foreign background as that reflected in Sweden's demographics. We are convinced that diversity, gender equality and an inclusive culture contribute to increased creativity and our ability to develop and thus to the company's competitiveness and attractiveness.

Our relation to one another is characterised by mutual respect and a shared sense of humanity. Each and every one of us should expect to be respected for who we are. No form of discrimination, harassment or retaliation is allowed, and everyone should feel welcome at Swedavia.

As a company that takes responsibility, Swedavia carries out continuous work to proactively identify and manage risks associated with human rights throughout the value chain. As part of our work to ensure social responsibility in our value chain, we require that our suppliers work actively with their suppliers and sub-suppliers to ensure that these operations respect and support internationally recognised human rights and take measures to avoid causing, contributing to or being associated with adverse human rights impacts.

Social relations and employees

Our employees are Swedavia's most valuable asset. It is through our employees' engagement, reliability, motivation and competence that we create the atmosphere in which employees and customers feel good and operations are developed, and that we can make a difference.

Every employee is an ambassador. We act in accordance with our values, so that trust in Swedavia is also strengthened outside business hours. We are especially aware of this when we represent Swedavia in different forums and contexts and wear clothes or travel in vehicles that feature Swedavia's logo. This likewise applies when we act in digital environments, for instance, when we take part in social media and discussion forums, write e-mails, visit websites or interact with others online.

Confidentiality

All employees at Swedavia familiarize themselves with the content of Swedavia's confidentiality policy in conjunction with the signing of their employment agreement. We never comment on or provide data that can provide outsiders with access to sensitive information. We are cautious when we discuss internal business or anything else that concerns Swedavia to reduce the risk that information will reach unauthorized individuals by mistake. This confidentiality also remains in effect once a person's employment has ended or their contract with Swedavia has expired.

Physical assets

Swedavia has a large number of workplace facilities in our operations. Our goal is to give every employee the tools they need, in the form of equipment and information, which are required in their daily work. We prevent unnecessary wear and tear, damage and other losses. Equipment and other assets may not be used for private purposes or for personal gain.

Intangible assets

Intangible assets are important for Swedavia's operations and results. These can include, for example, specialist know-how, methods, concepts and ideas that we have developed and use in carrying out our professional duties. We also protect and manage these assets in Swedavia's interest. We likewise respect the intangible assets of others and shall not infringe such rights.

Unless otherwise specified by law or in decisions by government authorities, we shall not make company secrets or other important information concerning Swedavia available to unauthorized persons before we have had a confidentiality agreement signed by each such individual. Intangible assets can quickly be spread and made available online through indiscreet formulations, for instance via social media. So we contemplate and think about how we express ourselves in these contexts.

IT assets

Swedavia's employees have access to IT equipment via e-mail, the internet and different applications in order to have access to the information and services needed in their work. We comply with security regulations in effect and are personally responsible for this IT equipment and its use. We do not lend our identity and never give our password to anyone. Nor do we use Swedavia's IT equipment and IT services to damage Swedavia or a third party.

Information

All information that is of importance, for instance, to Swedavia's Board of Directors or for decisions, trust in the company, goodwill, sustainability, profitability or production is operational information. We handle operational information with great care. We all take part in the work to ensure that this information is accessible and accurate and that the right levels of authorization govern the protection of this information. We report all suspicions of a breach, unlawful treatment or other incidents in which Swedavia's information is managed.

Protection for personal integrity in the handling of personal data

Swedavia protects the integrity of our customers, partners and employees, and we are committed to complying with the regulations on data protection in effect. The General Data Protection Regulation (GDPR) entails enhanced protection for people whose personal data are handled and sets requirements for companies and individuals that handle such personal data. GDPR stipulates, among other things, that "the protection of natural persons when processing personal data is a basic right".

In order for Swedavia to comply with GDPR, all employees must be familiar with the regulation and comply with the internal regulations established. All employees at Swedavia thus undergo training on this law, and there is information on the company's intranet and good opportunities for internal advice and dialogue on these issues.

About the workplace environment in particular

Occupational health and safety is a high priority in all operations that Swedavia carries out. Concern about safety applies to all kinds of workplace environments, whether organisational, social or physical – no one in Swedavia's operations should put their health or safety at risk at their place of work. Everyone must know about or have the opportunity to obtain information about legal requirements and other regulations and processes that concern their own tasks. All employees and other stakeholders in our operations are responsible for taking part and contributing in the work to create a safe workplace environment for themselves and for everyone. This responsibility includes reporting risky situations that entailed, or risk entailing, injury or ill health. By having everyone take part in and report shortcomings, we safeguard our work with preventive measures.

Risks and protective measures

Everyone should have information about the risks involved in their work and how the work is to be carried out safely. Maintenance and checks help ensure that the risk of injury and ill health are minimised. Together we strive for continuous improvement in the workplace environment to prevent any kind of injury or illness.

Victimisation, discrimination and retaliation

No form of victimisation, discrimination or retaliation is allowed in Swedavia's workplaces. Swedavia works systematically using a preventive approach on these issues by carrying out continuous work on mapping, analysis, remedies and monitoring.

Drugs and alcohol

The consumption of alcohol or drugs at work or consumption that risks affecting work is not allowed in any operations and is incompatible with Swedavia's operations. To ensure a safe workplace environment, it is a matter of course that people are sober at work and refrain from all non-medical use of narcotic substances, anabolic steroids or mind-altering substances.

All employees and consultants take a drug test when they are first hired, and random drug tests are carried out in all operations.

Social media

Our engagement in social media spreads our message and enhances our brand. It also enhances the image of our company as open and accessible. As an employee, you are always an individual. However, your participation in social media affects not just your image but Swedavia's image. It is very important that you distinguish between when you participate in social media within the scope of your job and when you take part as a private individual. You are always personally responsible for whatever you publish on your own initiative regardless of whether it is published in your capacity as an employee or privately. You can never open or operate an account in social media in Swedavia's name without authorisation. Information that is detrimental to Swedavia can constitute a violation of the employee's oath of loyalty in their employment agreement.

If you are uncertain about what you are entitled to do and what is allowed within the scope of your job, for instance, posting items that concern Swedavia, you should ask your immediate supervisor and also get support from Swedavia's guidelines concerning social media.





Environment

At Swedavia, we work actively to create a culture based on interest and engagement in how each and every one of us can help reduce our impact on the environment. Environmental concern is integral to our operations and is taken into consideration in all decisions. We obtain the knowledge needed in order to carry out our tasks in a way that reduces our environmental impact since we know that the environmental impact of aviation is of great importance to aviation's development.

At Swedavia, we strive to reduce the negative environmental impact of our airports and help in our work in order to achieve the environmental quality goal of "limited climate impact". We are aware of how we affect the environment, and this knowledge means that we can work in a preventive manner to avoid any unnecessary impact on the environment and unnecessary risks to the environment. We have systematic checks on how our operations affect the environment, and we carry out the necessary surveys to see how we affect our surroundings. We also work so that other companies and organisations at our airports reduce their environmental impact. All businesses operating within the boundaries of our airports will be fossil-free by 2025, and transport to and from the airports will be fossil-free by 2030. In that way, Swedavia can enable the energy transition of the transport sector in the regions we operate in.

Our objective is to reduce greenhouse gas emissions in line with the Paris Agreement's goal to limit global warming to 1.5 C° and increase the share of sustainable aviation fuel used. At the end of 2020, we achieved our goal of zero tonnes of emissions of fossil carbon dioxide from our own airport operations. We are now taking the next step and aim to make our airports completely fossil-free. That means we need to further involve and strengthen our collaboration with our suppliers and partners in order to collectively reduce emissions of greenhouse gases.

We work to achieve resource-efficient operations, reduce energy use and reduce atmospheric emissions and discharges to land and waterways. We run operations at our airports in a way that benefits biological diversity, work actively to reduce noise load and work to ensure that the exposure experienced is considered acceptable relative to the social benefits of aviation. We ensure that we handle chemicals in a responsible manner and strive to replace chemicals that are hazardous to people's health and the environment with less toxic substances. We minimise the generation of waste in a number of ways – first, by preventing the production of waste; second, by recycling products; and third, by recycling materials and the energy they contain. In the construction of new properties and the renovation of existing ones, we strive to make them energy-efficient and make sure that the materials and solutions chosen are sustainable.

We are improving our knowledge about the climate impact of large construction and civil engineering projects in order to ensure that future infrastructure will be climate-smart. Swedavia's construction operations will also be fossil-free by 2035.

One important contribution to sustainable development is that we set environmental requirements in the tender process for services and products. Through close collaboration with our suppliers, we can contribute to a better environment. Suppliers are expected to have a good understanding of the life cycle perspective and what the environmental impact of their own operations is.



↑ Polis
Police

↑ P Parkering P59
Parking P59

→ Charterbuss
Chartered coaches

→ P Parkering P53
Parking P53

Application and follow-up

The content of this Code of Conduct only has meaning if we together succeed in applying it in our everyday lives. In addition to reading the document, we also need to talk to one another about what it means for us and our work. We therefore carry out dialogues on these issues on a regular basis, for example, through discussions based on different dilemmas at our workplace meetings.

For employees at Swedavia, the Code of Conduct in force at any time is a governing document that you sign when you are hired. For suppliers, Swedavia's Code of Conduct is part of their agreement with us. We also expect all of our partners and customers to comply with this Code of Conduct.

For leaders, you are also responsible for providing your employees with the right conditions in order to comply with the requirements in this document. Regarding these matters, it is especially important that you lead by being a good role model.

Continue to keep this conversation about responsibility and ethics going!