

Code of Conduct



Swedavia
Airports

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Introduction

Swedavia shall be characterised by being *reliable, committed, innovative and welcoming*. We care about how we treat each other and how we behave towards customers, suppliers and other stakeholders. That also concerns our conduct towards the world around us. We work actively with ethical and social issues, something we believe are the cornerstones of a modern and sustainable company.



Swedavia's Code of Conduct

Every business has a purpose. At Swedavia, we are proud that we make it possible for people to meet. That's why we go to work every day. But business enterprise is also about taking responsibility. About seeing one's role in the larger societal perspective and doing what is necessary to ensure that the impact one has on one's surroundings is positive.

Guiding Swedavia's work are international guidelines, Agenda 2030 and the global goals for sustainable development, as well as the state's ownership policy. We stand behind and perform our activities in accordance with the ten principles of responsible business in the UN Global Compact. These principles are based on the UN's declaration on human rights, the ILO's basic conventions on basic labour rights, the Rio declaration and the UN convention against corruption.

Swedavia shall be characterised by being *reliable, committed, innovative and welcoming*. We care about how we treat each other and how we behave towards customers, suppliers and other stakeholders. That also concerns our conduct towards the world around us. We work actively with ethical and social issues, something we believe are the cornerstones of a modern and sustainable company.

It is self-evident that we comply with laws, regulations, international conventions and agreements that affect our activities. The Code of Conduct is Swedavia's collective ethical guidelines that complement and develop our values and ethical approach. It has a clear starting point in our purpose and clarifies how we are to act to comply with the demands of our business activities with a methodology that we are proud of.

All of these are self-evident basic prerequisites for Swedavia to be a credible and socially supporting actor that contributes to positive social development, and that our stakeholders and ourselves as employees can be proud of.

Stockholm, April 25, 2025

Jonas Abrahamsson,
President and CEO, Swedavia

The Code of Conduct applies to all employees regardless of position, and it is the responsibility of all managers to make these guidelines known and ensure that they are followed. All employees at Swedavia always have their own responsibility to familiarise themselves with and comply with our Code of Conduct.

The Code of Conduct also applies to all our suppliers, and we also work to ensure that our customers and partners are aware of and comply with Swedavia's Code of Conduct.

Business ethics at Swedavia

The framework for Swedavia's business ethics is as a matter of course all the laws and regulations the company must comply with - but it is also important for us to set higher ethical requirements than those required by law. Our business ethics are our inner ethical compass.

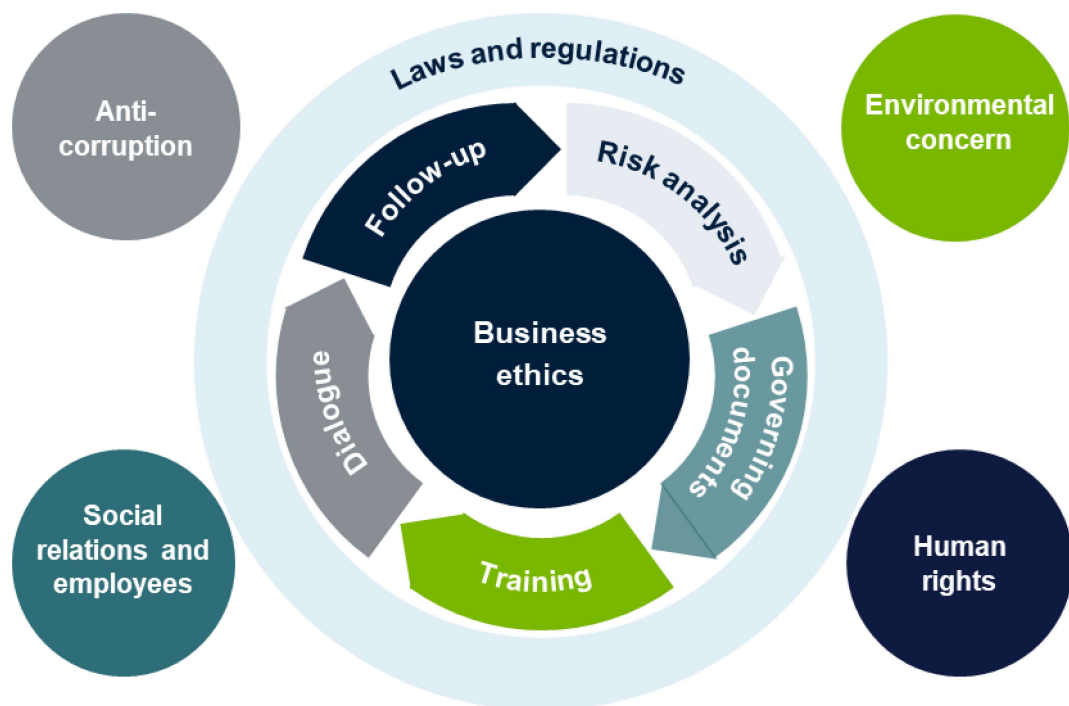
The core for us is to work together and always safeguard good business ethics. Swedavia's Annual and Sustainability Report contains four areas that together make up the so-called Sustainability Report. At Swedavia, we have decided that good business ethics means that we relate well to the four areas of the Sustainability Report; Anti-corruption, Human rights, Social conditions and personnel and Environment.

For us at Swedavia, these areas are therefore particularly important to work with in order to be a modern, reliable and sustainable company. As a matter of course, we expect our suppliers, partners and customers to also protect and work with these issues.

The follow-up of how we work in these areas takes place on an ongoing basis and is also reported in the Annual and Sustainability Report.

Good business ethics are fundamental to Swedavia's sustainability work. For each of the four areas, we work according to the process shown in the image below. ¹ We carry out an overall risk analysis together with the Risk Manager at Swedavia and also develop measures to limit risks. We make sure to have clear governing documents that are reviewed and updated annually. We conduct training for employees in Swedavia and work with advice, ensuring that an active dialogue is maintained internally and create opportunities for follow-up.

¹ With regard to human rights and the environment, we work according to a due diligence process.



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

Whistleblower function

Swedavia has a whistleblower function that gives all employees in Swedavia² the opportunity to through reporting channels report irregularities in a work-related context where there is a general interest that it comes to light. Examples of what is in the public interest are irregularities in areas that are of importance to society at large. Customers, suppliers and other stakeholders with links to Swedavia also have the same opportunity to report. The whistleblower function is required by law and has also been adopted by Swedavia's Board of Directors.

You can find more information about this on Swedavia's intranet and on our external website.

² but also self-employed people, volunteers and interns, people who are part of a Swedavia's administrative, management or supervisory body.

Anti-corruption

Swedavia's business decisions are based in every case on objective grounds and criteria. We always follow set safety and sustainability requirements. We respect and follow rules of competition, labour market legislation, agreements, safety requirements and other conditions that set the framework for our activities. All business transactions are done with professionalism, sound ethical principles and high integrity and we expect this from our business partners as well.

We are well aware that things that are not forbidden can still be inappropriate. It is therefore important that we have a good internal dialogue. In case of doubt, you should always consult your immediate manager if there is one, but at the end of the day it is your responsibility.

The Code of Conduct is one of our governing documents in our work with anti-corruption. Swedavia has also established a special Anti-Corruption Policy and Guidelines for External Representation, which are governing documents that everyone must comply with at Swedavia. The guidelines contain detailed guidance on how we as Swedavia employees should relate to external contacts. The anti-corruption policy also refers to Swedavia's employees having to comply with the Swedish Anti-Corruption Institute's "Code regarding gifts, monetary awards and other business benefits". Swedavia has also committed itself to the Swedish Anti-Corruption Institute's Code to Prevent Corruption in Business and the Joint Initiative to Prevent Bribery and Corruption (ÖMK); an agreement between Swedish suppliers and clients in the public-financed construction and property sector. For employees at Swedavia who work with the construction and real estate sector, there is further practical help to do the right thing through examples and ethical guidance. All documents are available on Swedavia's intranet.

Corruption and improper influence

Swedavia is completely opposed to all forms of corruption. You must never offer or receive monetary gifts or inappropriate rewards that could in any way be interpreted as business or personal benefits for yourself or others.

Swedavia also opposes all forms of attempts to inappropriately influence our employees. No employee or manager may accept any form of remuneration that might be perceived as corruption, questionable payment or bribery. We also refrain from actions that might be perceived as an attempt to inappropriately influence a recipient's decision.

Gifts and representation

All representation is in accordance with the business practice and legislation that applies to the markets in which we are active. We always consider carefully whether we can offer or receive gifts and/or benefits or permit ourselves to receive entertainment. Consult your immediate manager when in doubt and take support from the guidelines mentioned above. You are however personally responsible for the decisions you take.

Private interests, conflicts of interest and agreements with related parties

Swedavia's employees may not, either for themselves or for those close to them, draw benefits from business opportunities that actually belong to Swedavia. It is also self-evident that they may not use information, property or position for personal gain. If you are involved, directly or indirectly, in contacts with tenderers, suppliers or customers, you are not allowed to have private business or transactions with them.

Each employee refrains from situations where personal interests may conflict with Swedavia's best interests.

Secondary employment, other assignments or ownership in external activities

Involvement through various secondary occupations is seen as positive. However, they must not affect the work in a negative form or come into conflict with Swedavia's business interests. As an employee of Swedavia, you are of course not allowed to have any other employment or perform work for others during your working hours without prior written approval from your immediate manager. The same applies to board assignments and advice for – or ownership of – customers, suppliers, partners or competing businesses.



Human rights

Running airport operations is a complex process that can potentially affect the human rights of many different stakeholders. Swedavia respects all internationally recognised human rights and commits to and runs its operations in accordance with the UN Guiding Principles on Business and Human Rights. This means that Swedavia commits to the principle of not causing, contributing to or, through its operations, being linked to adverse impacts on human rights.

Swedavia's view is that all people are of equal value. This means that we respect the personal value, integrity and rights of every person we come into contact with in our work. Equal treatment and equal opportunities apply to everyone regardless of age, gender, transgender identity or expression, ethnicity, religion or other belief system, disability, sexual orientation, political beliefs or social status. All Swedavia's employees have freedom of association and organisational freedom.

Swedavia works for sustainable development and sees that employees from diverse backgrounds bring human benefits and business benefits to the business. Our goal is to achieve gender equality and to have at least the same proportion of employees with a foreign background as within the demographics of society. We are convinced that diversity contributes to greater creativity and development power and thereby the Group's competitiveness and attractiveness.

Our relations with others and each other are marked by mutual respect and humanity. Everyone can expect to be respected for what he or she is. No form of discrimination, victimisation or reprisals may occur and everyone should feel welcome with us.

As a responsible company, Swedavia conducts continuous work to proactively identify and manage risks linked to human rights throughout the value chain. As part of our work to ensure social responsibility in our value chain, we require our suppliers to work actively with their suppliers and subcontractors to ensure that the business respects and supports internationally recognised human rights, and that they take steps to avoid causing, contributing to or being linked to adverse human rights impacts.

Social relations and personnel

Our employees are Swedavia's most important asset. It is through the commitment, reliability, motivation and competence of our employees that we create the atmosphere where employees and customers thrive and the business develops and can make a difference.

Every employee is an ambassador. We are especially attentive when we represent Swedavia in different fora and contexts, when we wear clothing that bears the company name or travel in vehicles with the company's logo. This also applies when we act in digital environments, such as social media, discussion forums, e-mail, visit websites or interact with others online.

Confidentiality

At Swedavia, all employees take part in the concept of confidentiality when they sign their employment contract. We do not comment on or disclose information that may give third parties access to sensitive information. We are cautious when discussing internal business or other matters relating to Swedavia in order to reduce the risk of the information reaching unauthorised persons by mistake. Confidentiality also applies after the employment or contract with Swedavia has ended.

Physical assets

Swedavia has a large number of physical assets in its operations. The goal is to give each employee the tools, in the form of equipment and information, that are needed in their daily work. We prevent unnecessary wear and tear, damage or other losses. Equipment and other assets may not be used for private purposes or for personal gain.

Intellectual property

Intellectual property is important to Swedavia's operations and results. This may encompass, for example, specialist knowledge, methods, concepts and ideas that we have developed and use in our professional practice. We also protect and manage these in Swedavia's interest. We also respect the intellectual property of others and shall not infringe such rights. Unless otherwise specified by law or a decision by the authorities, we shall not make trade secrets or other important information about Swedavia available to unauthorised persons until we have received a signed Non-Disclosure Agreement (NDA). Intellectual property can spread quickly and take a hold on the internet via reckless wording on social media, for example. Consequently, we reflect and think about how we express ourselves in these contexts.

IT assets

Swedavia's employees have access to IT equipment with e-mail, the Internet and various applications in order to have access to the information and services needed for their work. We follow the security rules that apply and have a personal responsibility for the IT equipment and its use. We do not lend our identity or ever give out our password to anyone else. Nor do we use Swedavia's IT equipment and IT services to harm Swedavia or third parties.

Information

All information that is important for Swedavia's governance, decisions, trust, goodwill, sustainability, profitability or production is classed as business information. We handle business information carefully. We are all involved in ensuring that the information is accessible, accurate and that the right permissions govern the protection of the information. We always report suspicions of breaches, unlawful handling or other incidents where Swedavia's information is handled.

Protection of personal integrity in the processing of personal data

Swedavia cares about the privacy of our customers, partners and employees, and we are keen to comply with applicable rules on data protection. The General Data Protection Regulation entails enhanced protection for the persons whose personal data is processed and imposes requirements on companies and individuals who process this personal data. The regulation states, among other things, that *"the protection of physical persons with regard to the processing of personal data is a fundamental right"*.

In order for Swedavia to comply with the law, all employees must have knowledge of the regulation and comply with the internal regulations that have been set up. All employees at Swedavia are therefore trained in this legislation, and there is information on the intranet and good opportunities for internal advice and dialogue on these issues.

About the workplace environment in particular

The health and safety of the employees is a high priority in Swedavia's activities and projects. Concern for safety applies to all forms of work environment, both organisational, social and physical – no one in Swedavia's operations should risk health and safety at their workplace. Everyone must be aware of or have the opportunity to obtain information about legal requirements and other rules and processes relating to their own duties. All employees and other stakeholders in our business are responsible for being involved and contributing to the work of creating their own and a common safe work environment. The responsibility includes reporting risky conditions that have caused, or risk having, injury or ill health.

Through everyone's participation in reporting and taking care of shortcomings, we ensure the work with preventive measures.

Risks and protective measures

Everyone shall have information about the risks in their work and how the work is to be carried out in a safe way and how safety equipment is to be used. Maintenance and control help to ensure that the risk of injury and ill health is minimised. Together, we strive for continuous improvements in the work environment to prevent all types of injuries and ill health.

Victimisation, discrimination and reprisals

At Swedavia's workplaces, there shall be no form of victimisation, discrimination or reprisals. Swedavia works preventively and systematically with these issues by conducting ongoing work to map, analyse, remedy and follow up.

Drugs and alcohol

The consumption of alcohol or the use of drugs at work, or that even risks affecting work, is in all respects unlawful and incompatible with Swedavia's operations. Being sober at work is self-evident and all employees naturally completely abstain from all non-medical use of narcotics-classified preparations, anabolic steroids and similar mind-altering substances. All employees and consultants are drug tested when new employees are hired, and random drug tests are carried out in all operations.

Social media

Our engagement in social media spreads our messages and strengthens our brand. It also strengthens the image of our company as open and accessible. As an employee, you are always present as an individual, but your participation in social media affects not only the image of you, but also the image of Swedavia.

It is very important that you distinguish between when you participate in social media within the framework of your employment and when you participate privately. You are always personally responsible for what you publish on your own initiative, regardless of whether the publication has taken place in your capacity as an employee or privately. You may never open or run social media accounts in Swedavia's name without approval. Information that is detrimental to Swedavia may constitute a breach of the duty of loyalty in the employment contract.

If you are unsure of what you are entitled to do and what is allowed within the framework of your employment, for example posts in your own name that concern Swedavia, you should ask your immediate manager and also get support from Swedavia's guidelines regarding social media.





Environment

At Swedavia, we actively work to create a culture based on interest and commitment in how each of us can help to reduce effects on the environment. Environmental considerations permeate our activities and are considered in every decision. We acquire the knowledge required to be able to perform our tasks in a way that reduces the impact on the environment, as we know that the environmental impact of aviation is of crucial importance for the development of aviation.

At Swedavia, we strive to reduce the negative environmental impact of airports and contribute with our work to achieving the environmental quality objective "limited climate impact". We are aware of how we affect the environment and this knowledge allows us to work preventively to prevent unnecessary environmental impact and unnecessary environmental risks. We have systematic controls of how our operations affect the environment and we carry out the necessary investigations to see how we affect our surroundings. We also work to ensure that other actors reduce their environmental impact. In line with Swedavia's environmental goals, all active operations at the airports will be fossil-free by 2025 and transport to and from the airport will also be fossil-free by 2030. In this way, Swedavia can enable a transition for the transport industry in the regions where Swedavia operates.

Our goal is to reduce emissions of climate-impacting gases in accordance with the Paris Agreement's 1.5-degree target and to increase the share of sustainable aviation fuel (SAF). At the end of 2020, we reached our target of zero tonnes of fossil carbon dioxide emissions from our own airport operations. We are now taking the next step and striving for our airports to become completely fossil-free by involving and strengthening our collaboration with our suppliers and partners further to jointly reduce emissions of climate-impacting gases.

We work to achieve resource-efficient operations, to reduce energy use and to reduce emissions of pollutants to air, soil and water. We conduct operations at our airports in a way that benefits biodiversity, work actively to reduce noise pollution and ensure that exposure is perceived as acceptable in relation to the social benefit of aviation. We ensure that we handle chemicals responsibly and strive to replace chemicals that are harmful to health and the environment with less harmful ones. We minimise the amount of waste in several ways. Firstly, we ensure the prevention of the generation of waste, secondly by recycling products and thirdly by recycling materials or the energy contained in them. When building new buildings and renovating our properties, we strive to make energy efficiency and ensure that the choice of materials and solutions is sustainable.

We improve our knowledge of the climate impact from large construction and civil engineering projects, with the aim of ensuring climate-smart future infrastructure. By 2040, Swedavia's construction and civil engineering operations will have net zero emissions.

An important contribution to sustainable development is that we set environmental requirements when procuring services and products. Through close collaboration with our suppliers, we can contribute to a better environment together. The supplier is expected to have a good understanding of the life cycle perspective and where the environmental impact occurs in its own operations.



Application and follow-up

The content of this Code of Conduct is only of significance if together we manage to apply it every day. As well as reading the text, we also need to talk to each other about what it means for us and our work. We therefore have ongoing dialogues on these issues, for example through discussions based on various dilemmas at our workplace meetings.

As an employee of Swedavia, the Code of Conduct in force at any given time is a governing document that you sign when you are hired. As a supplier, Swedavia's Code of Conduct is part of the agreement with us. We also expect all partners and customers to comply with this Code of Conduct.

As a manager it is also your responsibility to give your employees the right conditions for being able to comply with the requirements in this document. With these issues, it is extremely important that you lead by setting a good example.

Continue to keep the conversation about responsibility and ethics alive!