This document is an in-house translation of the Swedish code of conduct. In the event of discrepancies, the Swedish original will supersede the translation.

# AB Sagax Supplier Code of Conduct

Adopted by the Board of AB Sagax on 8 May 2025

## 1. Background

Sagax's Code of Conduct sets the standard for ensuring that the working conditions at the companies that supply goods and services (the Suppliers) to Sagax are safe, that their employees are treated with respect and dignity, that the operations are conducted in an environmentally conscious manner, that a high ethical standard is maintained in the business and that the companies are loyal to Sagax.

The Code of Conduct is based on the UN Global Compact's ten principles, OECD Guideline for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights, as well as on Sagax's identification of relevant sustainability issues in relation to its suppliers.

## 2. Applicability

The Code of Conduct applies to Suppliers as well as their sub-suppliers. Sagax requires that its Suppliers ensure compliance with the stipulations of this document in both the Supplier's and the sub-supplier's organisation.

# 3. Working Conditions and Work Environment

Sagax expects its Suppliers to respect applicable laws and regulations, as well as collective agreements and generally accepted industry standards concerning employee rights and wages. Sagax requires its Suppliers to promote equal rights and opportunities regardless of gender, gender identity or expression, ethnic origin, religion or other belief, disability, sexual orientation, or age.

All work must be conducted voluntarily. No form of forced labour or work associated with threats or punishment is permitted. Suppliers must respect employees' rights to freedom of association and to join trade unions. Sagax requires its Suppliers to ensure that no child labour occurs. Wages must be paid directly to the employee in full and on the agreed-upon date. Working hours must not exceed what is stipulated by applicable laws and regulations.

Sagax requires its Suppliers to ensure that their employees' work environment is safe and healthy, in accordance with applicable laws, regulations, and collective agreements. Accidents and occupational injuries must be prevented. Necessary protective equipment must be provided, and employees must be informed of health and safety risks. Suppliers should strive to systematically improve the work environment and take preventive measures to promote employee health.

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#### 4. Environment

Sagax requires that its Suppliers meet all applicable environmental laws and regulations. Wherever possible, Suppliers should always exercise great caution in regard to issues that affect, or may affect, the environment.

Suppliers shall strive to reduce the negative environmental and climate impact of their operations. Suppliers should also take the initiative to promote greater environmental responsibility and encourage the widespread use of eco-friendly technologies to facilitate long-term, sustainable development.

#### 5. Ethical Business Conduct

Sagax requires its Suppliers to maintain the highest ethical standards in all aspects of their business operations. Suppliers must comply with all applicable laws and regulations and are expected to actively prevent and counteract all forms of corruption, bribery, and undue influence.

Suppliers must operate in full compliance with applicable competition laws. In the event of a potential or actual conflict of interest, Suppliers are obliged to promptly notify Sagax. This includes situations where a Sagax employee may have any form of financial interest or other connection to the Supplier.

All financial transactions must be accurately recorded and reported in accordance with applicable laws and generally accepted accounting principles.

Should a Supplier gain access to information deemed confidential, it must be handled with the utmost care and discretion. The Supplier is also expected to immediately inform Sagax of any such occurrence.

### 6. Loyalty

Sagax requires that its Suppliers act in Sagax's best interests in all situations.

Suppliers are expected to represent Sagax in the best possible way in their contact with Sagax's tenants or any of their customers. The Suppliers' employees are to conduct themselves professionally and pleasantly when performing all assignments for Sagax. In addition, employees are to provide a high level of service and sensitivity in order to safeguard Sagax's own needs and those of its tenants.

The Suppliers' employees are to be similarly attired and smartly dressed. They are also to wear identity identification ID-06, or other equivalent form of identification, in a visible place.

The Suppliers' employees must have the necessary training, skills, authorisation, experience and language proficiency required for performing their duties for Sagax and their tenants.

#### 7. Evaluation

The supplier is to facilitate checks of compliance with this Code of Conduct (for example, complete or partial verbal or written checks, announced and unannounced audits and/or on-site inspections/spot

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checks, etc.). Suppliers may be asked to provide information that Sagax requires regarding the standard stipulated in this Code of Conduct. This information will form the basis for evaluating and benchmarking the Suppliers. Sagax is also to be given the opportunity to evaluate workplaces to monitor compliance with this standard.

If Sagax performs or assigns a third party to perform such a check, the Supplier is to cooperate fully so as to achieve the purpose of the check. Accordingly, for example, the Supplier is, as soon as possible on request, to provide the information requested by Sagax (or an independent auditor engaged by Sagax) and also to provide access to production sites or similar as required for the check to be performed appropriately.

Sagax encourages its Suppliers to evaluate and monitor their sub-suppliers since the information regarding their compliance with this Code of Conduct may be requested by Sagax.

If the Supplier does not comply with the Code of Conduct, Sagax reserves the right to cease purchasing from the Supplier and terminate the agreement. If a Supplier fails to comply with the Code of Conduct, Sagax may, in certain cases, choose to engage in a dialogue with the Supplier with the aim of ensuring that deviations are addressed, and necessary improvements are implemented by the Supplier.

By having an authorised representative of the Supplier sign the document, the Supplier certifies that it accepts and will comply with the Sagax Code of Conduct for Suppliers.

Location and date
Enter company name ("Supplier")
Enter Corporate Registration Number
Name in block letters
Enter position