

**GROUP POLICY**

**REJLERS AB**

**CODE OF CONDUCT**

<b>Prepared by</b>	<b>Officer</b>	<b>Revision date</b>
Head of Sustainability / Quality and Sustainability Board	Head of Sustainability	17 March 2023

<b>Approved by</b>	<b>Date</b>
The Board of Directors of Rejlers AB	20 April 2023

## 1. BACKGROUND

Rejlers is one of the leading engineering consultancy firms. With our vision “Home of the learning minds” as a beacon, we create a platform for continuous learning, development, and growth. Increased learning that creates added value for both clients and employees. We provide cutting-edge expertise in technology areas such as energy, industry, infrastructure, real estate, and telecom. Our operations place great demands on us to act responsibly in all situations. Thus, it is critical that we will contribute to sustainable development in which business ethics, anti-corruption measures, the environment, human rights, and work conditions play key roles. Every day, we will contribute to make the world and more sustainable place – for our clients, employees, owners, and the societies in which we operate by propagating our knowledge.

## 2. VALUE PROPOSITION

We aim beyond client expectations to be rewarded with lasting trust. With our technical know-how and expertise in digitalisation and reducing environmental footprint we are committed to combine continuous innovation with respect for the planet whilst adding value to our clients’ and partners’ business. We welcome challenging assignments by engaging the passion of our talented people, who believe there is always a better way. We deliver business value through decades of experience, combined competences, and market insights.

## 3. PURPOSE

Rejlers’ Code of Conduct aims to detail our requirements and expectations in respect of our own behaviour and conduct, as well as how we behave towards each other and the world around us, both as a company and as employees. This is our way of contributing to high business ethics and a sustainable development. The Code of Conduct is the foundation of our ethics culture and define the core of our business conduct.

## 4. POLICY APPLICATION - WHO MUST FOLLOW THE CODE

The Code of Conduct applies to all employees and everyone acting on behalf of Rejlers, including the Chief Executives and Board of Directors. We also expect our business partners to commit and uphold the same high ethical standards.

## 5. WHAT IS EXPECTED FROM US

<b>The Board</b>	Decides on the code of conduct within the Group.
<b>CEO</b>	Is responsible for the code of conduct being available within the Group and for action plans and procedures for code compliance being documented (as also any cases of non-compliance with said code).
<b>Leaders</b>	Over and above the ultimate responsibility of the Board and CEO, it is also each manager’s responsibility to ensure that the content and the spirit of this document are communicated, understood, and complied with within the organisation and by Rejlers’ suppliers, partners and clients.
<b>All employees</b>	All employees have a responsibility to keep up to date with and fulfil client requirements, current legislation, and regulations as well as and the requirements in this Code of conduct. Any violations shall be reported to the management or in the whistle-blower system.
<b>Business Partners</b>	We expect our business partners to meet our standards and respect our codes and ethical values when working with or for us.

## 6. OVERALL GOALS

The goals of this Code of Conduct are to clarify and to crystallise the responsible behaviour defined by the group so that those covered by the policy act in accordance therewith and avoid behaviour and decisions that are not accepted.

Our Code of conduct is based on our three core principles:

### Open-Source Culture

With a culture of knowledge and a curious mindset, we are constantly learning new things, both from each other and through our projects. We willingly share each other's knowledge and exchange new insights from our clients, across all our areas of operation. With the latest technology and our extensive expertise, we bring new knowledge to our clients and help them make choices that contribute to a sustainable future.

### Love the Challenge

We take on major challenges with enthusiasm and confront them with innovative solutions that may have never been seen before. The knowledge we build is used throughout the business and prepares our clients for what lies around the corner. There is no greater challenge than building a sustainable society. It is in our DNA to seek solutions that hold up over time, and we wish to take the lead in this endeavour.

### Brilliant Networks

We are a trusted supplier. Through our networks we can combine the speed and adaptability of a smaller company with large-scale expertise. Our unique partner networks let us tailor solutions to meet our clients' specific needs. We have manifold contacts in both business and academia providing us with knowledge about new and sustainable technologies being developed.

## 7. HUMAN RIGHTS

Rejlers supports and respects the ten human rights principles of the UN's Global Compact.

1. Support and respect international human rights.
2. Ensure that the company is not complicit in human rights abuses.
3. Uphold freedom of association and recognise the right to collective bargaining.
4. Eliminate all forms of forced labour.
5. Abolish child labour.
6. Eliminate discrimination in respect of employment and occupation.
7. Support a precautionary approach to environmental challenges.
8. Take initiatives to promote greater environmental responsibility.
9. Encourage the development and diffusion of environmentally friendly technologies.
10. Work against corruption in all its forms, including extortion and bribery.

Rejlers respects everyone's rights to form and/or be part of a trade union that looks after their interests as an employee; and, be organized so that collective or individual bargaining is possible. We also respect the right to refrain from being a member of a trade union.

Rejlers should not employ or use any form of forced, bonded or compulsory labour, and shall strictly prohibit any form of slavery or human trafficking.

## 8. BUSINESS ETHICS PRINCIPLES

Rejlers' business operations are based on high ethical standards. In each country where we are active, we do business within the framework of laws, regulations, and international conventions.

We are reliable and honest in our interaction with clients and live up to the agreements and undertakings we have committed to. Our clients shall feel secure and that we always do our utmost for our shared business venture to be as successful as possible.

Rejlers does not take part in or support any corrupt operations. We do not accept any suppliers or partners who offer bribes, and we will take the necessary measures if such behaviour is discovered.

At Rejlers, we do not tolerate abuse of power or any form of corruption. Rejlers' employees and partners shall not: take part in activities that lead to conflicts of interests-, nor exploit, for their own gain, relationships with clients. Thus, in our interactions with clients, subcontractors, suppliers, and other stakeholders, we shall exercise great caution as regards offering benefits or activities of various types for any contact or relationship-promoting purpose.

In order to avoid conflict of interest situations, close relationships between colleagues who are in a position of dependence on each other are not allowed. We strive for transparency. Therefore, employees should inform the employer about relationships that may have an impact on work.

Rejlers does not take any party-political stances. We do not provide economic or other support or aid to individual politicians or political parties.

Rejlers' employees and partners shall maintain strict confidentiality as regards information and business secrets concerning Rejlers' present and future business operations.

Rejlers has a "Supplier Code of Conduct" that shall be respected by our partners and suppliers.

## 9. COUNTERACTING DISCRIMINATION

As an employer and as a commissioner of work, Rejlers shall be characterised by respect for the individual. The entire organisation shall be pervaded by our basic attitude towards the equal value of all people and the right to equal treatment.

As regards influence and responsibility, workplace design, continuous professional development and salary progression, the ways in which we act towards our co-workers and partners shall be independent of gender, gender identity or gender expression, ethnic affiliation, religion or other beliefs, sexual orientation, disability, or age. The same applies to recruitment. Diversity is preferred when recruiting.

At Rejlers, we work for equal rights regarding appointments, salaries, positions, promotions, disciplinary measures, and dismissals.

## 10. OCCUPATIONAL HEALTH AND SAFETY

Rejlers provides a healthy, safe, and secure workplace.

Good management and functional cooperation between the employer and employees are essential for creating good working relationships and to be able to continually improve wellbeing and safety at work.

## **11. ENVIRONMENT AND SUSTAINABILITY**

Rejlers is committed to protecting the environment and contributing to the prevention of climate change.

We shall work internally and with our partners to use our competency to always create environment friendly and sustainable solutions.

## **12. QUALITY**

At Rejlers, quality means doing the right things the right way at the right time, to meet and exceed our clients' expectations. Orderliness, on-time, and high-quality deliveries as well as well-being at work are Rejlers' main quality objectives.

Responsibility for quality at Rejlers is shared by all employees and requires the participation of every employee in the work with continual improvement of the quality management system.

We see these statements as a commitment for management and personnel to meet all applicable requirements from clients and other stakeholders that we are subject to.

## **13. INFORMATION SECURITY**

Rejlers manages information of high value and importance for itself and its stakeholders. Our goal is that clients and other stakeholders should be able to fully trust that we handle information in a secure and correct way according to business agreement, best practice and applicable laws.

We earn trust by protecting all personal and client data. We hold personal data on all our employees, business data on clients and we have an obligation to protect it and only use it for legitimate business purposes.

All personal and business data is to be considered confidential.

## **14. EXTERNAL COMMUNICATIONS**

Rejlers and the employees always act responsibly in our external communications. Our employees are encouraged to reshare achievements, open positions, and project information as agreed with the clients, on their social media platforms.

## **15. COMPLIANCE**

General compliance with this code is regularly discussed and procedures have been drawn up for the continuous recognition and evaluation of compliance. There is also a "whistleblowing" process for reporting any irregularities. This service is entirely handled by a third party and adheres to stringent security requirements as regards, amongst other things, the whistle blower's anonymity.

Rejlers is required by law to establish a sustainability report, in connection with the annual report. The sustainability report includes the work and progress in the areas in this code of conduct.

The code is explained in more detail in separate policy documents.

## **16. UPDATING OF THE CODE OF CONDUCT**

This policy has been adopted by the Board of Rejlers AB and shall be reviewed annually on the initiative of the company's Head of Sustainability.