

## GROUP POLICY

### REJLERS AB

#### CODE OF CONDUCT

Prepared by	Officer	Revision date
Head of Sustainability / Quality and Sustainability Board	Head of Sustainability	19 March 2025

Approved by	Date
The Board of Directors of Rejlers AB	24 April 2025

#### 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 a better 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 defines the core of our business conduct.

### 4. POLICY APPLICATION

The Code of Conduct and its attachments apply to all employees and everyone acting on behalf of Rejlers, including the Chief Executives and Board of Directors.

The code is explained in more detail in the following separate policy documents:

- Business Ethics Policy
- Counteracting Discrimination Policy
- Environmental policy
- Information Security Policy
- Occupational Health and Safety Policy
- Travel and Meeting Policy
- Quality Policy

### 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 Code of conduct and its attachments 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 and its attachments. 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 and we have a separate Code of conduct for our suppliers.

### 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.

We respect internationally recognised human rights, including those expressed in the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization's Core Conventions and Declaration on Fundamental Principles and Rights at Work. 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 organised so that collective or individual bargaining is possible. We also respect the right to refrain from being a member of a trade union.

Rejlers shall 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.

To avoid conflicts of interest, 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.

The following areas are covered by our policy for business ethics:

- Competition law
- Money laundering
- Taxation
- Corruption
- Employment and industrial relations
- Human rights and transparency
- Gifts, donations and sponsorship
- Counterfeit products
- Financial responsibility
- Sanctions and export controls

## 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**

Rejlers strives to meet and exceed our clients' expectations.

Responsibility for quality at Rejlers is shared by all employees and requires the participation of every employee to ensure high quality outcomes and to work towards continual improvement of the quality.

### **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. When we handle personal data of our employees and business data of clients we have an obligation to protect it and only use it for legitimate business purposes.

### **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.

### **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.