

GROUP POLICY

REJLERS AB

CODE OF CONDUCT

Prepared by	Officer	Revision date
Head of Sustainability	Head of Sustainability	19 March 2021

Approved by	Date
The Board of Directors of Rejlers AB	22 April 2021

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 customers 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 strive for contributing to the society in a positive way by spreading our knowledge.

2. VALUE PROPOSITION

We aim beyond customer expectations in order to be rewarded with lasting trust. With our technical know-how and expertise in digitalisation we are committed to combine continuous innovation with respect for the planet whilst adding value to our clients’ 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, both as a company and as employees. This is our way of contributing to high business ethics and a sustainable development.

4. POLICY APPLICATION

This policy covers all employees in Rejlers Group, partners and the company's Board of Directors. This policy is also applicable for our customers and suppliers.

5. RESPONSIBILITIES AND ROLES

The Board	Decides on the code of conduct within the Group.
CEO	<p>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).</p> <p>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 customers.</p>
All employees	All employees have a responsibility to keep up to date with and fulfil customer 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 whistleblower system.

6. OVERALL GOALS

The goals of this policy 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 values:

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 customers, across all our areas of operation. With the latest technology and our extensive expertise, we bring new knowledge to our customers 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 customers 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 to our customers. 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 customers' 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.

8. BUSINESS ETHICS PRINCIPLES

Rejlers' business operations worldwide 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 dependable and honest in our interaction with customers and live up to the agreements and undertakings we have entered into. Our customers 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; or, exploit, for their own gain, relationships with customers. Thus, in our interactions with customers, 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.

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.

9. OCCUPATIONAL HEALTH AND SAFETY POLICY

Rejlers work to safe and healthy working conditions, which means that the following requirements will be met:

- Unhealthy physical and mental stress will be minimized
- Safety measures to prevent accidents and other industrial injuries
- The opportunity to alternate working postures
- The opportunity to influence your own situation regarding the layout of your workplace and planning of your work
- Accept differences from culture, gender, orientation and denomination

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

It's the employer who is ultimately responsible for the work environment in the company.

Managers at Rejlers, who have the practical opportunity to influence operations in organizational and financial terms, have a key responsibility for efforts to make a good work environment. Those responsible for the work environment are obliged to keep themselves up to date with current and coming laws and regulations relevant standard changes provisions and agreements and act proactively and accordingly to ensure Rejlers compliance to its commitments.

Employees are also expected to report about potential shortcomings of the management system and unsafe circumstances they encounter at work. Rejlers as an employer actively tries to either eliminate the unsafe or stressful factor or minimize the effects of such circumstances.

Health is a prioritised issue for Rejlers. Conditions shall be provided to promote wellbeing both within and outside work

There shall be a policy and action plan in place in every segment of the company covering all employees on preventing the abuse of alcohol and drugs or addiction to gambling.

10. FREEDOM OF ASSOCIATION

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.

11. 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, for example, 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. When recruiting new employees, we shall always strive to increase diversity.

At Rejlers, we expect our managers to comply with applicable laws against discrimination. Decisions regarding, for example, appointments, salaries, positions, promotions, disciplinary measures, dismissals and work conditions shall be based on people's abilities and/or performances and never on irrelevant personal factors.

This policy is a steering document in all types of discrimination where an individual's scope for action, options or personal integrity are violated. Anti-discrimination initiatives shall be a natural and integral part of all operations within Rejlers, the company's managers having a special responsibility for their implementation.

12. ENVIRONMENTAL POLICY

The most significant environmental impact occurs in our assignments when we assist our customers. This also gives us a great opportunity to help them reach their sustainability goals in turn by offering a deep knowledge about the sustainability impact of our solutions. Said gains can be anything from energy savings and superior material selection in our constructions to the development of renewable energy production and sustainable infrastructure.

Our employees and partners shall have insight into the importance of the environment and shall work to contribute to Rejlers goals as well as ensure compliance with international and national environmental and sustainability goals. We shall also contribute our knowledge and, together with our customers, make choices that promote sustainable development and prevent negative environmental impact.

Rejlers works systematically with environmental management by assessing environmental aspects and measuring and monitoring our environmental impact, as well as striving for a continual improvement of our performance.

13. QUALITY

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

Our customers and other relevant interested parties can expect that;

- We provide services and solutions with the ambition that customers will experience added value beyond what is agreed or expected
- We will have a constant drive for innovation and improvement to meet present and future demands from our customers
- We ensure the company's performance by developing the competence and skills of our staff and partners

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 customers and other stakeholders that we are subject to.

14. INFORMATION SECURITY

Rejlers manage information of high value and importance for itself and its stakeholders. Our goal is that customers 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 secure information security in our business and operations – to do this we;

- Protect our customers and other stakeholders by minimizing the risk for information security breaches,
- Take continuous actions to fulfil customers' and other stakeholders' requirements on information security,
- Govern internal and external information through strategies and processes,
- Invest in technology and competence to meet requirements and objectives for information security,
- Evaluate information security risks continuously,
- Ensure a high awareness by continuously inform and train our personnel and suppliers,
- Actively work with improvements with regards to information security

The Protective Security Act (or respective laws within the different countries of operation) entails that some of our employees and partners must undertake a security clearance in order to work in customer projects.

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 outside Rejlers and adheres to stringent security requirements as regards, amongst other things, the whistle blower’s anonymity.

16. SUSTAINABILITY REPORT

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.

17. UPDATING OF THE POLICY

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.