

# Introduction

#### **BACKGROUND AND PURPOSE**

Economic, social and environmental sustainability are the core pillars of the Länsförsäkringar AB Group's operations. The Länsförsäkringar AB Group's Code of Conduct for Suppliers is based on the UN Global Compact's principles and defines our basic requirements regarding human rights, labour, environment and business ethics.

The Länsförsäkringar AB Group expects its suppliers and sub-contractors to adhere to the principles described in this Code of Conduct or have equivalent standards adopted and conduct their business in accordance therewith.

#### **SCOPE AND EFFECTIVE DATE**

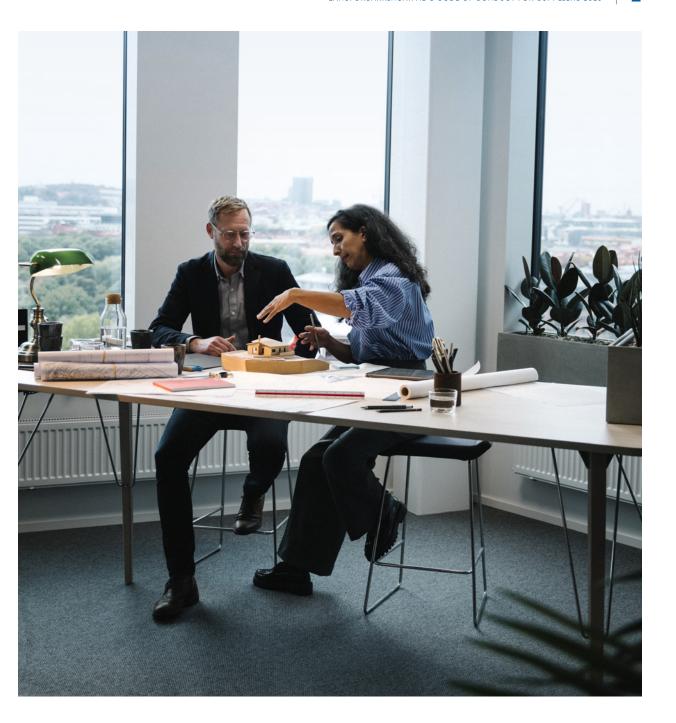
The Group's Code of Conduct for Suppliers is based on the UN Global Compact's ten principles for sustainable business and the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. The Code of Conduct defines our fundamental requirements regarding human rights, labour conditions, environment, and business ethics.

#### **COMMUNICATION AND INTRODUCTION**

The person in charge of the document is responsible for communicating the Code of Conduct to the operations by publishing it on the intranet and on Länsförsäkringar AB's website. The Länsförsäkringar AB Group's managers are responsible for communicating the code and ensuring its implementation in their areas of responsibility.

### Responsible business conduct

The supplier must comply with all applicable laws, rules and regulations in the countries where they carry out their business activities.





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# **Human rights and working** conditions

We expect our suppliers to support and protect human rights. All employees and contractors are to be treated fairly, with dignity and respect.

#### Freedom of association and collective bargaining

The supplier shall respect the rights of employees to freely associate and bargain collectively. In situations where the right to freedom of association is restricted by law, suppliers shall facilitate and not prevent alternative mechanisms for free and independent organisation and bargaining.

#### Wages and benefits

The supplier shall pay all workers at least the minimum wage and provide all legally mandated benefits in accordance with applicable laws and requlations. All employment conditions, total wage and legally mandated benefits, working hours, vacation time, leave periods and holidays must be consistent with applicable laws, regulations and mandatory industry standards.

#### Forced labour

The supplier shall prohibit any use of forced, bonded, indentured labour or involuntary labour. All work shall be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. The supplier shall not withhold wages, identity documentation or work permits as a condition of employment, neither shall they restrict the employee's movement.

### Child labour and young workers

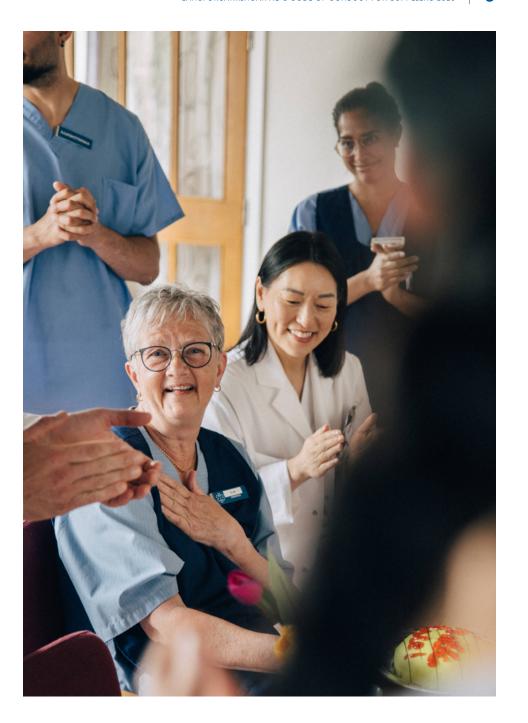
The supplier shall work to prevent all forms of child labour. The supplier may not employ children below the minimum age of employment or the age for completing compulsory education in that country, whichever is higher. The supplier must not employ any young workers under the age of 18 to perform work that is likely to be hazardous or harmful to their health and safety.

#### Non-discrimination

The supplier shall not practice any form of discrimination in hiring and employment practices. This also applies to employees' rights for training, promotion and remuneration. The discrimination criteria refers to: sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation and age.

#### Occupational health and safety

The supplier shall, through continuous risk assessments, ensure safe and healthy working conditions and workplaces or any other location where production or work is undertaken. Appropriate health and safety information, training and equipment shall be provided to all workers with such requirements in order to conduct their work in a safe and healthy manner.





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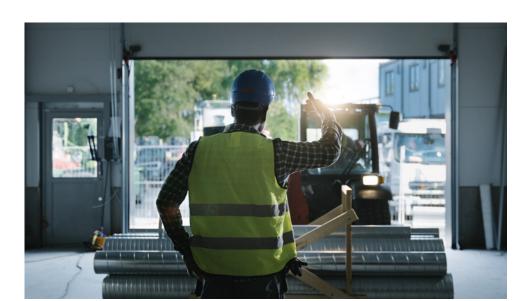
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# **Environment**

We expect the supplier to manage their operations responsibly in relation to environmental risks and impacts and adopt a precautionary approach in their business operations. The supplier shall endeavour to avoid and reduce waste and emissions to air, water and land as a consequence of their operations. Efficient technology that reduces the impact on the environment should be used as far as possible.

### Managing environmental risks

The supplier must possess all required environmental permits and licenses and comply with the requirements of such permits and licenses. Suppliers, whose activities have a material environmental impact, shall have a structured and systematic approach to take environmental aspects into account. This includes a suitable management system for managing environmental risks and protecting the environment, action plans, setting targets and performing follow-

ups of environmental activities. The supplier must ensure compliance with product-related requirements and may be required to declare the material content and origin of products delivered to the Länsförsäkringar AB Group. The supplier is to support the precautionary principle, meaning that the supplier will endeavour to avoid materials and methods that could generate environmental and health risks when better alternatives are available.

# **Business ethics and** business integrity

The supplier shall conduct their business in compliance with internationally agreed standards and rules on business ethics.

#### **Anti-corruption**

The supplier shall work to prevent all forms of corruption. The supplier must not engage in or tolerate any form of corruption, bribery, extortion or embezzlement. The supplier must not offer or accept any benefits to obtain any undue or improper advantage. Such improper benefits may comprise cash, non-monetary gifts, pleasure trips or services and amenities of any other nature.

#### **Conflicts of interest**

The supplier shall avoid conflicts of interest that may compromise the supplier's credibility within the Länsförsäkringar AB Group or other parties' confidence in the Group. If the supplier identifies a conflict of interest, it is the supplier's responsibility to immediately report it to the Group.

#### Protection of rights and information

The supplier must protect the information, electronic data and intellectual property and technologies and standards that the Länsförsäkringar AB Group grants them access to. The supplier shall comply with the obligation to not disclose confidential information, to not use the information except as permitted by the agreement or by law and to protect the information by safeguarding it against misuse, theft, fraud or improper disclosure.

#### Fair competition

The supplier is expected to compete in compliance with international and national competition laws and regulations regarding free and fair competition.

The supplier may not use Länsförsäkringar's business name, distinguishing features, brands or any assets controlled by Länsförsäkringar, unless agreed upon in writing with the Head of Communications of the Länsförsäkringar AB Group.





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# **Amendments**

The person responsible for updating the Code of Conduct for Suppliers is the Head of Strategy and Communication. This Code of Conduct is to be addressed and resolved on by the President and CEO once annually regardless of whether or not changes and updates are necessary.

## **Control systems**

The supplier shall have systems and controls in place to ensure compliance with the standards in this Code of Conduct or equivalent standards.

**Compliance** 

Business managers in the Länsförsäkringar AB Group are

responsible for ensuring that the Code of Conduct for Suppli-

that self-assessments and procedures are established in the

operations to ensure a high level of internal control.

ers is part of the supplier agreements that the Group signs and

The supplier's systems and controls shall also apply to their sub-contractors and partners who provide goods and services to the Länsförsäkringar AB Group. The Group will continually ensure that suppliers comply with the norms and principles found in this Code of Conduct.

#### **Consequences in case of violations**

Suppliers shall, without any delay, address any contraventions of this Code of Conduct that come to their knowledge and take proper actions to correct them. In the event of material contraventions that are not addressed according to the above, the Länsförsäkringar AB Group is entitled to terminate the agreement with immediate effect.

#### Communication and review

The supplier shall provide the Länsförsäkringar AB Group with all necessary information and provide the Group or its representatives with access to the relevant premises and documentation in order to verify compliance with this Code of Conduct.

The content of this Code of Conduct for Suppliers shall be reviewed on an ongoing basis. The supplier shall, unless otherwise agreed, always ensure that the latest applicable version of this Code of Conduct is followed and enforced.



The Code of Conduct for Suppliers was adopted by the President and CEO of Länsförsäkringar AB on December 23, 2023.

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## UN GLOBAL COMPACT

The UN Global Compact's ten principles for responsible business conduct are based on the UN declarations and conventions that are universally accepted by the international community. The Code of Conduct for Suppliers is based on the principles of human rights, labour, environment and anti-corruption.

Human rights		Labour		Environment		Anti-corruption
,	Support and respect the protection of internationally proclaimed human rights.  Make sure that they are not complicit in human rights abuses.	,	Uphold the freedom of association and recognise the right to collective bargaining.  The elimination of all forms of forced and compulsory labour.	,	Support a precautionary approach to environmental challenges.  Undertake initiatives to promote greater environmental responsibility.	Principle 10 Work against corruption in all its forms, including extortion and bribery.
		,	The effective abolition of child labour.  The elimination of discrimination in respect of employment and occupation.	Principle 9	•	

#### **REFERENCES**

The UN Global Compact's references to UN declarations and conventions that are universally accepted by the international community include:

- 1948 Universal Declaration of Human Rights (UDHR)
- International Labour Organization, specifically the documents listed below:
- Declaration on Fundamental Principles and Rights at Work from 1998
- Forced Labour Convention (No 29, 1930)
- Abolition of Forced Labour Convention (No 105, 1957)
- Minimum Age Convention (No 138, 1973)
- Worst Forms of Child Labour Convention (No 182, 1999)
- Equal Remuneration Convention (No 100, 1951)
- Discrimination (Employment and Occupation) (No 111, 1958)
- Freedom of Association and Protection of the Right to Organise Convention (No 87, 1948)

- Right to Organise and Collective Bargaining Convention (No 98, 1949)
- Guidelines on Occupational Safety and Health (ILO-OSH-200) YES
- UN Sustainable Development Goals
- UN Framework Convention on Climate Change, Kyoto Protocol
- Children's Rights and Business Principles
- ISO 26000: 2010 Guidance on Social Responsibility
- Social Accountability 8000
- UN Convention against Corruption
- OECD Guidelines for Multinational Enterprises
- Guiding principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework<sup>1)</sup>

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