



LÄNSFÖRSÄKRINGAR

Code of Conduct for Suppliers

Introduction

Background and purpose

Sustainable and responsible business is a core part of Länsförsäkringar's sustainability work. Responsible business practices aim to help manage risks and create long-term value for Länsförsäkringar's suppliers. The Code of Conduct ("Supplier Code") is Länsförsäkringar's tool to ensure that sustainability is integrated into the supply chain.

The areas covered in the Supplier Code are based on principles for responsible business which are, the UN Global Compact principles for responsible business, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights (see the Appendix). Länsförsäkringar shall ensure and follow up that its suppliers, as well as their direct sub-suppliers, comply with the expectations related to responsible business conduct described in this Supplier Code.

Definitions



SUPPLIER

The contracting party to the relevant company within Länsförsäkringar for the purchase of products or services. The collective term supplier refers to all types of suppliers such as subcontractors, consultants, intermediaries, and agents, regardless of geographical location. It also applies to the supplier's employees and consultants, regardless of employment status.



DIRECT SUB-SUPPLIER

A sub-supplier to the supplier who are directly involved in the delivery of services and/or products to a company within Länsförsäkringar.



Requirements for Suppliers

The Supplier Code expresses requirements regarding responsible business conduct towards potential and existing suppliers. Suppliers to Länsförsäkringar shall identify, manage, and comply with the requirements set out in this Supplier Code. Requirements outlined in the Supplier Code must be considered when entering a contract, through continuous follow-ups, as well as through engagement efforts when necessary. Potential and current suppliers are expected to act responsibly in accordance with this Code.

Suppliers must comply with applicable laws, rules, regulations and any industry standards in the countries where they carry out their business activities. If this Supplier Code conflicts with any of these, the highest standards must be followed. If Länsförsäkringar sets additional requirements these are found in the contract between Länsförsäkringar and the supplier.



Human rights and working conditions

The supplier shall respect and protect human rights in accordance with the UN Guiding Principles and the OECD guidelines (see the Appendix). All employees and contractors must be treated fairly, with dignity and respect. The supplier is expected to actively promote diversity and inclusion, which may also contribute to business benefits, competitiveness, and profitability.

Freedom of association and collective bargaining

The supplier shall respect the rights of employees to freely associate and bargain collectively, without risking reprisals. In situations where the right to freedom of association is restricted by law, suppliers are expected to facilitate and not prevent alternative mechanisms for free and independent organisation and bargaining.

Wages and benefits

The supplier is to pay all workers at least minimum wage. All employment conditions, total wage, working hours, vacation time, leave periods and holidays are to be consistent with applicable laws, regulations and mandatory industry standards.

Forced labour

The supplier must not use forced, bonded, indentured or involuntary labour. All work must be voluntary, and employees must be free to leave work or terminate employment with reasonable notice. The supplier must not withhold wages, identity documentation or work permits as a condition of employment, neither are they to restrict the employee's right to move freely.

Child labour and young workers

The supplier must not employ children who are younger than

the legal minimum age for employment or the age for completing compulsory education in that country, whichever is highest. The supplier must also not allow any young workers under the age of 18 to perform work that is likely to be dangerous or harmful to their health and safety.

Non-discrimination

The supplier must counteract and act against all forms of psychological, physical, and sexual abuse, threats or harassment. The supplier must not practice any form of discrimination in their hiring and employment relationships, regardless of gender, gender identity or expression, ethnicity, religion or belief, disability, sexual orientation, or age. This also applies to the right to education, promotion and rewards. The supplier shall promote inclusion, accountability, equal treatment and gender equality.

Health and safety

The supplier must assess risks and ensure that workplaces and production sites are safe and healthy. Workers must be provided with proper occupational health and safety information, training and equipment as required to conduct their work in a safe and healthy manner. The supplier must also ensure adequate fire protection and that there are evacuation routes.



Environment

The supplier must take responsibility for the environmental impact and manage environmental risks responsibly. The supplier must follow the precautionary principle and choose products that are better for the environment. The supplier should measure its emissions and work to reduce emissions of greenhouse gases, waste, and other emissions to air, water and land. Efficient technology that reduces the impact on the environment as well as promote circular flows should be used to the greatest extent possible.

The supplier must use energy efficiently and choose fossil-free energy sources. The supplier should also investigate how climate change may affect its business, adapt to these changes, and work to preserve biodiversity. The supplier should set clear environmental goals that are evidence-based and approved by management of the board.

Environmental protection

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 limit their impact over time. The supplier must also ensure compliance with product-related requirements and may be required to declare the material content and origin of products. If the supplier handles chemicals, applicable chemical legislation must be followed.



Business ethics and business integrity

The supplier must conduct its business in compliance with internationally agreed standards, rules and regulations on business ethics. Responsible business means preventing and prohibiting bribery and corruption, mitigating conflicts of interest, promoting free competition and complying with applicable laws and regulations in the countries where it operates. AI must be used responsibly and must not infringe on this code.

Anti-corruption and bribery

The supplier must work to prevent all forms of corruption. The supplier must not participate in, accept or overlook 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. The supplier must also work against enabling direct and indirect economic crimes, including money laundering, fraud, extortion and financing of terrorism, both within its own business and throughout the value chain.

Conflicts of interest

The supplier must avoid situations where there is a risk of conflicts of interest that could harm Länsförsäkringar's credibility or trust. If the supplier identifies a conflict of interest, it is the supplier's responsibility to immediately report it to Länsförsäkringar.

If the supplier provides consulting services, the supplier is responsible for conducting and approving background checks, conflicts of interest checks, and checks regarding secondary employment for consultants working for Länsförsäkringar.

Protection of rights and information

The supplier must systematically ensure information and cybersecurity in all handling of Länsförsäkringar's information. This includes protecting all information, electronic data, intellectual property and technologies and standards that Länsförsäkringar grants them access to. If the supplier collects, processes, or stores personal data about employees or other individuals, the supplier must respect their privacy and comply with applicable data protection laws.

The supplier must not disclose confidential information and may only use the information according to the contract or according to law. The supplier must protect information against misuse, theft, fraud or unauthorized 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, in violation of applicable laws and regulations, engage in anti-competitive cooperation or actions that prevent, limit or distort competition.



Sanctions and export control

The supplier may not be subject to sanctions or conduct business in countries or with parties covered by export control or sanctions applicable to Länsförsäkringar.

Whistle-blowing

The supplier is expected to immediately report suspected irregularities within the company, or in collaboration with other parties, to Länsförsäkringar. Through Länsförsäkringar's whistle-blowing system, the supplier can safely and anonymously report behaviors considered irresponsible or illegal in the relationship with Länsförsäkringar or within the suppliers own operation. The supplier can access Länsförsäkringar whistle-blowing system on Länsförsäkringar's website.

Brand name

The supplier may not use Länsförsäkringar's business name, distinguishing features, brands, or other assets controlled by Länsförsäkringar without prior written agreement with Länsförsäkringar.

Control systems

The supplier must have governance, processes and controls to ensure compliance with the standards in this code or equivalent standards. The supplier's systems and controls must also apply to their direct sub-suppliers. The supplier must promptly inform Länsförsäkringar of existing or suspected material breaches of the code that is known to them.

Consequences in case of breaches

The supplier shall promptly address any breach of this code that comes to their knowledge and take proper actions to correct and prevent them. In the event of repeated material breaches or failure to address them accordingly, Länsförsäkringar is entitled to terminate the agreement with immediate effect.

Monitoring and amendments

The supplier must provide Länsförsäkringar with all necessary information for follow-up to verify compliance with this code

upon request. This also includes random checks, dialogue meetings, and site visits at relevant workplaces and premises. The supplier must ensure that employees, consultants, and sub-suppliers involved in deliveries to Länsförsäkringar are informed and trained on this code and its requirements.

The supplier shall, unless otherwise agreed, always ensure that the latest applicable version of this code is followed and enforced.



Appendix

REFERENCES TO INTERNATIONAL STANDARDS

The UN Global Compact's ten principles

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, environmental sustainability and anti-corruption.

HUMAN RIGHTS

- Principle 1** Support and respect the protection of internationally proclaimed human rights.
- Principle 2** Make sure that they are not complicit in human rights abuses.

LABOUR

- Principle 3** Uphold the freedom of association and recognise the right to collective bargaining.
- Principle 4** The elimination of all forms of forced and compulsory labour.
- Principle 5** The effective abolition of child labour.
- Principle 6** The elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

- Principle 7** Support a precautionary approach to environmental challenges.
- Principle 8** Undertake initiatives to promote greater environmental responsibility.
- Principle 9** Encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

- Principle 10** Work against corruption in all its forms, including extortion and bribery.

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
- Implementation of the UN "Protect, Respect and Remedy" Framework

OECD Guidelines for Multinational Enterprises

The OECD Guidelines for Multinational Enterprises are joint recommendations from the governments of the OECD countries for multinational enterprises regarding responsible business conduct. The Guidelines encompass, for example, human rights, labour, environmental protection, and prevention of bribes.

Guiding principles on Business and Human Rights: Implementing the United Nations

The United Nations Human Rights Council implemented the Guiding Principles on Business and Human Rights in 2011. These principles form a framework consisting of three main parts:

- The state duty to protect individuals against human rights abuse by third parties, including business enterprises.
- The corporate responsibility to respect human rights.
- Access to remedy for individuals affected by human rights abuse.

The principles emphasise the importance for business enterprises to identify, manage and report their effect on human rights. According to these principles, business enterprises must, among other things, implement a policy on human rights as well as assess their actual and potential effect on human rights.



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