Table of Contents

Introduction ..........................................................................................3
Human rights and working conditions .............................................3
Environment ..........................................................................................3
Ethics and business integrity ............................................................4
Compliance and commitment .............................................................4
Reference to international standards ...............................................5
Contact ...................................................................................................5
**Code of Conduct for Suppliers**

**Introduction**
Länsförsäkringar’s business model is based on a long-term approach since sustainability is not a strategy but a natural part of the operations. The sustainability work is based on the vision “Together we create security” and to generate greater value for our customers in the insurance, banking and pensions offering.

Länsförsäkringar’s business operations are based on high ethical standards. Fair competition in accordance with applicable laws are essential for business operations. Länsförsäkringar AB considers collaboration with its suppliers as an integral part of its success and therefore strives to work in close co-operation with the suppliers. The selection of suppliers is based not only on the quality and competitiveness of their products and services, but also their adherence to social, ethical and environmental principles.

This Code of Conduct for Suppliers is based on the UN Global Compact and defines Länsförsäkringar’s basic requirements in the area of human rights and working conditions, the environment and business integrity. We expect our suppliers and sub-contractors to adhere to the principles described in this Code of Conduct for Suppliers in their own business or have at least equivalent standards adopted and conduct their business in accordance therewith.

Länsförsäkringar will continuously monitor our suppliers’ compliance with the standards set out in this Code of Conduct for Suppliers by asking the suppliers to provide relevant information and by conducting supplier audits and reviews.

**Human rights and working conditions**
Länsförsäkringar expects its suppliers to support and protect human rights both in the workplace and more broadly in all their business activities. All employees and workers are to be treated fairly, with dignity and respect.

**Freedom of association and collective bargaining**
Suppliers shall recognize and respect the rights of employees to freely associate, organize and bargain collectively. In situations where the right to freedom of association and collective bargaining are restricted under law, suppliers shall allow workers to freely elect their own representatives.

**Wages and benefits**
Suppliers shall pay all workers at least the minimum total wage required by applicable laws and regulations and provide all legally mandated benefits. All employment conditions, including compensations, working hours, vacation time, leave periods and holidays must be consistent with applicable laws and regulations, especially mandatory industry standards. Employees with the same qualifications, experience and performance should be equally remunerated.

**Forced labour**
Suppliers shall prohibit any use of forced, bonded, indentured labour or involuntary prison 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**
Suppliers shall work against all forms of child labour. Suppliers may not employ children below the minimum age of employment or the age for completing compulsory education in that country, whichever is higher. Suppliers must not employ any young workers under the age of 18 to perform any work that is likely to be hazardous or harmful to their health and safety.

**Non-discrimination**
Suppliers shall not practice any form of discrimination in hiring and employment practices including access to training, promotions and rewards on the grounds of sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age.

**Health and safety**
Suppliers shall ensure safe and healthy working conditions and workplace or any other location where production or work is undertaken. Appropriate health and safety information, training, risk assessment and equipment shall be provided to all workers.

**Environment**
Suppliers shall manage their operations responsibly in relation to environmental risks and impacts and adopt a precautionary approach in their business operations. Resources such as water and energy shall be used efficiently.

**Environmental legislation**
Suppliers must obtain and maintain all required permits and licenses and comply with the operational and reporting requirements of such permits and licenses.

**Environmental management systems**
Suppliers whose activities have an adverse environmental impact shall have a structured and systematic approach to take environmental aspects into account that includes establishing suitable management systems for environmental protection, setting targets and performing follow-ups. The supplier must ensure compliance with product-related requirements and may be required to declare the material content and origin of products delivered to Länsförsäkringar.
Suppliers shall endeavor to avoid or reduce any waste and emissions to air, water and soil as a result of their business activities. Efficient technologies should be used which aim to reduce the environmental impact as much as possible.

**Ethics and business integrity**
Suppliers shall conduct their business in compliance with legal requirements and to adhere to internationally agreed standards of business ethics.

**Legal compliance**
Suppliers must comply with all applicable laws, rules and regulations in the countries where they carry out their business activities. In particular the supplier shall abide by all applicable regulations aiming at preventing, detecting and remedying economic crime and, in particular, fraud, extortion, money laundering and other related crimes.

**Anti-corruption**
Suppliers shall work against all forms of corruption. The supplier must not engage in or tolerate any form of corruption, bribery, extortion or embezzlement. Suppliers must not offer or accept any benefits or other means 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.

**Conflict of interest**
Suppliers shall avoid conflicts of interest that may compromise the supplier’s credibility within the Länsförsäkringar Group or other exterior parties’ confidence in the Länsförsäkringar Group.

**Protection of rights and information**
Suppliers must protect all Länsförsäkringar information, electronic data and intellectual property and Länsförsäkringar technologies and standards with appropriate safeguards. Suppliers shall comply with its obligations to not disclose the confidential information, to not use the information except as permitted by the agreement or by law and protect the information by safeguarding it against misuse, theft, fraud or improper disclosure.

**Fair competition**
Suppliers are expected to compete as forcefully and constructively as possible while at all times complying with international and national competition laws and regulations regarding fair competition.

**Brand name**
Suppliers shall not use the Länsförsäkringar name, or any resources controlled by Länsförsäkringar, to promote the interests of their own or other parties unless formally agreed on and signed with Länsförsäkringar.

**Compliance and commitment**
Länsförsäkringar expects that its suppliers, at all times, comply with and show their commitment to the principles defined herein by establishing suitable monitoring systems and by following-up in case they receive knowledge about any violations.

**Monitoring system**
Suppliers shall have adequate systems and controls in place to ensure compliance with these standards or equivalent standards. Suppliers’ systems and controls shall also apply to the sub-contractors and suppliers they work with which are directly or indirectly connected with providing goods and services to Länsförsäkringar.

**Consequences in case of violations**
Suppliers shall address any violations to this Code of Conduct for Suppliers that come to their knowledge and take proper actions to promptly correct them. Depending on the severity of the violation appropriate actions could be a request for corrective measures but also the termination of the cooperation with any employee, affiliate, sub-contractor and agent who mandated, facilitated or applied unacceptable methods. In the event of material breach Länsförsäkringar is entitled to terminate the agreement with an immediate effect.

**Communication and auditing**
Suppliers shall provide Länsförsäkringar with all necessary information and allow Länsförsäkringar or its representatives with an access to the relevant premises and documentation in order to verify compliance with this Code of Conduct for Suppliers at least once a year to Länsförsäkringar.

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

**Reference to international standards**
**UN Global Compact**
UN Global Compact is one of the world’s larger corporate sustainability initiatives. It calls companies to align strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals.

**Human rights**
- **Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and
- **Principle 2:** make sure they are not complicit in human rights abuses.

**Labour**
- **Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- **Principle 4:** the elimination of all forms of forced and compulsory labor;
- **Principle 5:** the effective abolition of child labor; and
- **Principle 6:** the elimination of discrimination in respect of employment and occupation.

**Environment**
- **Principle 7:** Businesses should support a precautionary approach to environmental challenges;
- **Principle 8:** undertake initiatives to promote greater environmental responsibility; and
- **Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

**Anti-corruption**
- **Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.
References
In preparing this code of conduct for suppliers the following references were consulted:

• UN Global Compact, www.unglobalcompact.org
• International Labour Organization, specifically the documents listed below: www.ilo.org
• 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 http://www.un.org/sustainabledevelopment/
• UN Framework Convention on Climate Change, Kyoto Protocol http://unfccc.int/kyoto_protocol/items/2830.php
• Children’s Rights and Business Principles http://childrenandbusiness.org/
• Social Accountability 8000 www.sa-intl.org/
• UN Convention against Corruption www.unodc.org/unodc/en/treaties/CAC/index.html
Information

Contact
Procurement Länsförsäkringar AB

Author/Issuing Department
Compliance Länsförsäkringar AB

Date of publication/Latest review date
March 15, 2019