



Swedavia
Airports

Code of Conduct for suppliers



Only together will we achieve our goals

Swedavia's Code of Conduct for suppliers is fundamental to the successful, long-term collaboration between we who work at Swedavia and our suppliers, where consensus on the issues highlighted in this Code of Conduct constitutes a basic requirement. We, together with our suppliers, are responsible for ensuring that the environmental, social and labour law requirements that we set are actually complied with.

We at Swedavia are convinced that a corporate culture built on ethical guidelines also provides the basis for creating satisfied workers. As a result, this Code of Conduct for suppliers is also an important tool that supports employees – no matter whether they are employees of Swedavia or one of Swedavia's suppliers.

Only together can we achieve our goals.



A handwritten signature in black ink, appearing to read 'Jonas Abrahamsson'.

Jonas Abrahamsson
President and CEO

Swedavia's Code of Conduct for suppliers reflects Swedavia's ethical guidelines, which complement and develop Swedavia's Group-wide values (reliable, engaged, innovative and welcoming) and ethical approach. It is clearly rooted in Swedavia's vision—Together we bring the world closer—which frames how we at Swedavia should act to meet the requirements placed on our operations in a way that we are proud of.

Swedavia's Code of Conduct for suppliers

Swedavia is a State-owned group that owns, operates and develops airports all across Sweden. Swedavia complies with the requirements that the Swedish State's ownership policy places on corporate social responsibility and sustainability reporting. This means that we shall be a sustainable State-owned company, and this in turn affects how we place requirements on the supplier chain.

We at Swedavia support and run our operations in accordance with the ten principles for responsible business in the UN Global Compact. These principles are based on the UN Declaration of Human Rights, the International Labour Organization's Fundamental Convention on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the UN Convention against Corruption.

As a supplier or sub-supplier to Swedavia, it is important that you are familiar with the principles adopted under the framework for this Code of Conduct and exercise them in the duties you carry out on our behalf or in collaboration with us.

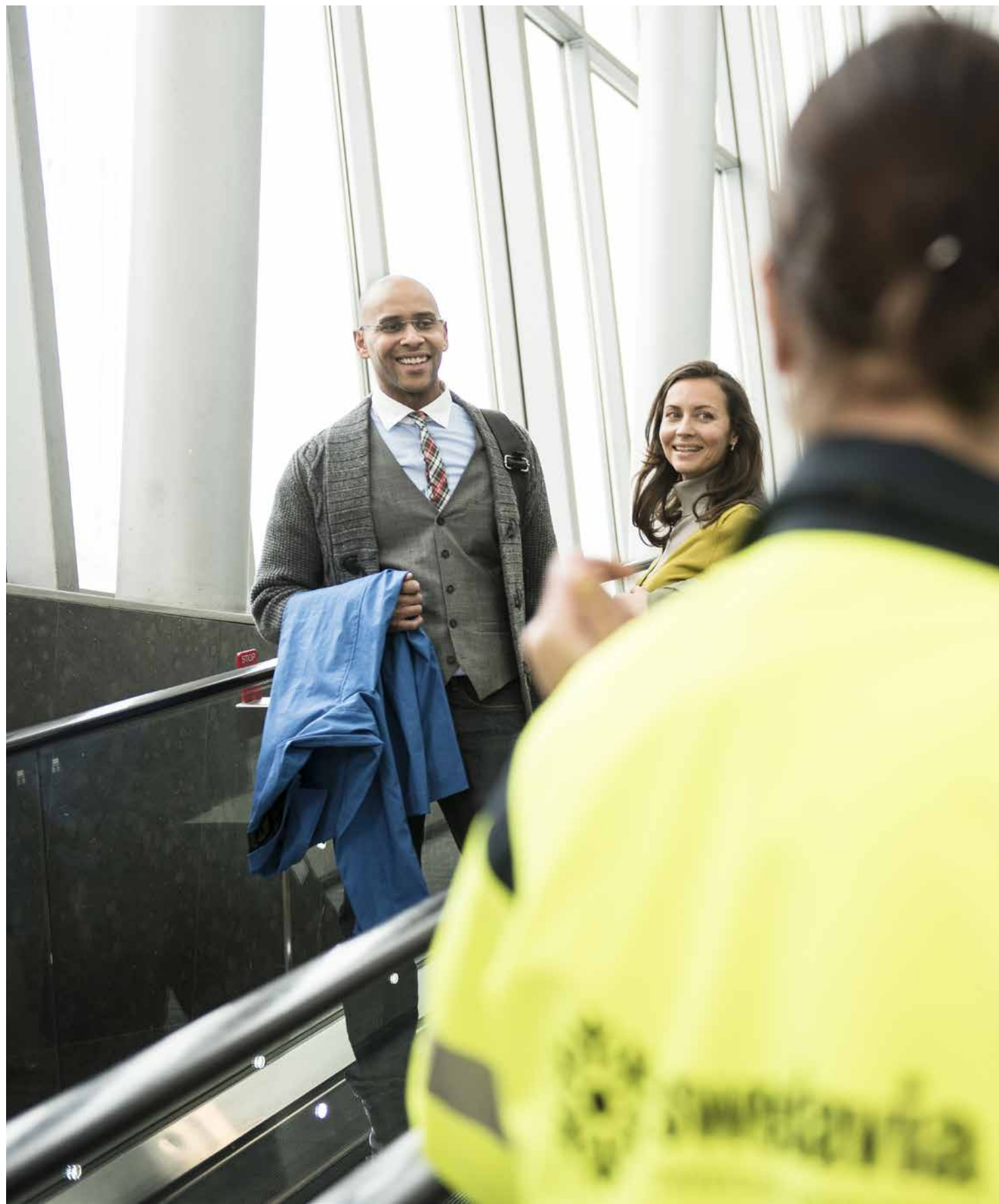


Scope of the Code of Conduct for Swedavia's suppliers

Swedavia's Code of Conduct for suppliers is aimed at everyone who in one way or another carries out work for Swedavia. It is the supplier's responsibility to be informed about this Code of Conduct and make these guidelines known in that organisation.

There is a special Code of Conduct for Swedavia's employees which largely serves as the basis for Swedavia's Code of Conduct for suppliers.

On the next page is a description of the terms for the different stakeholders described in this Code of Conduct.



Supplier

A supplier is defined as a company that carry out duties on behalf of Swedavia. The term also includes any sub-suppliers (subcontractors) to Swedavia's suppliers.

Employee

An employee is defined as someone who carries out duties and works for Swedavia. Employee is an umbrella term that includes people employed by Swedavia as well as people who are employed by a supplier/sub-supplier to Swedavia (for instance, as a consultant or in technical and other services).

For Swedavia's customers, it is not always clear who is an employee of Swedavia or of one of Swedavia's suppliers. However, this shall not affect how the customer is treated; rather, the same conditions described in Swedavia's Code of Conduct shall apply no matter who the employee's employer is. We therefore expect the approach that Swedavia describes in this Code of Conduct to apply to our own employees as well as to our suppliers' employees when they carry out duties for Swedavia.

Customers

Swedavia's customers fall into three categories – passengers, airlines and tenants. These three groups are provided with services and solutions in different ways and encounter Swedavia's employees as well as employees of Swedavia's suppliers.

It is important to Swedavia that our customers always feel welcome at our airports, regardless of the reason for their visit. Our airports are a hub for people, goods and services. Swedavia's suppliers have an important role here in contributing to the customer experience.

We at Swedavia want all of our customers to feel our sense of engagement and that we care. We do this by offering services and solutions that make the customer's situation easier, no matter which customer group is involved.

We at Swedavia want our customers to experience Swedavia as a reliable company. Swedavia's services and products shall be characterised by a high customer value.



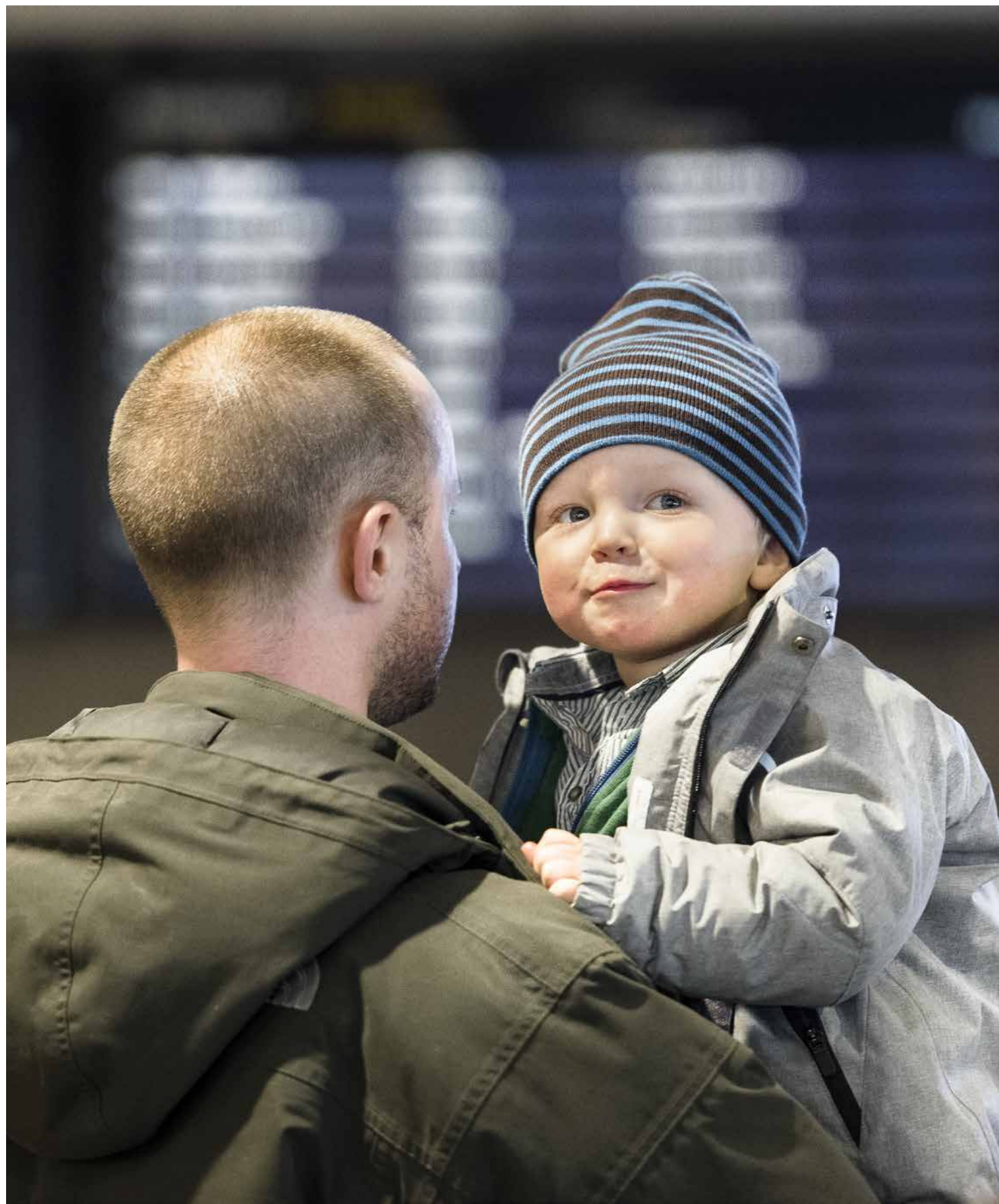
Human rights

Swedavia supports the UN International Declaration of Human Rights and associated conventions. That means we respect personal dignity, integrity and the rights of every person we come in contact with in our work. No one should participate in violating or circumventing human rights.

Swedavia regards it as fundamental that all people are of equal worth. Everyone, regardless of age, gender, skin colour, national or ethnic origin, disability, sexual preference, religion, political opinion or social status, shall be treated without being discriminated against and be given the same opportunities. All Swedavia employees are free to join any association or other organisation.

Swedavia believes in development and innovation. Employees from a variety of backgrounds provide us with both human and business advantages. Accordingly, Swedavia's goal is for the diversity of our society to be reflected in all areas of our business and at all levels of decision-making. We are convinced that diversity contributes to increased creativity and drives development forward, thus making the Group more competitive and attractive.

Swedavia's relations with others and with one another should be imbued by mutual respect and a humane approach. Everyone can expect to be treated as the person that he or she is. No one should be discriminated against or harassed in any way, for any reason or in any context. Everyone should feel welcome in our company.



Environment

Environmental awareness is an integral part in ensuring that Swedavia's business will be developed in a sustainable way. We work continuously to minimise our own environmental impact, and today we are a world leader in reducing the environmental impact linked to airports. As a supplier to Swedavia, you are expected to contribute to this environmental work and work proactively to ensure compliance with Swedavia's environmental policy.

All employees must be familiar with and obtain information about legal requirements, environmental aspects and environmental risks that are relevant to their own duties. All employees have a personal responsibility in their day-to-day work for our shared environment.

The supplier shall monitor its environmental impact in a systematic way. Limiting our environmental impact has highest priority. The supplier is also expected to use resources efficiently and minimise discharges to soil and water. Chemical products must be handled in a responsible way and be replaced with more environmentally adapted products when such alternatives exist. The environmental impact of waste must be reduced – first by preventing the generation of waste, second by recycling products, and third by using recycled materials and energy.



Working environment

The health and safety of our employees is also a top priority in all of our business operations and projects; we also expect our suppliers to give this priority. Safety concerns apply to all forms of the working environment – no employee shall risk physical injury or psychological harm at their workplace.

Swedavia is a contracting authority and unit, and we ensure that requirements involving social and labour law obligations are always taken into account in our procurement process.

For us at Swedavia, it is self-evident that we comply with and respect labour rights regulated in laws and agreements that apply in Sweden, and we expect the same of our suppliers, who in turn are expected to ensure that any sub-suppliers comply with them.

All employees shall be familiar with and obtain information about legal requirements and other legal matters that concern their own duties. All employees have, and take, personal responsibility for our shared working environment, health and safety.

All employees shall have information about the risks involved in their work, access to personal protection equipment when this is required, and training in how equipment is properly handled. Vehicles, machinery and other equipment shall be properly maintained and safe to use so that the risk of injury and damage to people's health is minimised. Together we collaborate and strive for continuous improvement to prevent all types of injuries.



Responsible business methods

Swedavia wants to be a reliable business partner with long-term business relations. We at Swedavia want to discharge the obligations we have assumed, and here we also depend on our suppliers having the same attitude.

Swedavia's business decisions are based on objective grounds and criteria. We always comply with the safety and environmental requirements that have been established. We respect and comply with competition regulations, labour market regulations, agreements, safety requirements and other statutes that provide frameworks for our operations. All business transactions are carried out in a professional manner, based on sound ethical principles and with high integrity.

As a contracting authority and unit, Swedavia must ensure that environmental, social and labour law obligations are always met in the agreements Swedavia enters into.



Policy against bribes

Swedavia's suppliers should adopt a policy with measures against unlawful influence. This policy shall be adapted to the company's size, type and ownership, the operations that are carried out and the risk of unlawful influence in the company.

It is appropriate that this policy should include a declaration that the company complies with the Swedish Anti-Corruption Institute (IMM)'s code of business conduct, the Code on Gifts, Rewards and Other Benefits, and should also include guidelines for:

- analysis of the risk of bribery, corruption and unlawful influence in the company
- what benefits the company's employees may accept for their own account and how this is reported to the company
- what benefits the company's representatives may give to employees in other companies
- limits to the value of benefits given and received
- training employees about the content and application of this policy
- who or what department is responsible for the company's policy and which of the company's employees should be contacted for advice or to submit information about suspected irregularities

- managing the risk that a partner gives benefits in violation of this code, any industry regulations that the company has adopted, rules of professional conduct or the company's own policy
- what attitude Group companies abroad shall take on issues relating to this code
- how the policy shall be implemented
- an overview of the policy
- monitoring compliance with the policy
- tools to ensure compliance with the policy in the organisation

It is the supplier's responsibility to adapt this policy to its own needs. The key issue concerning the contents of this policy is what risks the individual company faces. Therefore, in adopting a policy, special consideration should be given to identifying the risks faced by the company.



