

Code of Conduct

Our shared core values are *reliable, engaged, innovative* and *welcoming*. This Code of Conduct comprises Swedavia's ethical guidelines, which supplement and develop our values and ethical approach. It is clearly based on our purpose – *Together we enable people to meet* – and specifies how we should act in order to meet the requirements for our operations in a way that we are proud of.



Our efforts going forward need strength to be realised. So it is important to us that everyone at the company is involved. We need clear objectives and targets, a vision to strive for and tools to get us there. With a consistent approach to serving our customers and others, we have a chance to develop and achieve our goals – a journey that we all make together.

The Code of Conduct applies to all employees regardless of their job. It also applies to suppliers who carry out assignments on Swedavia's behalf or could be identified as part of Swedavia in their operations. We work to ensure that our customers and partners are familiar with Swedavia's Code of Conduct, and all leaders are responsible for making people aware of these guidelines and ensuring that they are complied with. All employees at Swedavia are always responsible for familiarising themselves with and complying with our Code of Conduct.

Swedavia is a State-owned company that owns, operates and develops airports across Sweden. International guidelines, the UN's 2030 Agenda for Sustainable Development and its global goals for sustainable development guide our operations. We 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.

It is self-evident that we comply with laws, statutes, international conventions and agreements that concern our operations.

At Swedavia, ethical conduct entails more than avoiding legal violations. At Swedavia, we are concerned about how we behave towards one another and also how we conduct ourselves in business contexts with customers, suppliers and other stakeholders. This also applies to others in the world around us. Swedavia works actively with ethical and social issues that we believe support the foundation of a modern, sustainable company.

To summarise, I see all of this as an obvious, essential requirement for us to enhance our brand so that we are a company in society that people view positively and that we as employees are proud of.

Jonas Abrahamsson,
President and CEO, Swedavia

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Swedavia's role in society

Swedavia has a clear task and an important role in Sweden's development. We shall make air travel and cargo transport as accessible, efficient and attractive as possible, and thus create the access that Sweden needs to facilitate travel, business and meetings. In this way, we help to enhance Swedish competitiveness and promote growth in an increasingly globalised world.

For us, it is self-evident that all laws are complied with in a responsible and engaged manner. And since our operations affect our surroundings in many ways, it is important that we think and act as "a good neighbour". This means, for example, that we always are interested in listening, conducting a dialogue and working together with those affected or who somehow have an interest in our operations – no matter whether this involves individuals, companies or government authorities. We make sure that our stakeholders have access to relevant information in as early a stage as possible and that we actively contribute to a constructive dialogue. In that way, we create opportunities for our airports to develop in mutual understanding with those around us.

We ensure the communication of accurate information to our shareholder, significant ownership influence and effective work by Swedavia's executive management and Board of Directors. We also have internal control functions with stringent rules and principles for the reporting of financial information that we respect and comply with.



Our customers

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. They create opportunities for meetings between people, the development of companies and the exchange of culture and knowledge. We have three customer groups – passengers, airlines and tenants – which all have different needs and desires, both as a group and as individual customers. Our work with customer journeys and improving them based on this work is the basis for meeting these needs – in other words, working with a focus on the customer.

Our customer service shall always be guided by our values. We want our customers to feel our sense of engagement and that we care. We do this by involving customers and offering services and solutions that make the customer's situation easier, regardless of the customer group. We want them to view Swedavia as a reliable company. A reliable company or business partner will always have an easier time being accepted by customers. So it is important for us to say what we do and do what we say, and not promise solutions with more content than we can deliver.

Our services and products shall be characterised by a high customer value.



Business ethics at Swedavia

The framework for Swedavia's business ethics consists, naturally, of the laws and statutes that the company must comply with – but it is also important to us that we set higher demands on ourselves and our suppliers than are legally required.

The core principle for us is to work together with one another and with our suppliers, partners and customers in an ethical manner and always safeguard sound business ethics. In Swedavia's annual and sustainability report, there are four areas which together constitute what is known as our Sustainability Report. At Swedavia, we have decided that good business ethics at Swedavia consist of us maintaining proper conduct in the four areas outlined in our sustainability report: Anti-corruption, Human Rights, Employees and Social Relations, and Environment.

So it is especially important for us at Swedavia to work with these areas in order to be a modern, reliable and sustainable company. We take it for granted that our suppliers, partners and customers will also safeguard and work with these issues.

There is continuous monitoring of how we work in these areas, with the results also reported in our Annual Sustainability Report. By working actively and in a structured way with these areas, we thus also integrate the Sustainability Report in Swedavia's business ethics and in our Code of Conduct.

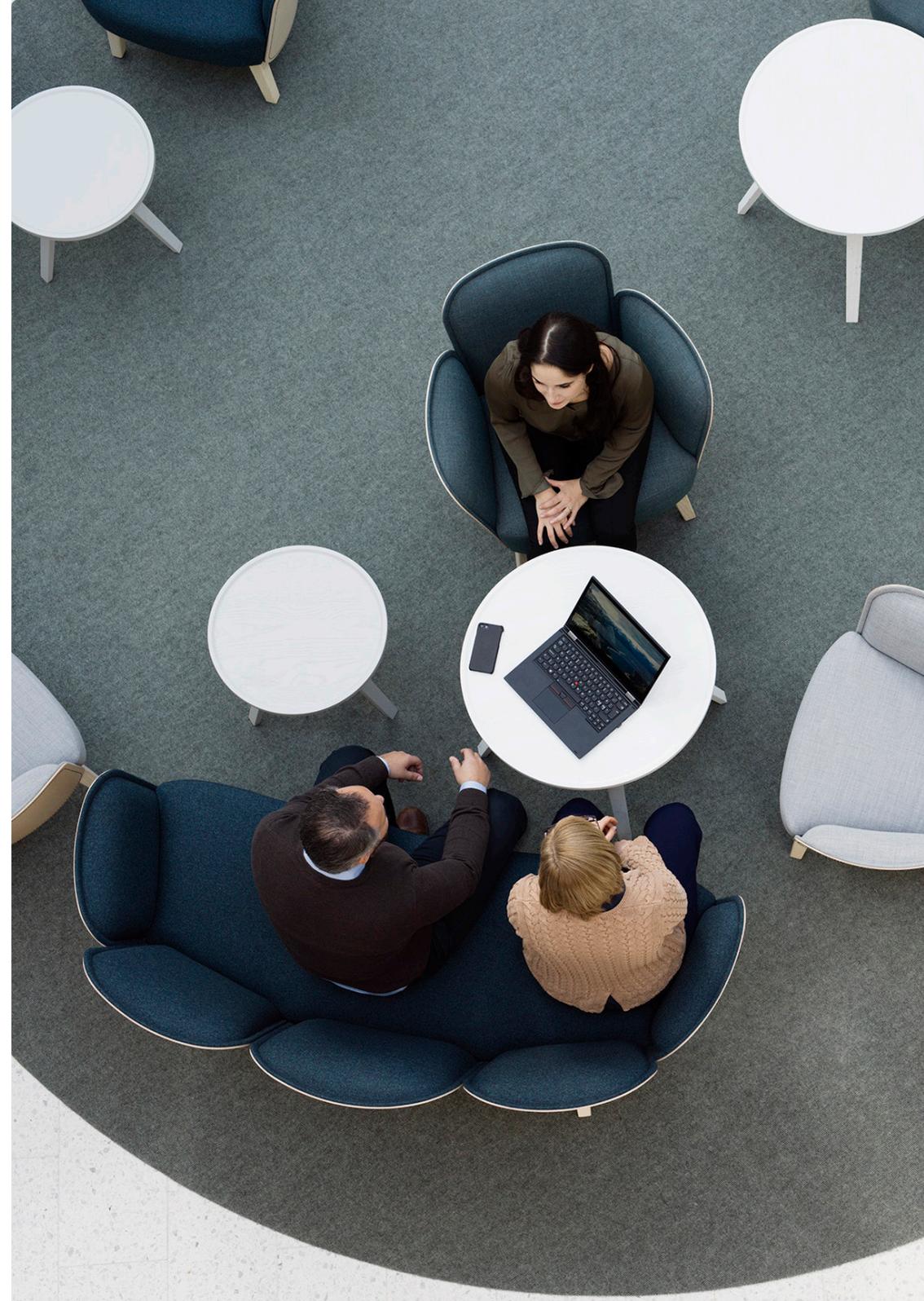
Business ethics at Swedavia

Our business ethics constitute our internal moral compass and are reflected in our continuous work with anti-corruption, human rights, employees and social relations and the environment. For each of these four areas, we work according to the process outlined below.

We carry out a comprehensive risk analysis together with the Risk Manager at Swedavia and also prepare measures to mitigate risks. We make sure that we have clear governing documents that are reviewed and updated each year. We conduct training for employees at Swedavia and offer training to our suppliers. We work with advice services, make sure we maintain an active dialogue within the company and create opportunities for follow-up.



Our goal is for all employees at Swedavia to be trained in the four areas and be part of our dialogue on these issues. So it is also important that we highlight each of the four areas in our Code of Conduct.



Anti-corruption

Swedavia wants to be a trustworthy business partner that maintains long-term business relations. Honesty and openness are thus integral to the interaction and relations with our business partners, and we honour the commitments we have made. Our business partners should feel that these are important conditions to ensure that the business we conduct together will be as successful as possible.

Swedavia's business decisions in every case are based on objective grounds and criteria. We always comply with the safety and environmental requirements established. We respect and comply with laws, agreements, safety requirements and other statutes that provide the framework for our operations. All business transactions are made based on professionalism, sound ethical principles and a high level of integrity, and we also expect this of our suppliers.

We are well aware that things which are not prohibited can still be inappropriate. So it is important that we maintain a good dialogue within the company. If there are any doubts, you can always ask for advice from your immediate supervisor, but in the end you are the one who bears responsibility.

Our Code of Conduct is one of the governing documents in our work with anti-corruption. Swedavia has also adopted a specific Bribery Policy, another governing document that everyone at Swedavia must comply with. The Bribery Policy also specifies that Swedavia's employees must comply with the Swedish Anti-Corruption Institute's Code on Gifts, Rewards and Other Benefits (the Code of Business Conduct). Both of these documents include detailed guidelines on how we should conduct ourselves with external contacts as employees of Swedavia. Swedavia also supports the Swedish Joint Initiative to Prevent Bribery and Corruption between suppliers and clients in the publicly funded construction and real estate sector. For employees at Swedavia that work with the construction and real estate sector, this provides additional practical help to do the right thing with examples and ethical guidelines. All of these documents are available on Swedavia's intranet.



Corruption and inappropriate influence

Swedavia vigorously opposes all kinds of corruption. You may never offer or receive benefits or rewards that could be interpreted in any way as business or personal perquisites for you or others. Nor may you reach agreements with intermediaries to make payment to someone in a way that could be interpreted as corruption.

Swedavia also opposes any kind of attempt by suppliers and partners to exert an inappropriate influence on our leaders and employees. No employee or leader may accept any type of remuneration that can be seen as corruption or bribery. We also refrain from acts that can be seen as attempts to exert inappropriate influence on the recipient's decision.

Gifts and business entertainment

All business entertainment is in accordance with established business practice and the laws that apply in the markets we work in. We always carefully consider and are very restrictive about offering or receiving gifts and/or trips or allowing ourselves to accept business entertainment. Ask your immediate supervisor for advice when you are uncertain and get support from the guidelines mentioned above. However, you bear responsibility for the decision you make.

Private interests, conflicts of interest and agreements with related parties

Swedavia's employees may not take advantage of business opportunities, either for themselves or for the benefit of people close to them, that actually belong to Swedavia. It is also self-evident that the employees cannot use information, property or their position for personal gain. People who are involved, directly or indirectly, in contacts with tenderers, suppliers or customers may not have private business or transactions with them. Every employee must refrain from situations in which personal interests could be in conflict with Swedavia's best interests.

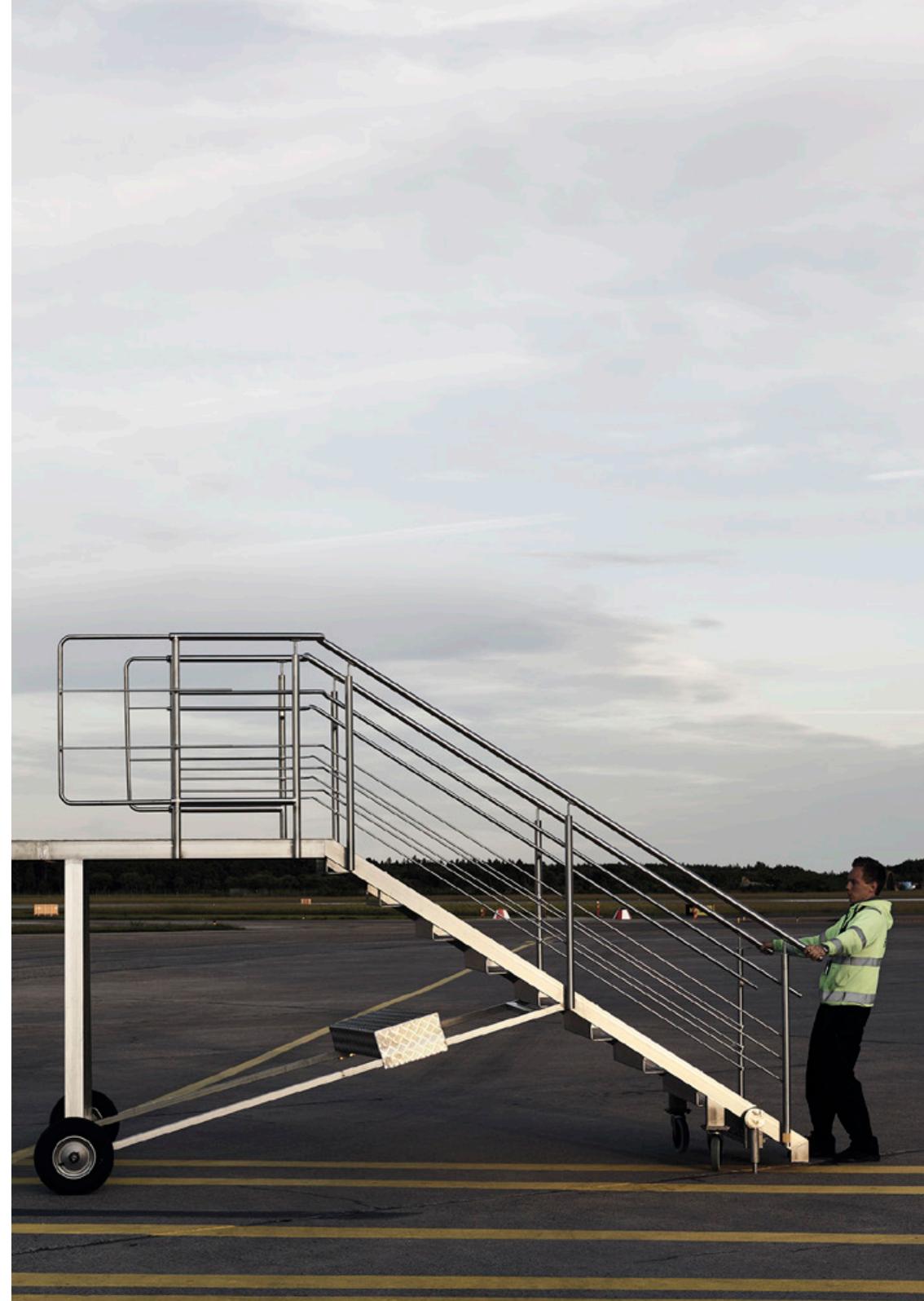


Side-line activities, other assignments or involvement in external operations

Engagement through various side-line activities is considered to be something positive. However, this may not affect work in a negative way or conflict with Swedavia's business interests. As an employee at Swedavia, obviously you may not have another job or carry out other work when you work at Swedavia without getting written approval in advance from your immediate supervisor. The same holds for Board duties and the giving of advice to – or through the ownership of – customers, suppliers, partners or competing operations.

Whistleblower function

Swedavia also has a whistleblower function that gives all employees at Swedavia – as well as customers, suppliers and other stakeholders connected to Swedavia – the opportunity to report their suspicion of any irregularities that could have serious consequences for Swedavia. The decision to establish a whistleblower function was decided by Swedavia's Board of Directors. To protect your anonymity, the reporting channel is provided by an external, independent party. The report channel is encrypted and protected by a password. You never have to provide your identity if you do not want to. You will find more information about this on Swedavia's intranet and on our external homepage.



Human rights

Running airports is a complex operation that could potentially affect the human rights of many different stakeholders. Swedavia supports the UN's International Declaration of Human Rights and related conventions. This means that we respect the personal dignity, integrity and rights of every person we come into contact with in our work.

Swedavia's fundamental assumption is that all people are of equal value. All people receive equal treatment and equal opportunities, regardless of their age, gender, transgender identity or expression, ethnic identity, religion or other belief, functional impairment, sexual preference, political conviction or social status.

All of Swedavia's employees are free to join any association or organisation.

Swedavia believes in development and new ways of thinking. Employees from a variety of backgrounds provide us with human resources and business benefits. So Swedavia's objective is for all areas of operations and levels of decision-making to reflect the diversity in our society. We are convinced that diversity, gender equality and an inclusive culture contribute to increased creativity and our ability to develop and thus to the company's competitiveness and attractiveness.

Our relation to one another is characterised by mutual respect and a shared sense of humanity. Each and everyone of us can expect to be respected for who we are. No one is discriminated against or harassed in any way, for any reason or in any context. Everyone should feel welcome at Swedavia.

As a company that takes responsibility, Swedavia carries out continuous work to proactively identify and manage risks associated with human rights throughout the value chain. We expect our suppliers to affirm that they respect and support internationally recognised human rights and take measures to avoid causing, contributing to or being associated with negative effects on human rights.



Our employees are Swedavia's most valuable asset. It is through our employees' engagement, reliability, motivation and competence that we create the atmosphere that employees and customers feel good in. Our employees enable operations to develop, and it is through them that Swedavia can make a difference.

Every employee is an ambassador who acts in accordance with our values, so that trust in Swedavia is strengthened. This is also true outside business hours when we meet other people. We are especially aware of this when we represent Swedavia in different forums and contexts, when we wear clothes or travel in vehicles that feature Swedavia's logo. This is also true when we act in digital environments, for instance, we take part in social media, write e-mails, visit websites etc.

Confidentiality

All employees at Swedavia familiarise themselves with the content of Swedavia's confidentiality policy in conjunction with the signing of their employment agreement. We never comment on or provide data that can provide outsiders with access to sensitive information. We are cautious when we discuss internal business or anything else that concerns Swedavia to prevent outsiders from overhearing by mistake. This confidentiality also remains in effect once a person's employment has ended or their agreement with Swedavia has expired.

Tangible assets

Swedavia has a large number of physical facilities in our operations. Our goal is to give every employee the tools they need, in the form of equipment and information required in their daily work. We safeguard these assets to prevent unnecessary wear and tear, damage and other losses. Equipment and other assets may not be used for the personal benefit of employees.

Employees and social relations

Intangible assets

Intangible assets are important for Swedavia's operations and results. These can include special know-how, methods, concepts and ideas that we have developed and use in carrying out our professional duties. We also protect and manage these assets in Swedavia's interest. We likewise respect the intangible assets of others and shall not infringe such rights. Unless otherwise specified in laws or decisions by government agencies, we shall not make company secrets or other important information concerning Swedavia available to unauthorised persons before we have had a confidentiality agreement signed by each such individual. Intangible assets can quickly be spread and made available online through indiscreet formulations, for instance via social media. So we contemplate and think about how we express ourselves in these contexts.

IT assets

Swedavia's employees have access to IT equipment via e-mail, the internet and different applications in order to have access to the information services needed in their work. We are personally responsible for this IT equipment and its use. We never give out our identity or password to anyone. Nor do we use Swedavia's IT equipment and IT services to damage Swedavia or a third party.



Information

All information that guides our operations and decisions is operational information. We handle operational information with great care. We all take part in the work to ensure that this information is accessible, accurate and usable and that the right level of authorisation governs the protection of this information. If there is suspicion of a breach, unlawful handling or other incidents concerning information, we report this in accordance with our incident reporting process.

**Protection for the
personal integrity of
personal data**

Swedavia safeguards the integrity of our customers, partners and employees, and we are careful to comply with the regulations on data protection in effect. In order to protect the rights of its citizens, the EU has introduced a new law, the General Data Protection Regulation (GDPR). GDPR entails stronger protection for people whose personal data are handled and sets additional and more stringent requirements for companies and individuals who handle such personal data. GDPR stipulates, among other things, that “the protection of natural persons when processing personal data is a basic right”. In order for Swedavia to comply with GDPR, all employees must be familiar with the regulation and comply with the internal regulations established. All employees at Swedavia thus receive training on this law, and there is information on the company’s intranet and good opportunities for internal advice and dialogue on these issues.





About the workplace environment in particular

In all operations and in the projects that Swedavia carries out, high priority is given to employee health and safety. Concern about safety applies to all forms of workplace environments – no employee, consultant or contractor in Swedavia's operations should put their health or safety at risk at their place of work. Everyone must know about or have the possibility to obtain information about legal requirements and other regulations and processes that concern their own tasks. All employees and other stakeholders in our operations are personally responsible for the shared workplace environment and people's health and safety. This responsibility also includes reporting incidents and risks to reinforce the company's work with preventive measures.

Swedavia works proactively to choose and collaborate with suppliers who share and apply Swedavia's approach to preventive work to safeguard the workplace environment.

Risks and protective measures

All employees, consultants and contractors shall have information about the risks involved in their work. Access to personal safety equipment shall be available and made use of. Training in handling and using protective equipment, vehicles and machinery is provided so that the equipment and machinery are handled properly. Maintenance and oversight ensure that the risk of injury and ill health are minimised. Together we strive for continuous improvement in the workplace environment to prevent any kind of injury.

Victimisation and harassment

Swedavia's workplaces shall be free of victimisation and harassment. Harassment, bullying or offensive behaviour is not allowed in any form. We work systematically and take a preventive approach on these issues as well as follow up on and investigate incidents that are reported.

Drugs and alcohol

Consumption of alcohol or drugs at work or that risks affecting work is not allowed in any operations and is inconsonant with Swedavia's operations.

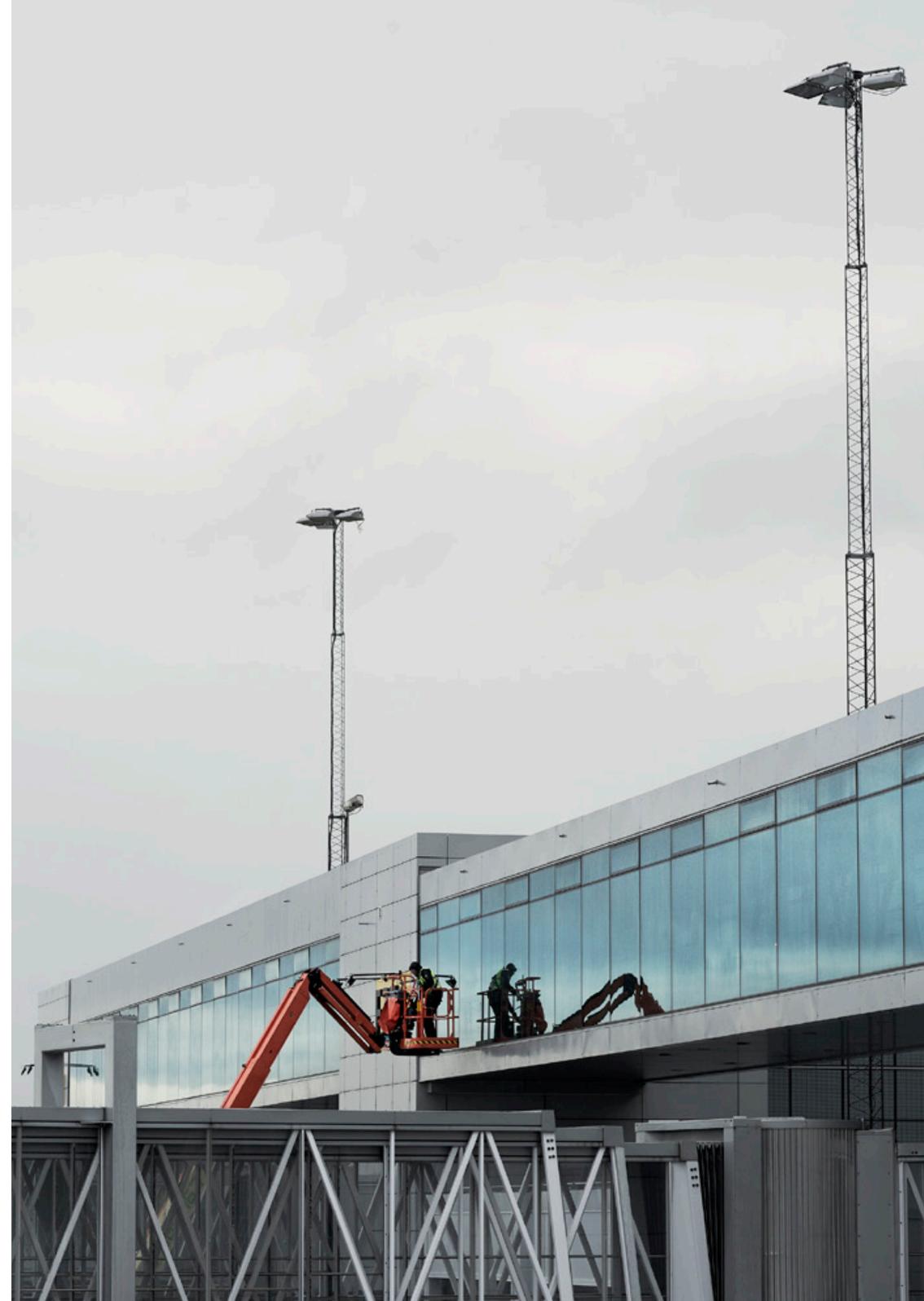
To guarantee a safe workplace environment, it is taken for granted that people are sober at work and refrain from all non-medical use of narcotic substances, anabolic steroids or mind-altering substances.

All employees and consultants take a drug test when they are first hired, and random drug tests are carried out in all operations.

Social media

Our engagement in social media spreads our message and enhances our brand. It also enhances the image of our company as open and accessible. As an employee, you are always an individual. However, your participation in social media affects not just your image but Swedavia's image. It is very important that you distinguish between when you participate in social media within the scope of your job and when you take part as a private individual. You are always personally responsible for whatever you publish on your own initiative regardless of whether it is published in your capacity as an employee or privately. Information that is to the detriment of Swedavia could constitute a violation of the employee's oath of loyalty in their employment agreement.

If you are uncertain about what you are entitled to do and what is allowed within the scope of your job, for instance, posting items that concern Swedavia, you should ask your immediate supervisor and also get support from Swedavia's guidelines concerning social media.





At Swedavia, we work actively to create a culture based on interest and engagement in how each and every one can help reduce our impact on the environment. Concern about the environment is integral to our operations and is taken into consideration in all decisions. We all obtain the knowledge needed in order to carry out our tasks in a way that reduces our environmental impact since we know that the environmental impact of air transport is of great importance to the development of air transport.

We at Swedavia all strive to reduce the negative environmental impact of our airports and help in our work in order to achieve the environmental quality goal of "limited climate impact". We are aware of how we affect the environment. This knowledge means that we can work in a preventive manner to prevent any unnecessary impact on the environment and unnecessary risks to the environment. We have systematic checks on how our operations affect the environment, and we carry out the surveys that are needed to see how we affect our surroundings. We also work to enable other companies and organisations at our airports to reduce their environmental impact.

Our objective is to reduce greenhouse gas emissions, increase the share of renewable jet fuel used and minimise energy consumption. We work to achieve resource-efficient operations and to reduce the discharge of pollutants into the soil and water. We carry out operations at our airports in a way that promotes biological diversity.



We work actively to reduce the noise load and to ensure that the exposure experienced is considered acceptable relative to the social benefits of air transport. We ensure that we handle chemicals in a responsible manner and strive to replace chemicals that are hazardous to the environment with less toxic substances. We minimise the generation of waste in a number of ways – first, by preventing the production of waste; second, by recycling products; and third, by recycling materials and the energy they contain. In the construction of new properties and the renovation of existing ones, we strive to make them energy-efficient and make sure that the materials and solutions chosen are sustainable.

One of our most important contributions to sustainable development is that we set environmental requirements and ethical requirements in the tender process for services and products. When we choose suppliers, we give priority to those that are proactive and systematic in terms of environmental and social responsibility, quality, health and safety. Suppliers must have a plan to limit their environmental impact. Suppliers are expected to have a good understanding of the life cycle perspective and the environmental impact of their own operations.





Application and follow-up

The content of this Code of Conduct only has meaning if we together succeed in applying it in our everyday lives. This includes everyone, regardless of whether we are employees, consultants or suppliers to Swedavia. In addition to reading the text, we also need to talk to one another about what it means for us and our work.

As employees at Swedavia, the Code of Conduct in effect at the time is a governing document that we sign when we are first hired. For suppliers, Swedavia's Code of Conduct is part of their agreement with us. We expect everyone to comply with this Code of Conduct.

As employees, our shared engagement and our results-focused work are an essential requirement for Swedavia's development now and in the future.

So it is of utmost importance that we both understand and follow these guidelines. These formulations are predicated on trust in everyone's good judgement and common sense. In some situations, it can be difficult to figure out which action is right or wrong. Before we act in such situations, we should therefore think hard about what the consequences of our actions are and whether we can take responsibility for the consequences. As an employee, you are responsible. As a leader, you need to understand what these guidelines mean for your area of responsibility and for Swedavia as a whole. Take our guidelines into consideration when you make your plans for operations.

As a leader, you are also responsible for providing your employees with the right conditions for complying with the requirements in this document. Regarding these matters, it is especially important that you lead by being a good role model. Your employees will see how you comply in word and deed with the formulations as well as the spirit of our Code of Conduct. Talk to your employees and make sure that they also understand and work in a way that supports them. Continue to keep this conversation about responsibility and ethics alive!

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