

Code of Conduct for Swedavia's suppliers

The Code of Conduct for Swedavia's suppliers contains Swedavia's ethical guidelines that complement and develop Swedavia's common values (reliable, committed, innovative and courteous) and ethical approach. It has a clear foundation in our vision – Together we bring the world closer – and clarifies how we should act to comply with the requirements on our business.

This *Code of Conduct for Swedavia's suppliers* applies to those who carry out assignments on behalf of Swedavia, for example, our suppliers and their subcontractors. As a supplier or subcontractor, it is your responsibility to comply with the principles established in this framework now and in the future. As a supplier, you undertake to bring this Code of Conduct to the attention to those of your staff, who perform tasks on behalf of Swedavia. The corresponding regulations apply to all of Swedavia's employees regardless of their responsibilities in the company.

Swedavia is a state-owned group that operates and develops airports across Sweden. We support and conduct our business in accordance with the ten principles for responsible business in the UN Global Compact. These principles are based on the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption.

It is self-evident that we comply with the laws, ordinances, regulations, international conventions, contracts and agreements that affect our business.

Ethics is about more than just avoiding breaches of the law and how we behave to one another. It also concerns our conduct in our business environment and the wider society. Swedavia wants to be a company that works actively with ethical and social issues. We regard this as essential for strengthening our brand and for being an actor in the community that meets a positive response.

Swedavia's role in society

Swedavia has a task to play in society – our role is to support growth and accessibility.

Together with our stakeholders, we are an important prerequisite for Sweden's prosperity and growth. We make Sweden accessible to the world and provide access within Sweden for both private and business travellers. Our role in Sweden's infrastructure enables us to bring the world closer, not just for our visitors but also for people living in Sweden who want to experience other parts of the world. Our work provides opportunities for people to meet.

Human rights

Swedavia supports the United Nations Universal Declaration of Human Rights and the associated conventions. Accordingly, we respect the dignity, integrity and rights of every person we come into 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.

Swedavia believes in development and innovation. Personnel with diverse 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.

Our 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.

Customers

It is important for Swedavia that our customers always feel that they are treated courteously. Our airports are a hub for people, business and services. They create opportunities for meetings between people, development of companies and exchange of culture and knowledge. We have three categories of customers – travellers, airlines and tenants – all with differing needs and wishes, both between and within each category.

Our treatment of passengers should always reflect our values. We want all customers to

feel that we are committed to and care about them. We do this by providing services and solutions that facilitate the customer's situation, regardless of the customer group involved. We want them to experience Swedavia as a reliable company. A reliable company or business partner will always be more readily accepted by customers. It is therefore important for us to say what we do and do what we say, and not to promise solutions that are beyond our capacity to deliver.

Our services and products shall have high customer value.

Staff

Our staff are Swedavia's most valuable asset. It is through their commitment, reliability, motivation and skills that we create a pleasant atmosphere for ourselves and our customers. It is the staff that develop our business and enable Swedavia to make a difference.

Swedavia's employees may not, neither on their own behalf nor for those close to them, benefit from commercial opportunities that rightly belong to Swedavia. It also goes without saying that they should not use information, property or their position at work for improper personal gain.

Our staff are ambassadors who act in accordance with our values to strengthen confidence in Swedavia. This also applies outside working hours in our meetings with other people. We are particularly aware of this when we represent Swedavia in various fora and contexts, when we are wearing profiled clothing or in vehicles with the Group's logotype.

We expect the employees of our subcontractors to conduct themselves in accordance with the above approach when they perform work for Swedavia.

Environment

At Swedavia we work actively to create a culture based on interest and commitment for how all of us can contribute to reducing our impact on the environment. Consideration for the environment is an integral part of all of our business activities and decisions. We all acquire the knowledge required to perform our work in a way that has the least impact on the environment.

Everyone is aware of Swedavia's environmental policy.

Objectives and goals

The environmental impact of aviation is of crucial importance for the aviation industry and thus for Swedavia. We shall therefore continuously strive to reduce the negative environmental impact of airports, mainly by reducing emissions of climate-changing gases, reducing other emissions to air and discharges to water, and keeping to a minimum the use of chemicals and waste. It is self-evident for us to comply with environmental legislation and other applicable national and international rules and demands. We shall also endeavour to reduce noise and emissions from aviation operations. To achieve this, we must work in accordance with the following strategies:

Basic rules

- Consideration for the environment shall be an integral part of all our business activities and decisions.
- The impact on the environment is the most important environmental issue for the aviation industry and shall be a priority in our decisions and activities.
- We shall continuously strive to use energy more efficiently in our business and guide the business towards a more sustainable use of resources.
- Swedavia's staff shall participate in the company's environmental work and be familiar with the relevant legislation.
- We shall assess and deal with the environmental risks of the business systematically.
- Swedavia shall participate actively in the local, regional, national and international work in order to reduce the negative environmental impact of the aviation industry and work towards sustainable development of the airports.

Monitoring

Compliance with environmental policy should be monitored, in among ways, by environmental audits, inspection procedures for important decisions and in the executive management's review of the environmental work.

Working environment

The health and safety of our staff is also a top priority in all of our business operations and projects. Safety concerns apply to all forms of working environment – no member of staff shall risk physical or mental injury at their workplace. Everyone shall know or acquire information about the legislative requirements and other legal issues affecting their own work. Everyone has and takes in their day-to-day work personal responsibility for our common working environment, health and safety.

Risks and protective measures

All staff are informed about the risks in their work and the availability of personal protective equipment, when so required. They also receive training in the correct handling of equipment. Vehicles, machinery and other equipment are correctly maintained and safe to use so as to minimise risk of injuries and ill health. Everyone concerned works together and strives for continuous improvement to prevent all types of injuries.

Threats, insulting behaviour and harassment

Workplaces shall be free of threats and insulting behaviour. Swedavia does not accept any form of discrimination neither in recruitment nor work. Bullying, insulting behaviour or harassment must not occur. We do not accept forced labour.

Drugs and alcohol

The consumption of alcohol or drugs at work or before going to work is incompatible with our business. Our ambition is to have a high level of safety and security and to prevent ill health, incidents and accidents at our workplaces. It is self-evident that our staff shall not be under the influence of alcohol and that all employees refrain from all non-medical use of narcotics-classified substances, anabolic steroids or other consciousness-changing substances.

Responsible working methods

Swedavia wants to be a credible business partner with long-term business relationships. Honesty and openness are therefore fundamental parts of our relations with our business partners. We do what we have undertaken to do. Our business partners shall feel that they are an important prerequisite for our work together to be as successful as possible.

Swedavia's business decisions are always based on objective grounds and criteria. We always comply with the safety and environmental requirements. We respect and comply with competition rules, labour market laws, contracts, security and safety requirements and other regulations that set the framework for our business activities. All business transactions are performed with a professional approach, sound ethical principles and a high level of integrity.

We are well aware that there are things that are not prohibited which are still unsuitable. If you are uncertain, you should always seek the advice of your immediate superior if you have one. However, ultimately, it is your responsibility.

Corruption and improper influence

Swedavia is opposed to all forms of corruption. You may never offer or accept gifts of money or inappropriate rewards that may in any way be interpreted as commercial or personal benefits for yourself or other people. You may not either enter into agreements with intermediaries to make payments to someone in a way that could be interpreted as corruption.

Swedavia also opposes all forms of attempted improper influence from suppliers and partners of our managers and staff. No member of staff or manager may accept any form of compensation which could be interpreted as corruption or bribery. We also refrain from actions that can be perceived as attempts to exercise improper influence on decisions made by the recipient.

Gifts and representation

All representation is in accordance with the business practice and legislation that applies to the markets we work on. We always give careful consideration to whether we can offer or accept gifts and/or travel or take part in representation. Ask your immediate superior for advice if you feel uncertain. However, you are responsible for your own decisions.

Summary

The content of this Code of Conduct is only meaningful if we succeed together in applying it in our everyday work. As well as reading the Code, we also need to talk to one another about what it means for us and our work.

Our common commitment and performance-focused work is a prerequisite for Swedavia's development now and in the future. It is of therefore of the utmost importance that we both understand and comply with these guidelines. The formulations are based on reliance on the good judgment and common sense of the individual. In some situations it may be difficult to work out what is correct or incorrect conduct. Before we act in this type of situation, we should therefore think thorough the situation carefully, the consequences that our actions may have and whether we can take responsibility for the consequences.

As a supplier, you need to understand what these guidelines mean for your assignment and for Swedavia as a whole. It is your responsibility to take these guidelines into consideration when you are performing your assignment. You have an obligation to communicate Swedavia's environmental policy to those working for you or on behalf of Swedavia. As a supplier, you are also responsible for giving your staff the right prerequisites to be able to comply with the requirements of this document. It is particularly important here that you show the way by setting a good example in what you say and do. Your staff will then see how you comply with the words and spirit of this Code of Conduct. Talk to your staff and make sure that they understand and support it. Maintain a living dialogue on responsibility and ethics.