

# Code of Ethics and Conduct

This Code of Ethics and Conduct describes the principles of behaviour and conduct that all our colleagues should aspire and adhere to. The code of ethics and conduct also provides us with practical guidance in our operations and daily business decisions. It should be regarded as a corner stone of our overall governance structure, supported by policies and principles that further detail our internal requirements and expectations.

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**Established by:** Head of Sustainability

**Owner:** The Board of Directors

**Last revised:** 2021-06-30



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## Values that unite Byggfakta Group

### Ambitious

#### Colleagues: Be Ambitious

##### Why do we value this?

- β It makes things happen
- β It motivates and inspires
- β It drives us to accomplish things and gain the best outputs

##### What isn't being ambitious around here?

- β Focusing on personal achievements or being manipulative to get desired outcomes at the expense of others
- β Sitting back and waiting for someone else to provide the solutions
- β Taking risks without giving any consideration to the potential impact

#### Board: We will reward it

##### What does it mean to be ambitious at Byggfakta?

- β Focused and motivated to achieve
- β Client focused and sales driven always
- β Going the extra mile and not being afraid to challenge ourselves
- β Enthusiastic to make a difference
- β Embracing challenges in a positive manner and enjoying working through them in the knowledge they are enabling us to learn and move things forward
- β Being open to change and putting forward solution.
- β Accepting failing is part of learning, failing fast means we learn quickly but are also quick to rectify things
- β Coaching others to be their best and empowering them to do what they do well

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### Curiosity

#### Colleagues: Be Curious

##### Why do we value this?

- β It enables both personal and organisation growth
- β It facilitates continual improvement
- β It encourages people to question and challenge

##### What isn't being curious around here?

- β An excuse to be disruptive
- β Researching endlessly and not delivering on time
- β Continuing to ask questions if a final business decision has been made
- β Identifying lots of barriers without suggesting solutions

#### Board: We will be open

##### What does it mean to be curious at Byggfakta?

- β Constructively challenging views and opinions
- β Embracing and seeking out feedback and ways to continually improve
- β Questioning why we do something in a particular way and proactively suggesting improvements
- β Being open, honest, and transparent with colleagues
- β Striving to seek out solutions and challenge ourselves
- β Asking questions to improve understanding

## Integrity

**Colleagues:** Show Integrity

**Board:** We will celebrate it

### Why do we value this?

- β Organisations known for their integrity perform better
- β Doing the right thing in a professional way, acting with humility and transparency
- β It fosters a workplace culture of open, honest and transparent communication
- β It builds trust and confidence

### What is not showing integrity around here?

- β Making decisions based on personal or team benefit without considering wider impact
- β Being outspoken and blunt without due regard for others
- β Taking a neutral position rather than contributing constructively
- β Avoiding difficult conversation.

### What does it mean to show integrity at Byggfakta?

- β Being honest with others about your achievements, challenges, and mistakes
- β Trusting and respecting colleague's thoughts and ideas
- β Treating others fairly
- β Being responsible for our actions and behaviour at all times
- β Admitting to and learning from our mistakes
- β Leading by example

## Responsibility

**Colleagues:** Take responsibility!

**Board:** We will trust you

### Why do we value this?

- β It is crucial to efficiency
- β Being accountable leads to increased capabilities with a boost to job satisfaction
- β It is about stepping up and being responsible for results and outcomes – good and not so good!

### What is not taking responsibility around here?

- β Blaming others for mistakes or failures
- β Missing deadlines
- β Avoiding challenges or tasks
- β Not taking risks
- β Engaging in self pity
- β Regularly complaining

### What does it mean to take ownership at Byggfakta?

- β Taking responsibility for the results and outcomes and not assuming the responsibility is purely the concern of management
- β Ensuring tasks are completed on time, if you can't complete it ensure you proactively seek out the solutions with the appropriate person(s) in order to complete the task.
- β Completing tasks on time to the best of your ability and keeping relevant stakeholders updated
- β When identifying issues and barriers; provide suggested solutions
- β Trust colleagues to fully own activity; ensure clear instruction is given as to what that looks like at the outset
- β Embracing the difficult tasks and making decisions

## Collaboration

### Colleagues: Be Collaborative

#### Why do we value this?

- β We recognise the value of working with others, sharing knowledge and fostering strong relationships to make informed decisions
- β Excellence is expected of us, we achieve this working together and finding the best solutions
- β We are a team working towards the same goals

#### What isn't being collaborative around here?

- β Working in silo, shying away from working with others
- β Deliberately retaining information that others could benefit from knowing
- β Only working with a narrow range of colleagues
- β Spending significant amount of time collaborating on or working on a team project that does not fit with current business priorities
- β Opportunity to vent issues with other members of the business that could have a negative impact on them or on productivity

### Board: We will support you

#### What does it mean to be collaborative at Byggfakta?

- β Proactively sharing ideas and knowledge to help colleagues find the best solutions
- β Supportive of others and sharing constructive feedback and being open to receiving feedback
- β Finding common ground and fostering strong relationships
- β Having a positive impact on others and being willing to tactfully voice the unsaid
- β Acting in an inclusive way, involving the right people and being able to separate personal feelings from business

## Our vision

Byggfakta Group, together with its subsidiaries and affiliates, is committed to establishing and following the strictest rules of ethics in the conduct of our business.

Byggfakta Group considers our reputation to be one of our most precious assets and it is of great importance to us to ensure that our subsidiaries, affiliates, directors, executives, employees, partners, service providers, consultants, agents, and representatives commit no irregularities in carrying out their functions.

It is important for Byggfakta Group to achieve our goals, but the way in which we do it is just as important. The Code of Ethics and Conduct is a fundamental component of our culture, and it is a corner stone of our overall governance structure.

In a complex environment, Byggfakta Group ensures respect for the ethical principles by which its activity is governed and undertakes to obey the laws and regulations in force in the various countries in which we operate, especially those related to environmental protection, human rights, employee relations and anti-corruption.

Byggfakta Group adheres to the principles of the Declaration of Human Rights, the International Labour Organization, and the Principles of the UN Global Compact. Also, we contribute to the UN Sustainable Development Goals.

This Code of Ethics and Conduct sets out the fundamental principles that the company feels bound to uphold to ensure its long-term expansion. It is intended to guide all employees determine the attitude to be adopted in any delicate situations they may encounter, within or outside Byggfakta Group, when carrying out their everyday tasks and responsibilities.

## Ethical codes

### Purpose

Byggfakta Group aims to create conditions and a common engagement to conduct a long-term, sustainable, profitable, and responsible business. To assist the process and create a culture that engenders these behaviours with all colleagues we have created 14 ethical codes. Our company operates in several different countries. All operations are firmly based on a common core of focus areas, values, and business principles, however adaptation and understanding of local practice and application is also key to our culture.

**1. Integrity: We always act in the best interests of the Byggfakta Group**

It is important that all colleagues see their own role in the organization and that everyone is aware about how they contribute to the strategic intent and goals that the Group is aiming to achieve. Where there is an actual or perceived risk of a conflict of interest between an employee's personal interest and Byggfakta Group's business interests this must be declared and avoided in line with local guidance and/or policy provision.

**2. Honesty: We always act honestly and fairly**

In the markets we are operating, we act honestly and fairly. We do not conduct business in a way that affects the markets in an unauthorized manner. This means that we do not share confidential information or enter into inappropriate agreements with suppliers, customers, or competitors. Confidential information is only revealed to authorities, which have the right to obtain the information by law, in specific circumstances.

**3. Respect: We respect human rights**

We strive to comply with the Declaration of Human Rights and the core conventions of the ILO (International Labour Organization). Our employees have the right to be represented by a union for collective negotiations as and where applicable. We do not tolerate any direct or indirect discrimination, victimisation, or harassment. The safety, quality, and well-being of our colleagues is a priority for us at all times. All our colleagues must have written employment agreements and must be informed about the terms of their employment, in their own language, so that they get a fair chance to fully understand the circumstances.

**4. Fairness: We treat all employees and colleagues fairly and equally.**

Our goal is to create an inclusive workplace culture that supports a balanced, supported, diverse and inclusive workforce. This means that we must respect and cooperate based on our differences, experiences, knowledge, competencies, skills, and values regardless of any other determinant factors. Discrimination, harassment and victimisation of any kind is neither acceptable or tolerable within the Byggfakta Group.

**5. Balance: We promote a healthy lifestyle and work-life balance and offer our colleagues a secure work environment.**

We want our colleagues to have balance both within and outside of their working day. We encourage colleagues to be active and exercise to assist with improved physical and mental well-being. We also work systematically and methodically to improve our work environment to prevent incidents and occupational injuries. We will continue to train mental health first aiders who can be the first point of contact for managers and or colleagues directly if they believe that someone may need some additional support.

**6. Responsible: We take responsibility for our environmental impacts**

We conduct our business in a responsible and environmentally sustainable manner. We have an established environmental, social and governance (ESG) policy through which we seek to minimise our negative environmental impacts, maximise our positive social impacts and support the transition to a more sustainable economy through our business activities.

**7. Taxation: We take responsibility as a tax-paying company**

We comply with applicable tax laws and regulations in the countries in which we operate. In all countries where Byggfakta Group conducts business, we ensure correct tax payments. We act responsibly and transparently and do not engage in unethical tax planning.

**8. Trustworthy: We respect integrity**

Information, regarding personal data, is one of the most important strategical assets in Byggfakta Group business. Therefore, it's crucial to protect information at a sufficient level based on: secrecy, correctness, availability and traceability. The Information security policy is the base for handling information security. This policy provides guidelines and instructions that steer the work to meet the overall goal for information security.

**9. Communication: We are precise in our communication**

Our communication must be fact-based, correct, relevant, distinct, and transparent, but not misleading. We treat all stakeholders equally. Our communication must take place in accordance with current law and regulation.

**10. Politics: We are neutral to political opinions**

Byggfakta Group does not engage in party politics activities in the countries in which we operate, and therefore we do not make political donations.

**11. Children's rights: No exploitation of child labour**

Byggfakta Group, our suppliers and customers must respect the regulations of the United Nations on human rights and children's rights. We commit to comply with the minimum age for admission to as well as the prohibition and immediate action of elimination of the worst forms of child labour. This must be monitored throughout the whole supply chain.

**12. Labour: Employment is freely chosen**

There is no forced, bonded, or involuntary prison labour. Any work or service that is exacted from any person under the menace of any penalty, for which that person has not offered himself or herself voluntarily, is strictly prohibited.

**13. Violations: Whistleblowing**

All employees are required to comply with this Code of Ethics and Conduct in all respects. It is the responsibility of all employees to report any violations or suspected violations or of events that could lead to any such violations. The Whistleblower Policy has been adopted to ensure that people can raise good faith concerns about actual or suspected violations without fear or reprisal or being threatened by doing so. Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. All concerns raised by the employee will be treated promptly, fairly and discreetly. No director or employee will be disadvantaged or victimised for raising good faith concerns.

**14. Prevention: Anti-money laundering**

Byggfakta Group is committed to fully prevent Anti-Money Laundering and Counter-Terrorist Financing. Byggfakta complies with all applicable laws and regulations wherever we conduct business or has business relationships.

## Legal compliance

### 1. **Legislation: Compliance with laws, rules, and regulation**

Byggfakta complies with local laws and practices wherever we conduct business. This compliance also includes Byggfakta's employees. We believe that fair competition is in the best interest of all market actors. Consequently, EQT complies with applicable competition laws and never enter anti-competitive agreements with competitors.

### 2. **Bribery: We do not accept any form of bribery**

Byggfakta complies with anti-corruption laws and practices wherever we conduct business. The company's Board of Directors is committed to zero tolerance of bribery. Bribery and attempted bribery are unacceptable, unlawful and completely against company policy, procedure and culture, and may result in disciplinary procedures against the individual involved.