



CORPORATE SOCIAL RESPONSIBILITY



POLICY
Corporate social
responsibility

POLICY OWNER
CEO

LAST UPDATE
2019-10-24

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2 BACKGROUND AND PURPOSE

To ensure that Bygghemma Group First AB (publ) and its direct and indirect subsidiaries ("Bygghemma Group" or the "Group") complies with applicable laws and regulations and that the Group values and way of working is valid throughout our entire organization, the Group has developed a number of group-wide policies, including this policy.

This policy regulates in a uniform way how the group manages activities related to Corporate responsibility as well as defining roles and responsibilities for the area.

3 POLICY

3.1 CORPORATE RESPONSIBILITY

Corporate responsibility can be defined in various ways; to us it is a possibility as well as an obligation to act responsibly towards all stakeholders including future generations. Bygghemma Group has a strong focus on sustainability from an economic, social and environmental perspective. Human rights, equal opportunities and environmental considerations should always be fulfilled and Bygghemma Group strives to develop relationships with suppliers that conduct their business in a similar ethical manner following prevailing laws.

Our corporate responsibility commits us to:

- Comply with the UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption. These principles are based on UN's Universal Declaration of Human Rights and ILO's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration as well as UN's Convention Against Corruption.
- Have sufficient information about laws and regulations in countries where we do business in order to at all-time abide by them.
- Supply terms of business that clearly explain Bygghemma Group's expectations and ethical standpoints as well as commit suppliers to act in congruence with the UN Global Compact's ten principles.
- Allow employees freedom of association and not tolerate forced labour or child labour.
- Act on the basis of our environmental policy and constantly seek new and better ways to minimise our environmental impact.
- To support fair and honest competition following the laws of countries where we do business.
- Have sufficient information about competitors, customers and suppliers before entering commercial relationships.

- Act fair and honest towards suppliers and subcontractors.
- Not engage in any activity which is, or could be perceived to be, corrupt, fraudulent, improper or unlawful.
- Not to offer, pay or accept bribes or substantial favors that could affect the outcome of a business decision.
- Not to participate in party politics or make donations to political party funds or candidates.
- Supply products and services that meet our customers' expectations regarding quality, safety, service and production.
- Guarantee safe and secure handling of personal information provided by customers on all our web platforms.

3.2 EQUAL OPPORTUNITIES, DIVERSITY AND INCLUSION

Bygghemma Group believes in equal opportunities throughout all aspects of employment. The fundamental principle is equal pay for equal work, regardless of gender. We regard a diverse workforce as valuable for innovation, customer adaptation and competitive edge, both among ourselves and our suppliers. Bygghemma Group promote equal opportunities irrespective of race, ethnical background, religion, nationality, gender, mental or physical disabilities, marital status, age, sexual orientation or any other status unrelated to the individual's ability to perform his/her job.

Bygghemma Group promotes equal opportunity to all employees, applicants for employment or promotion, suppliers, customers and members of the public with whom we come into contact. For us this means:

- Actively working to provide a physical and psychosocial work environment suitable for the entire workforce.
- Providing a work environment without any kind of discrimination, special treatments, sexual, physical or mental harassments (including bullying), or any other violating actions.
- Providing equal reward, pay, benefits, work conditions, possibilities and career opportunities for equal achievement, work difficulty and equivalent effort.
- Providing all personnel with access to education and feedback and development opportunities through ongoing performance management.
- Actively working towards a more equally balanced workforce throughout the company in order to leverage the value of diversity and equality for all our stakeholders.
- Provide a safe, clean and secure work environment.
- Everyone working for Bygghemma Group, in particular those in a management position, has a responsibility in the daily work to ensure compliance to above commitments.

Bygghemma Group is attempting to build an organization which is not dependent on individuals. Such a structure facilitates the opportunity for each employee to balance work and private life, irrespective of status.

3.3 OUR EXPECTATIONS FROM OUR SUPPLIERS

At Bygghemma Group, we seek to conduct our relationships with our suppliers in a decent and proper way and we seek to develop relationships with suppliers that conduct their business in an ethical manner. Bygghemma Groups' supplier principles are integrated in our code of conduct and apply to all companies, suppliers and manufacturers that we conduct business with.

- We expect our suppliers to support universal human rights.
- We expect our suppliers and subcontractors to allow employees freedom of association.
- We expect our suppliers to operate employment practices that respect human dignity.
- We expect our suppliers to judge their employees and contractors based upon their ability to do their jobs and not upon their physical and/or personal characteristics or beliefs, affirming the principle of no unlawful discrimination based on race, ethnical background, religion, nationality, gender, mental or physical disabilities, marital status, age, sexual orientation or any other status unrelated to the individual's ability to perform his/her job.
- We expect our suppliers neither to employ anyone under the legal working age nor to condone physical or other unlawful abuse or harassment, or the use of forced or other compulsory labour in any of their operations.
- We expect our suppliers to follow all applicable laws, and similar standards and principles in the countries in which they operate.

3.4 ENVIRONMENT

Bygghemma Group regards the issue of environmental responsibility as a serious one, on both a Group- and an employee level. At Bygghemma Group we take pride in minimising our environmental impact and carefully consider the environment in all areas of our business.

Our environmental policy commits us to:

- Complying with all relevant environmental legislation, codes of conduct and other regulatory requirements in all countries where we operate.
- Placing responsibility for our environmental performance with our Executive Management and Board members.

- Actively work to reduce our direct environmental impact such as usage of raw materials and energy.
- Work towards having business agreements with environmentally friendly suppliers and producers.
- To reduce our pollution travel only when absolutely necessary and if it is then by train is always the first option.
- Producing quarterly and annual reports available for download online instead of printing and distributing hard copies.
- Helping to reduce the waste problem by using renewable materials and handling waste in a safe and responsible way.
- Recycling and use renewable materials where possible.
- Communicating digitally, through the internet, to minimise our use of paper, print and transport.

3.5 ALCOHOL AND DRUGS

Bygghemma Group's policy on the use of alcohol and drugs is based on Bygghemma Group's commitment to assist employees wherever possible, to provide a safe and secure working environment for employees, to produce a quality service, and to protect the integrity of Bygghemma Group's reputation. It is company policy that employees shall not during working hours or whilst on company business and whether on company premises or no matter when, when using company vehicles:

- Sell, purchase, possess, supply consume or use alcohol, controlled or volatile substances.
- Exceptions to the rule above may be made for alcohol during special occasions or representations. Special permission can only be granted from either executive management or executive in charge.
- Arrive at workplace under influence of any alcohol or substance
- Drive company vehicles or private vehicles on company business, or otherwise, whilst under the influence of alcohol or controlled substances or volatile substances.
- Company business shall for the purposes of this policy include attending conferences/business meetings/company and client functions.

3.6 WHISTLE-BLOWER

Bygghemma Group is committed to ensure that any incident of work place malpractice is prevented wherever possible, and immediately dealt with, should they arise. Employees are often the first to realise that something is wrong in the work place but they may feel that they cannot express their concerns because to do so would be disloyal to their colleagues or to Bygghemma Group or could result in them being subjected to harassment or victimisation.



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For the purposes of this whistle-blower's procedure, Bygghemma Group considers the following matters to constitute malpractice:

- A criminal offence has been committed, is being committed, or is likely to be committed or
- A person has failed, is failing, or is likely to fail to comply with their legal obligations or
- A miscarriage of justice has occurred, is occurring, or is likely to occur or
- An individual has failed, is failing, or is likely to fail to comply with Bygghemma Group Code of conduct or
- The health and safety of any individual has been, is being, or is likely to be endangered or
- The environment has been, is being or is likely to be damaged or
- There has been any manipulation of financial data or accounting records or
- Any of the above are being, or are likely to be, deliberately concealed.

For further information, review the Bygghemma Group management handbook and employee policies available from Bygghemma Group's Head office in Malmö.

4 RELEVANT ENTITY

This policy applies to all entities within the Bygghemma Group.

5 ROLES AND RESPONSIBILITIES

The CEO is responsible for this policy. The Board of Bygghemma Group First AB (publ) is the authorised approver of the Corporate Responsibility Policy.

6 EXCEPTIONS

Any need for exceptions to this policy must be clearly defined and documented. All exceptions shall be approved by the CEO and communicated to the policy owner who is responsible for reporting to the Board.

7 MONITORING OF COMPLIANCE

Measurement includes:

- Material sustainability aspects are monitored and reviewed on an annual basis and reported to the Board.

8 REFERENCES

- Code of Conduct
- Human Resource Policy
- Procurement Policy
- Environmental Policy