

Code of Conduct

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1 About Our Values and Making Good Choices

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- Why Do We Have a Code of Conduct?
- My Responsibility as an Employee at Fasadgruppen
- My Responsibility as a Manager at Fasadgruppen
- How Do We Make Good Decisions?
- Ethical Dilemmas – Examples and Advice
- Consequences of Violating the Code of Conduct



“Fasadgruppen’s most important asset is and will always be our employees. As employees of Fasadgruppen, we all share the responsibility to create a work environment based on respect, integrity, and collaboration. Our Code of Conduct is not just a document – it is a living expression of how we relate to each other, our customers, and our suppliers. It reflects our shared values and sets the standard for how we act in different situations.

Our goal is to be a company guided by strong ethics, while also being open to learning and evolving together. This updated version of our Code of Conduct is designed to be clear, accessible, and relevant to all employees, regardless of their role. We believe this document will help us strengthen our culture and reputation, and contribute to an even more inclusive and positive work environment.

I am proud to be part of Fasadgruppen and look forward to continuing the work with all of you to make our company an even better place to work – for ourselves and our partners.”

Martin Jacobsson, CEO

What We Stand For at Fasadgruppen

At Fasadgruppen, we build more than facades – we build trust, quality, and long-term relationships. As the leading facade company in the Nordics, we have a responsibility to run our operations ethically, sustainably, and professionally.

We create value for our customers, employees, and society through our core values:

Collaboration

We believe in the power of unity. By working closely with customers, suppliers, and partners, we find the best solutions.

Through openness, trust, and respect, we foster an inclusive work environment and build long-term relationships.

Commitment

We take pride in what we do and take ownership of our projects. We keep our promises, strive to exceed expectations, and take initiative for improvement.

Commitment means delivering quality, being reliable, and contributing to a more sustainable industry.

Competence

With solid experience and continuous development, we ensure high quality in everything we deliver.

We invest in our employees and share knowledge across the company to constantly improve.

Our competence makes us a trustworthy and innovative partner.

These values guide our decisions and ensure that we operate with integrity, responsibility, and quality. Together, we build facades that last – and relationships that create future opportunities.

Why Do We Have a Code of Conduct?



A Code of Conduct is a set of principles that describes expected behavior in an organization. It helps ensure a respectful, safe, and professional environment.

At Fasadgruppen, we want a workplace where everyone feels good, safe, and clear about what’s expected. Our Code of Conduct helps us make good decisions and act professionally, whether in the office or on a construction site.

These guidelines are here to support you in everyday decisions. They show how we treat one another, our customers, and our partners—and how we protect the company’s reputation.

They are based on our core values and international standards like the OECD Guidelines and the UN Global Compact.

We expect external parties—suppliers, subcontractors, consultants, brokers, and agents—to commit to our Supplier Code of Conduct.

My Responsibility as an Employee

As an employee, I am responsible for knowing and following this Code of Conduct. This means making the right choices, treating others with respect, and contributing to a safe, inclusive, and responsible work environment.

Fasadgruppen expects me to:

- Act according to our values and this Code.
- Avoid actions that are—or could be perceived as—unethical or illegal.
- Ask for advice if I face ethical dilemmas.
- Report any suspected violations of the Code, law, or internal rules.

My Responsibility as a Manager

As a manager, I serve as a role model and have a special responsibility to foster a culture where it is natural to make good decisions, act with integrity, and speak up when something is wrong.

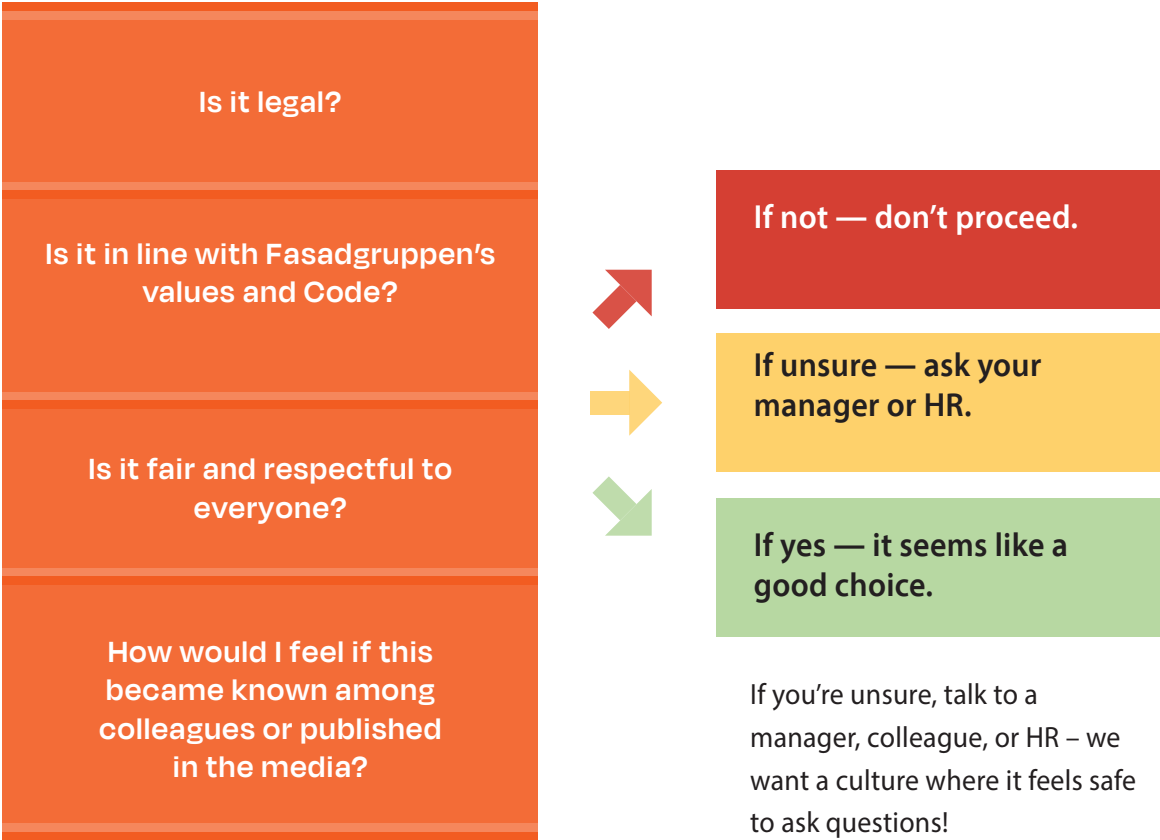
In addition to following the Code myself, I must:

- Ensure employees and representatives understand and follow our values and rules.
- Promote a culture of trust, openness, and respect—where it is safe to speak up.
- Engage and support employees and create the conditions for cooperation, commitment, and development.
- Make decisions in the best interest of Fasadgruppen, our clients, colleagues, and partners.



How Do We Make Good Decisions?

Sometimes it's clear what's right—we follow the law, act honestly, and treat others with respect. Other times, it's not so simple. Use this checklist:



Ethical Dilemmas – Examples and Advice

Situation:	What to do:
A customer offers you a gift that seems expensive. Can you accept it?	Check our guidelines on gifts. If it's a symbolic gesture, it might be acceptable. If it's an expensive gift, it could create a conflict of interest. Ask your immediate manager if you're unsure.
You discover that a colleague is taking shortcuts that could compromise safety.	Safety always comes first. Speak to your colleague in a friendly way, or bring it up with your immediate manager if you're concerned.
You're asked to sign a report with figures you're not sure are accurate.	Ask for the background behind the figures before signing. If something seems unclear, it's always better to ask for an explanation than to take a chance.
You're offered hourly rates below the accepted minimum wage by a subcontractor seeking a job.	Such offers violate our ethical guidelines and our commitment to fair working conditions. Decline the offer and inform your immediate manager. We must never contribute to social dumping or unfair labor practices.

Our ethical guidelines are here to support you in your day-to-day work. By making good decisions together, we build a strong culture based on trust and respect.



Consequences of Violating the Ethical Guidelines

Violations of our ethical guidelines or the law have consequences, including fines and, in the worst case, imprisonment.

This also applies to managers who ignore or allow such violations, whether through negligence or by being aware of the situation without taking action.

The severity of the violation determines the response, which can range from internal measures to reporting the matter to relevant authorities.

2 Work Environment

- Decent working conditions
- Health, safety, and well-being
- Drugs and alcohol
- Diversity and inclusion
- Bullying and harassment

At Fasadgruppen, everyone should have a safe and inclusive workplace where we show respect for one another and collaborate well.

A good work environment is about more than just physical surroundings – it’s about well-being, safety, and how we treat each other.

We must always comply with national and local laws, our HR policy, and the internal employee handbook, which provide clear guidelines for how we work and thrive together.

Decent Working Conditions

- Respect work hours, fair pay, and labor rights.
- Recognize the right to unionize and collectively bargain.
- Treat everyone fairly—regardless of position or background.



IMPORTANT!

All work must be carried out voluntarily and in accordance with work instructions.
No form of forced labor or work linked to threats or punishment is permitted.



Health, Safety, and Well-being

Safety always comes first. No job is so important that it should be done at the expense of health. We must:

- Stop work if something is not safe – “work safely or not at all.”
- Follow safety procedures, use the correct protective equipment, and take responsibility for ourselves and our colleagues.
- Take care of our own and others’ mental and physical health – it’s okay to speak up if you’re not feeling well.

Drugs and Alcohol

To ensure a safe and professional work environment, we have zero tolerance for being under the influence of alcohol or drugs at work.

- It is not permitted to come to work under the influence of alcohol, narcotics, or other drugs.
- At company events, alcohol may be served responsibly, but non-alcoholic options must always be available.
- If you have a colleague who is struggling with substance abuse, contact your manager or HR – we offer support, not punishment.

Diversity and Inclusion

We believe in a work environment where everyone is respected—regardless of background, gender, age, or other differences.

Fasadgruppen is committed to:

- Treating everyone with respect and recognizing the value of diverse perspectives.
- Ensuring equal opportunities for all, without discrimination.
- Building an inclusive culture where everyone feels welcome and safe.

Bullying and Harassment

We have zero tolerance for bullying, harassment, and discrimination in any form—both in the workplace and through digital channels.

What should you do if you witness or experience discrimination?

- Speak directly to the person involved, if you feel safe doing so.
- Contact your manager or HR if you need support.
- Use the whistleblower channel on our website to report serious incidents anonymously.

Remember: All reports are taken seriously, and you are protected from retaliation.



What is bullying?

Repeated negative behavior toward a person that creates fear, insecurity, or exclusion—physically, verbally, or digitally.

What is harassment?

Unwanted behavior that creates an offensive or hostile work environment—for example, derogatory comments or sexual advances.

A safe and inclusive work environment is something we create together.

When we care for one another and work according to strong values, we build a healthy and resilient company culture.

3 Commitment to a Sustainable Business

- Climate and Environment
- Net Zero and Science Based Targets (SBTi)
- Human Rights in the Supply Chain
- How Can You Contribute?



We take sustainability seriously and aim to be an industry leader in climate and environmental efforts.

We are committed to reducing our environmental impact across the entire value chain.

This means we work systematically to integrate sustainability into all parts of our operations—from material choices and energy use to transport and supplier collaboration.

Climate and Environment

We have set ambitious environmental goals to reduce our climate footprint and contribute to sustainable development:

- We will reduce our CO₂ emissions.
- We actively work to minimize emissions through smarter transport, energy-efficient buildings, and environmentally friendly materials.
- We will prioritize sustainable products and solutions.
- We actively participate in the development of more eco-friendly construction methods.
- We will maintain an environmental focus throughout the value chain.

Together with our suppliers and partners, we are shaping a more sustainable industry by finding better solutions every day.



Net Zero and Science Based Targets (SBTi)

Fasadgruppen has committed to achieving net zero emissions by 2045, in line with the Science Based Targets initiative (SBTi).



What is Net Zero?

Net Zero means reducing our greenhouse gas emissions to near zero and offsetting any remaining emissions through actions such as carbon capture or tree planting.

What is SBTi?

The Science Based Targets initiative (SBTi) is a global standard that helps companies set climate targets in line with scientific recommendations to limit global warming to 1.5°C.

Fasadgruppen’s targets have been validated by SBTi, which means we commit to a documented and credible path toward emission reductions.

To achieve this, we work in a targeted way with data, reporting, and collaboration across the group.

We continuously improve our processes to ensure that we reach our goals effectively and realistically.

Human Rights in the Supply Chain

We are committed to ensuring responsible working conditions throughout our supply chain.

How we safeguard human rights:

- Zero tolerance for child labor and forced labor.
- Fair and safe working conditions among our suppliers.
- Selecting partners who share our values regarding human rights and ethical standards.

Together with our suppliers and partners, we are creating a more sustainable industry every day by finding better solutions.

How Can You Contribute?

Sustainability starts with all of us.

Small actions every day can make a big difference.

- Choose environmentally friendly options whenever possible —such as carpooling, reducing waste, and using resources efficiently.
- Follow guidelines for waste management and our environmental policy. Think about reuse and other sustainable alternatives.
- Ask questions! Do you see a more sustainable solution or have ideas for improvement? Talk to your manager. We value cross-disciplinary competence—collaboration is key!

Together, we take responsibility for building a more sustainable future—a quality façade for both the environment and society!

4 Anti-Corruption and Business Ethics

What is Corruption?

Gifts and Hospitality

Social Responsibility and Integrity



At Fasadgruppen, we have zero tolerance for corruption, bribery, money laundering, and financial crime.

We must always act honestly and responsibly—internally and in dealings with customers, suppliers, public authorities, and other partners.

This means we:

- Comply with laws and regulations in every country where we operate.
- Act ethically and with high integrity in our business relationships.
- Clearly reject all forms of financial crime, such as corruption, extortion, and money laundering.
- Promote fair competition and equal opportunities.
- Avoid and manage conflicts of interest in a transparent and orderly way.



What does this mean in practice?



We:

- Never give or accept bribes —directly, indirectly, or through third parties.
- Do not offer anything of value—such as money, gifts, or services—to influence decisions or gain improper advantages.
- Do not make facilitation payments —even small sums to “speed up” a process count as corruption.
- Do not engage intermediaries without a clear business rationale and proper documentation.



We also:

- Act openly and with integrity —even when it means turning down an assignment.
- Report all suspected misconduct to a manager or via the whistleblower channel.
- Carefully document anything that could be perceived as a gift, hospitality, or entertainment.

Common Terms Explained

What is a bribe?

Giving, promising, receiving, or asking for something of value in order to influence decisions and gain an improper advantage.

What is corruption?

The abuse of power or position for personal gain —such as bribery, favoritism, embezzlement, or fraud.

What is “something of value”?

This may include money, gifts, discounts, services, travel, sponsorships, donations, or job offers.

Who is a public official?

Anyone working for the government, a municipality, in politics, a public organization, or a state-owned enterprise.

What is a conflict of interest?

When personal interests, relationships, or roles may influence your work decisions —or create the appearance of doing so.

Gifts and Hospitality

We only give or accept gifts or hospitality (such as meals or events) when it is:

- Modest and appropriate.
- Part of a legitimate business relationship.
- In accordance with internal guidelines and properly documented.



We never accept:

- Cash or gift cards.
- Frequent or lavish invitations.
- Anything that could influence decisions—or appear to do so.

Social Responsibility and Integrity

We support the local communities where we operate—but never in ways that could be perceived as improper influence.

- We never offer promises or contributions that could create expectations of a return favor.
- We follow approved procedures for community investments.

Do you have questions or concerns?

Speak with your manager, HR, or use the whistleblower service on our website. Speaking up is an important part of protecting our culture—and doing the right thing should never have negative consequences.

Link to [Whistleblower service](#).

5 Personal Data and IT Security

Our Responsibilities

Be Alert – Digital Security Starts with You

Personal Data – We Protect Others' Data Like Our Own

What Counts as Personal Data?



At Fasadgruppen, we take information security and data protection very seriously.

We all share the responsibility to protect both our own and others' information, and to handle company IT equipment and data in a safe and responsible way.

Our Responsibilities

Your awareness is the most important factor in preventing sensitive information from ending up in the wrong hands or exposing us to digital threats.

This means we must all stay alert in our digital everyday work and follow established routines.

This includes:

- Following Fasadgruppen's IT policies and guidelines.
- Locking your computer when unattended and handling borrowed equipment with care.
- Using secure passwords—and never sharing them with others.
- Installing only approved software and ensuring everything we use is properly licensed.
- Storing and sharing information only through approved and access-controlled systems.
- Deleting files and data that are no longer needed.
- Notifying IT or your manager if you suspect a security incident.

Be Alert – Digital Security Starts with You

We must be vigilant against phishing, fake emails, and social engineering attempts.

This means we:

- Do not open suspicious attachments or links.
- Avoid using unknown USB devices or visiting unsafe websites.
- Never share sensitive information unless we are sure of the recipient.
- Take extra precautions when working from public places or at home—use VPN when connecting to unfamiliar networks.

Personal Data – We Protect Others’ Data Like Our Own

We are responsible for processing personal data in a lawful and secure manner.

This applies to everything from contact details and ID numbers to health data and images.

This means we:

- Collect, use, and store personal data only when necessary and legally permitted.
- Clearly inform individuals about why their data is used and how it is handled.
- Ensure only authorized personnel with a need-to-know have access.
- Delete or anonymize personal data when it is no longer needed.

What Counts as Personal Data?

Personal data is any information that can be linked to an individual—directly or indirectly.

This may include:

- Name, phone number, or email address
- Family details
- Personal ID number
- Photos, videos, or IP address
- Health information or bank account numbers



Do you have questions or feel unsure?

- Speak with your immediate manager or the IT department.
- If you suspect a data breach or unusual activity—report it immediately.

6 Confidentiality and Insider Information

Confidentiality

What Is Insider Information?

What Is Not Allowed – and What to Do if You're Unsure

At Fasadgruppen, we have access to information that is not always known to others.

This information must be handled with great care—to protect the company, our customers, and the market's trust.

Confidentiality

All confidential information you access at work must be treated discreetly.

This includes trade secrets, customer data, personal data, project details, and other internal matters.

- You must not share such information with unauthorized persons
—not with colleagues who don't need it, nor with family or friends.
- Confidentiality applies even after you leave the company.





What Is Insider Information?

Insider Trading – What You Need to Know

Fasadgruppen is a publicly listed company. This means we follow strict rules regarding insider information and trading.

Insider information is:

- Not publicly known
- Likely to affect the value of Fasadgruppen's shares or other financial instruments

Examples may include:

- Unannounced financial results
- Major acquisitions or mergers
- New contracts or high-value projects
- Leadership changes or significant risks

What Is Not Allowed – and What to Do if You're Unsure

You must not:

- Buy or sell Fasadgruppen shares if you have insider information.
- Share insider information with others—including close friends or family.
- Advise others to buy or sell shares based on such information.

This applies to your close relations as well.

Violations of insider trading rules are serious and may lead to criminal penalties and dismissal.

If you're unsure:

- Consult your manager, finance team, or legal contact.
- For questions from media or investors
—always refer them to Fasadgruppen's communications officer.

7

Talk to Us – Whistleblowing

- What Can You Report?
- Who Can You Talk To?
- What Happens When You Report?
- Your Protection as a Whistleblower



At Fasadgruppen, it should feel safe to speak up.

We want a transparent culture where everyone dares to ask questions, give feedback, and report wrongdoing—without fear of consequences.

Whistleblowing is about protecting colleagues, the company, and our values.

What Can You Report?

You should speak up if you discover something that conflicts with our Code of Conduct, laws, or values.

This includes:

- Bullying, harassment, or discrimination
- Corruption, financial misconduct, or conflicts of interest
- Violations of health, safety, or environmental rules
- Misuse of information, threats, or illegal acts
- Human rights violations or unethical supplier practices



Who Can You Talk To?

- Your immediate manager
- The HR department
- Another manager you trust

You can also use our whistleblower channel on the website—where you may choose to remain anonymous.

What Happens When You Report?

- Whistleblower reports are taken seriously and handled confidentially.
- You will be supported throughout the process—we investigate in a structured and fair manner.
- You are protected from retaliation—doing the right thing should never lead to negative consequences.

Your Protection as a Whistleblower

!

Remember:
You don't need to be 100% sure to raise a concern—a well-founded suspicion is enough.

The most important thing is that you speak up so we can act.

By speaking up, you help strengthen our company culture and make Fasadgruppen a safer workplace—for everyone.

All new employees receive an introduction to this document
and are expected to understand its content.

This document is approved by group management and updated
annually by HR and Compliance, with support from Legal.

Signatur:

Reviderat av:

Datum: