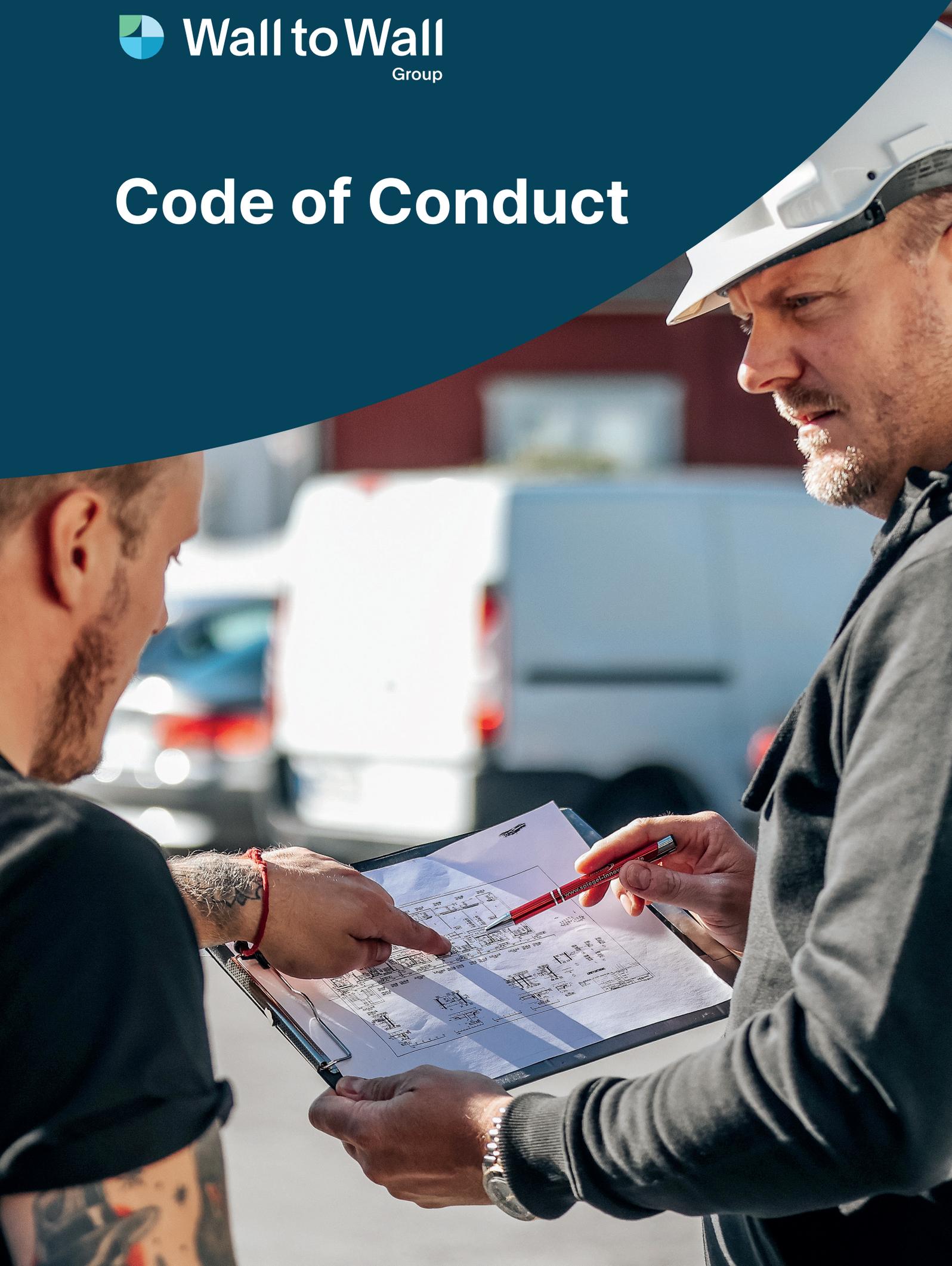


# Code of Conduct





# Code of Conduct

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## A message from the CEO

We are Wall to Wall Group and we offer services that include pipe relining and flushing, pipe inspections and sealing of ventilation ducts, as well as geothermal energy. We operate at a number of sites in Sweden, Norway, Denmark and Finland. Our head office is in Ovesholm, not far from Kristianstad in Skåne, Sweden.

Sustainability is a key area for us and impacts all aspects of the Group's work. We make every effort, every day, to contribute to more sustainable production and consumption. We also want our efforts to create added value for our customers and stakeholders.

The Group's code of conduct has been produced as a way of clarifying what our values mean in our day-to-day work, and to support each individual employee in their professional role. We think it is important that those around us can trust us and can rely on our professionalism and integrity. We therefore need to be professional in our interactions with colleagues, customers, suppliers and other stakeholders. We need to earn their trust. Our conduct is underpinned by our values and the standards we set ourselves. We know what is right and act accordingly.

This code of conduct will help make it clearer and easier to work towards shared objectives and a common culture – both in our relationship with customers and internally within the Group. If, as an employee, you have any questions or are unsure about something, please consult your immediate manager.

We want to continue to develop and strengthen the company that we are already so proud of. We want to be a company that makes a considerable difference to society and our local environments. A company where people are happy and can thrive.

This code of conduct sets out the rules that govern our behaviour. I encourage all of you, as Group employees, to read through this document carefully and to view it as guidance in your day-to-day work. I also invite the Group's customers and suppliers to read our code of conduct, which explains the values we work by and the objectives we set ourselves. These are the foundations on which Wall to Wall Group is built. Together, we are creating a world-class company.

*Kind regards,  
Joachim Welin, CEO*



## Sustainability

We have always regarded being a sustainable business as our highest priority. This approach permeates all our activities, from transport and recycling to construction and operation. Our privileged position enables us to influence both our customers and suppliers in a positive manner. We therefore endeavour to work, both internally and externally, to promote more sustainable production and consumption.

Sustainability issues at Wall to Wall Group are an integral part of our business activities and aim to create value for all our stakeholders.

Within the Group we focus actively on preventing errors, defects and environmental impact, rather than remedying their effects at a later point. When we talk about a better environment, we mean all aspects from transport and production to the materials we use. We always set stringent requirements for our suppliers and only choose materials that have been produced under decent working conditions. Together, we can take responsibility for sustainable development!

## Culture and values

We believe in a culture that looks after everyone's best interests and promotes participation and community. Where everyone feels ownership and responsibility for our shared task. Here, it is OK to fail, provided we learn from our mistakes in order to do better next time.

We have summarized our culture in a philosophy for everyday life and work:

We make things possible – together

Our culture is based on our core values, which govern our behaviour and decision-making processes.

We are courageous

We focus on solutions

We are results-oriented

We are decent

Our employees are responsible, cooperative, customer-oriented, organized, socially conscious and respectful of their colleagues.

Our managers should be role models and team players, as well as enterprising, communicative, inclusive and encouraging. As a senior manager, you also need to have vision and a strategic mind-set, and be able to lead others towards our vision.



## Diversity, equality and inclusion

Wall to Wall Group and our subsidiaries strive to be gender-equal workplaces where men and women have the same rights, obligations and opportunities for professional development. We value and reward competence and performance, regardless of gender.

There is zero tolerance of discrimination and we do not accept our company being associated with any form of harassment. We emphasize equal rights and obligations for all, irrespective of ethnicity, gender, gender identity or expression, religion or other belief, sexual orientation, age or disability.

We regard diversity as an enriching asset for our company. By experiencing and understanding one another's differences, we are able to work together to create a pleasant internal work environment and develop strong external relationships.

We are determined to promote a culture where each individual, irrespective of background, feels included and respected. We endeavour to be a workplace where differences are not only accepted but also celebrated, and where each employee's unique contributions are valued.

Our commitment to equality and diversity extends to all levels of our organization. We are committed to regularly evaluating and improving our methods in order to ensure that we remain a model workplace, where everyone is happy and can thrive.

## Development

We believe in the importance of promoting personal development and organizing annual P&D discussions with all of our employees. We want to encourage our employees' innovative abilities and reward good performance. Promotion and recruitment reflect the market needs of our company and take into account the qualifications required for the work to be performed. Another important approach is offering continuing education and training, and for this we have our own Academy that offers relevant training for all employees.



## Health, work environment and safety

We want to ensure the good health and wellbeing of all our employees. They are our most valuable resource, and if they are doing well, then our companies are too. We support and respect international conventions on human rights.

A safe workplace with systematic work environment management

A safe and pleasant work environment is a strategically important aspect for company development and our employees. The employer has ultimate responsibility for the work environment, and it is our duty to work systematically on work environment issues and ensure employee safety. Our objective is to create a physically and psychosocially healthy workplace that enables our employees to thrive, and where the risk of occupational injuries and ill-health has been eliminated. The Swedish Work Environment Act, the Work Environment Ordinance and the provisions of the Swedish Work Environment Authority provide the foundations for our work environment management.

Each and every employee has work environment responsibility, which involves, for instance, complying with safety regulations and reporting risks and deficiencies in the work environment to their immediate manager. Our managers are responsible for employee safety and are expected to promote understanding of required safety measures, as well as provide clear instructions and ensure compliance with these. Work adaptation and rehabilitation matters are considered an integral and important aspect of our efforts to ensure a good work environment.

Our ultimate aim is to create a zero harm workplace. To achieve this, we document all incidents and events that may have a negative impact on the work environment. We endeavour to promote a work environment where job satisfaction and community are evident every day and where everyone is happy and can thrive. We advocate workplaces with zero tolerance of bullying and harassment, and our work environments are characterized by transparency, respect and solidarity. Our ambition is for each and every employee to have job satisfaction and to develop, both professionally and personally. A healthy work environment is a key factor in being an attractive employer.

## **A workplace free from alcohol and drugs**

We are a sober workplace and work is never performed under the influence of alcohol or drugs. Our decision-making is responsible and autonomous. We support one another and offer help to colleagues struggling with alcohol or drug-related problems. In addition, we respect all applicable laws on alcohol and drugs, both within and outside the workplace. In observing these principles, we create a safe and respectful work environment for all.



## Financial responsibility

We will be a group that people can trust and which always keeps its word. We only engage in business activities that comply with national laws, international conventions, concluded agreements and are in accordance with our code of conduct. We respect and observe competition rules, environmental legislation, labour market legislation, agreements and safety requirements, as well as other regulations that provide a framework for our activities. Wall to Wall Group believes in long-term business relationships, where we, together with our business partners, create a solid footing for good financial results. All financial transactions must be recorded in accordance with the company's accounting principles and comply with applicable laws, regulations and standards. Accounting must show the nature of all transactions in a correct and non-misleading way. Our external financial reporting must be reliable and complete.

We do not accept the Group or any of our partners behaving in an illegal manner that hinders free competition. Therefore, we do not participate in any form of price-fixing, cartels or other practices that contravene current competition rules, and we support healthy and free competition in all areas of the business.

## Gifts and hospitality

Exchanging gifts and other benefits with customers and suppliers is a practice that, if handled incorrectly, can result in serious legal consequences. We stress how important it is to act with caution and restraint, both when giving and receiving gifts. The same is true when we organize customer events or other activities. Offering overly generous gifts and events may be interpreted as bribery and corruption – two serious crimes that carry heavy penalties.

We want to emphasize that bribery and corruption are categorized as serious crimes, and we adopt a zero tolerance policy for these offences. We are committed to following strict ethical guidelines and laws in order to ensure fair and responsible business practices.

This awareness is key to building and maintaining trust among our customers, suppliers and society as a whole. We encourage everyone in our organization to be especially alert and to act in accordance with our high ethical standards when it comes to gifts and hospitality. By maintaining a healthy and responsible approach in these areas, we strengthen not only our reputation as a reliable partner, but also contribute to a healthy business culture in the long term.

## Sponsorship

As regards sponsorship, consideration should first be paid to helping voluntary activities and non-profit activities. We must not sponsor potential customers or suppliers. If we do this with the intention, consciously or unconsciously, of influencing the recipient to give us an advantage, this may be passive corruption.

## Trips

Any trips with our partners must always be approved in advanced as per the 'grandfather principle'. The general rule is that everyone pays for their own accommodation and travel.



## Conflicts of interest

Conflicts of interest between employees and the company must be avoided. If personal interests have the potential to affect a decision, the matter must be passed to the immediate manager for a decision. Our employees may not exploit relationships with partners for their own benefit.

## Customers and quality

We want to be the industry's leading partner for property owners in the green property transition.

Quality management is an integral part of our business. We must always act in accordance with applicable laws, regulations, standards and other requirements that are relevant for our business. We aim to achieve our objectives and exceed quality requirements, both our own and those set by our customers and owners, by ensuring consistent and efficient working methods, a common understanding of roles and responsibilities, and a desire to see continual improvement throughout the organization.

Wall to Wall Group focuses on having dedicated personnel who systematically work to deliver continual improvement, taking our starting point in the zero defect principle. This means that we proactively focus on preventing errors and defects, rather than remedying their effects at a later point. We hope that this approach will not just enable us to meet expectations, but also to exceed them and create outstanding value for our customers and owners.

## Purchasing

Purchasing for Wall to Wall Group must always be conducted in a responsible manner to ensure dependable and long-term business relationships. We expect our suppliers to comply with national laws, rules and regulations and to respect international conventions.

We take a risk-based approach and set requirements from a sustainability perspective for our suppliers, purchased services and products. Requirements are set through, among other things, supplier evaluations and regular visits to our suppliers. We have a clearly communicated purchasing process, and we cooperate closely with our suppliers to deliver improvements. We must always have written agreements and review set requirements and take action in the event of non-conformances. We may, if necessary, conduct our own independent quality tests on relevant products.

## Information and communication

Information activities within the company must support the company's vision, business concept and strategies. They must strengthen the brand and generate business cases and customer benefit. We must comply with marketing legislation and rules in the countries where we operate. We must also work to ensure clear and honest communication. Our information and communication is based on transparency, clarity, relevance and accessibility, and it must be active.

### **Reliable and secure information management**

Information security must be an integral part of our business activities and contribute to creating value for customers, owners and other stakeholders.

Information security means:

- The information is available when needed.
- The information is accurate, i.e. up to date, correct and complete.
- The information is only accessible to authorized persons.
- Information management is traceable. In other words, it is possible to establish who has received the information, what changes have been made, and who made those changes.

We must comply with applicable legislation and other requirements established by customers and suppliers. We respect the individual's fundamental right to a private life. Personal data must be collected in a correct and lawful manner, be relevant for the purpose for which it has been collected, and be processed with great care, in accordance with our GDPR policy. We are prepared and have the necessary resources and procedures to respond to and resolve unplanned IT events in order to quickly return to a normal situation. We must continuously review, revise and improve activities from an information security perspective.



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