



## **SUSTAINABILITY POLICY**

**for**

**NYFOSA AB, reg. no. 559131-0833**

**Adopted by the Board of Directors on June 16, 2025**

*This is an in-house English translation. If there are differences between the English translation and the Swedish original ("Hållbarhetspolicy"), the Swedish text will take precedence.*

## **1 PRINCIPLES**

- 1.1 Nyfosa AB ("**Nyfosa**" or "**the Company**") shall adhere to the main purpose provision of the Swedish Companies Act, which is to generate returns for shareholders. A focus on returns does not exclude sustainable business practices; rather, it is a prerequisite for making correct decisions for the Company's future direction. Nyfosa shall act responsibly in all relationships, such as employer, landlord and borrower, as well as towards society, the climate, and as manager of the shareholders' capital.
- 1.2 Nyfosa shall work in accordance with the 2030 Agenda for Sustainable Development and the UN Sustainable Development Goals, which aim to eradicate poverty and hunger, realize human rights for all, achieve gender equality and empowerment for all women and girls, as well as ensuring lasting protection of the planet and its natural resources. To contribute to sustainable development, the Company shall focus on the global goals directly influenced by its operations.

## **2 RESPONSIBILITY**

- 2.1 This policy applies to all employees and all parts of Nyfosa's operations.
- 2.2 Nyfosa shall appoint a sustainability group consisting of the Company's CEO, the Heads of Technology and Sustainability for Nyfosa Sweden and Kielo, the Head of Finance, the CFO and, where necessary, the corporate lawyer. The group shall establish an annual schedule of meetings. Investment decisions shall follow the Company's ordinary authorization matrix.
- 2.3 The sustainability group is responsible for:
- a) ensuring compliance with the sustainability policy;
  - b) developing strategies to achieve the sustainability targets;
  - c) ensuring compliance with conditions of green financing, including:
    - i) ensuring that selected assets and green investments meet the conditions;
    - ii) regularly monitoring that capital from green financing is allocated according to conditions;
    - iii) identifying substitute investments where required;
    - iv) preparing reports for lenders of green capital; and
    - v) updating the financial framework as needed,
  - d) annually reviewing and preparing proposed amendments and/or additions to the Company's "Guidelines for Sustainability Efforts"; and
  - e) annually reviewing and preparing proposed amendments and/or additions to the Company's "Supplier Code of Conduct".

## **3 COMMITMENTS AND MONITORING**

- 3.1 Nyfosa shall contribute to driving progress toward a sustainable society. Nyfosa shall observe the precautionary principle and treat statutory requirements as minimum standards, continuously striving for improvements to promote sustainable development.
- 3.2 To achieve successful sustainability work, Nyfosa shall:
- a) guide its operations in line with:

- i) the 2030 Agenda, the UN Sustainable Development Goals;
    - ii) the Ten Principles of the UN Global Compact; strive to reduce carbon emissions and counteract global warming;
  - b) continuously enhance competence in sustainability through training and communication of sustainability issues within the Company; and
  - c) regularly follow up, report, and improve sustainability efforts.
- 3.3 Nyfosa's sustainability efforts shall be based on established targets that are monitored and reported annually in the Company's sustainability report. The Board of Directors sets these targets, which may be reformulated if requirements and guidelines change over time.

## **4 ENVIRONMENTAL RESPONSIBILITY**

Environmental responsibility involves minimizing the environmental impact from properties and premises during the management phase. It also entails managing future climate risks by working proactively to minimize negative impacts both on and from the Company.

### **4.1 Acquisitions**

In connection with property acquisitions, environmental assessments shall be conducted of both land and buildings to identify potential environmental risks and to evaluate measures that may be implemented to address environmental liabilities and reduce the environmental impact of the properties. Furthermore, data shall be gathered regarding how the property can contribute to the Company's current sustainability targets, such as potential energy-saving measures or renewable energy transitions.

### **4.2 Management**

- 4.2.1 Project developments shall consistently consider sustainability aspects like work environment, waste management, material choice, and energy-saving measures to reduce the Company's carbon footprint. During project development, the Company's sustainability targets shall be considered in the decision processes, and project proposals shall, to the extent possible, be linked to relevant sustainability targets. If the project is a property investment aimed at meeting a sustainability target, the project's climate footprint must be weighed against the benefits of the investment. For example, the carbon emissions generated by the replacement of a ventilation unit should be compared with the energy savings and reduced carbon emissions achieved by such replacement.
- 4.2.2 In the management and development of properties, Nyfosa's carbon footprint shall be considered, and local suppliers shall be given priority. Suppliers engaged for major projects must confirm compliance with Nyfosa's Supplier Code of Conduct.
- 4.2.3 Nyfosa shall only purchase renewable electricity and preferably renewable district heating, continuously exploring opportunities for renewable energy investments and minimizing resource use.

### **4.3 Environmental Policy**

The environmental policy shall guide ongoing management, stating the Company shall:

- a) actively work with energy optimization in Nyfosa's buildings and premises;
- b) be aware of the properties' environmental risks, liabilities, and climate risks, and develop sustainable solutions when measures are implemented;

- c) cooperate with tenants to ensure a healthy indoor environment;
- d) carry out environmentally adapted reconstructions;
- e) impose environmental and sustainability requirements on Nyfosa's suppliers; and
- f) enhance competence and awareness regarding environment and sustainability among Nyfosa's employees.

## **5 SOCIAL RESPONSIBILITY**

5.1 Social responsibility refers to the impact of the Company's operations on people within and around the Company. It entails contributing to the development of a society that places people at the centre, creating conditions for good health and quality of life, and reducing unjust inequalities.

5.2 For the Company, social responsibility means engagement in the communities where the Company operates including tenants, visitors, and residents in those locations. Social sustainability entails safeguarding the Company's employees, imposing requirements on suppliers and business partners, and ensuring fair working and delivery conditions.

### **5.3 Employees**

#### **5.3.1 *Corporate Culture and Employees***

Nyfosa shall provide a creative, open, and stimulating work environment with emphasis on participation and personal development. All employees shall be familiar with and understand the Company's targets and strategy.

#### **5.3.2 *Competence Development***

For Nyfosa, a clear focus on competence is the path to a sustainably successful business.

The Company shall actively promote competence development and resource management. An essential element is to enable employees to grow within the organization with progressively increased responsibility.

#### **5.3.3 *Work Environment***

Nyfosa shall promote health and create a safe and secure environment for all employees. occupational health and safety legislation shall be applied, as well as other regulations and requirements applicable to the Company. Work environment efforts shall be carried out both as a natural part of daily operations and as a systematic process with regular workplace assessments and follow-up of decided measures.

As part of preventing ill health, Nyfosa shall provide wellness allowances, regular health examinations, and health insurance.

#### **5.3.4 *Equality and Non-discrimination***

Equality shall be an integral part of Nyfosa's operations, The conditions, rights, and opportunities for development of women and men shall be equal throughout the Group and not dependent on gender.

Each individual shall be assessed strictly on the basis of merit.

At Nyfosa, all employees, consultants, and tenants shall be treated with respect, and no one shall be subjected to harassment, discrimination, or discomfort based on gender, gender

identity or expression, ethnic origin, religion or other belief, disability, sexual orientation, or age. Nyfosa does not tolerate any form of harassment or bullying.

**5.3.5 Recruitment**

Nyfosa shall strive for gender balance in the number of women and men in the workplace. Nyfosa shall take gender underrepresentation into account where candidates have equal merits and ensure that interviews are conducted by both male and female employees.

**5.3.6 Parenthood & Work-life Balance**

Nyfosa shall in various ways facilitate the ability of both women and men to combine parenthood with working life. This applies to working hours, staff conferences, meetings, training, and travel. Of particular importance is that both women and men are given full opportunity to take parental leave or time off to care for children.

**5.3.7 Employee Code of Conduct**

Nyfosa has implemented an “Employee Code of Conduct”. The Code clarifies the values and principles that govern Nyfosa and provides employees with guidance on the laws and regulations that the Company and its employees are obligated to comply with.

**5.4 Tenants**

5.4.1 Nyfosa’s tenants shall always be able to rely on Nyfosa’s properties providing an environment that is safe, accessible, and healthy to occupy.

5.4.2 Nyfosa shall establish, maintain, and develop effective routines and working methods for managing safety in and around the buildings on Nyfosa’s properties, complying with applicable regulatory requirements, which includes regular inspections of fire and evacuation installations, as well as training and drills.

**5.5 Suppliers**

5.5.1 Nyfosa’s major suppliers must confirm adherence to the Company’s Supplier Code of Conduct. By confirming adherence, suppliers assure that working conditions within companies supplying goods and services to Nyfosa are safe, their employees are treated with respect and dignity, operations are conducted in an environmentally conscious manner, and high ethical standards and loyalty are upheld in business practices.

5.5.2 The Supplier Code of Conduct shall address working conditions within the supplier’s organization and its subcontractors.

**6 ECONOMIC RESPONSIBILITY**

6.1 Economic responsibility ensures a long-term, resource-efficient, profitable operation. Profitability is essential for a company to be able to continue its operations and provide opportunities for investments that develop the business and adapt to changing needs of

tenants and customers. Without economic sustainability, it is not possible to assume long-term social and environmental responsibility.

- 6.2 For the Company, economic sustainability means managing resources prudently. Investments in properties shall be utilized as efficiently and for as long as possible.

## **7 GOVERNANCE**

Sound business ethics and trustworthy relationships are important cornerstones, both internally and in the Company's interactions with external parties.

### **7.1 Business Ethics and Employee Code of Conduct**

- 7.1.1 Nyfosa shall be a reliable partner in all business relations, meaning that commitments and agreements shall be fulfilled. Nyfosa shall always strive to act with credibility, honesty, and transparency. Tenants, partners, and counterparties shall be treated with respect. Service shall be personal and trustworthy.

- 7.1.2 Nyfosa shall comply with the laws and regulations applicable to its operations. Employees are expected to be well-acquainted with the rules relevant to their areas of responsibilities and daily work. As guidance, the Company has implemented an "Employee Code of Conduct," which employees are obliged to follow. The Code includes, inter alia, principles and guidelines aimed at promoting and maintaining a healthy work environment and sound business ethics, as well as preventing corruption, money laundering, and conflicts of interest.

### **7.2 Whistleblower Reporting Channel**

- 7.2.1 The Company shall always be operated in accordance with ethical guidelines and sound business principles, as well as in compliance with applicable laws and regulations. However, irregularities may occur in all types of companies, and the Company encourages all individuals working within the Company (e.g., employees, interns, temporary staff, and consultants) to report suspected irregularities observed in the business. To facilitate this, an internal reporting channel and procedures have been established to enable the Company to receive and manage reports of suspected irregularities. The Company also encourages others who come into contact with it in a work-related context, such as business partners, tenants, and suppliers, to use the internal reporting channel if they suspect irregularities within the Company's operations.

- 7.2.2 Reporting through the internal reporting channel is made via the following website: <https://report.whistleb.com/en/nyfosa> and can be done completely anonymously. Allegations of irregularities are managed and investigated in accordance with the Company's whistleblower guidelines, as adopted and amended by the Company from time to time, which are available on the Company's intranet and website, [www.nyfosa.se](http://www.nyfosa.se).

## **8 VALIDITY AND UPDATES**

This policy shall be approved by the Board of Directors annually or more frequently when required.