

Code of Conduct



**Swedavia
Airports**

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Introduction

Our shared core values are reliable, engaged, innovative and welcoming.

This Code of Conduct comprises Swedavia's ethical guidelines, which supplement and develop our values and ethical approach. It is clearly based on our purpose – *Together we enable people to meet* – and specifies how we should act in order to meet the requirements for our operations in a way that we are proud of.



Swedavia's Code of Conduct

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Our efforts going forward need strength to be realised. So it is important to us that everyone at Swedavia is involved. We need clear objectives and targets, a vision to strive for and tools to get us there. With a consistent approach to serving our customers and others, we have a chance to develop and achieve our goals – a journey that we all make together.

The Code of Conduct applies to all employees regardless of their job, and it is every leader's responsibility to make these guidelines known and ensure that they are followed. All employees at Swedavia always have a personal responsibility to study and follow our Code of Conduct. The Code also applies to suppliers who carry out assignments on Swedavia's behalf or could be identified as part of Swedavia in their operations. We work to ensure that our customers and partners are familiar with and comply with Swedavia's Code of Conduct, and all leaders are responsible for making people aware of these guidelines and ensuring that they are complied with. All employees at Swedavia are always responsible for being familiar with and complying with our Code of Conduct.

Swedavia is a State-owned company that owns, operates and develops airports across Sweden. International guidelines, the UN 2030 Agenda for Sustainable Development and its global goals for sustainable development guide our operations. We support and run our operations in accordance with the ten principles for responsible business in the UN Global Compact and with the UN Convention on the Rights of the Child. The UN Global Compact is based on the UN Declaration of Human Rights, the International Labour Organization's Convention on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the UN Convention against Corruption. It is a given that we comply with laws, statutes, international conventions and agreements that concern our operations.

At Swedavia, ethical conduct entails more than avoiding legal violations. At Swedavia, we are concerned about how we behave towards one another and also how we conduct ourselves in business contexts with customers, suppliers and other stakeholders. This also applies to others in the world around us. Swedavia works actively with ethical and social issues that we believe support the foundation of a modern, sustainable company.

To summarise, I see all of this as an obvious, essential requirement for us to enhance our brand so that we are a company in society that people view positively and that we as employees are proud of.

Jonas Abrahamsson,
President and CEO, Swedavia

Swedavia's role in society

Swedavia has a clear mission and an important role in Sweden's development. We shall make air travel and cargo transport as accessible, efficient and attractive as possible, and thus create the access that Sweden needs to facilitate travel, business and meetings. We also work actively to transform the air transport industry to make it sustainable. In this way, we help to enhance Swedish competitiveness and promote growth in an increasingly globalised world.

For us, it is a given that all laws are complied with in a responsible and engaged manner. And since our operations affect our surroundings in many ways, it is important that we think and act as "a good neighbor". This means, for example, that we are always interested in listening, conducting a dialogue and working together with those affected or who somehow have an interest in our operations – no matter whether this involves individuals, companies or government authorities. We make sure that our stakeholders have access to relevant information at as early a stage as possible and that we actively contribute to a constructive dialogue. In that way, we create opportunities for our airports to develop in mutual understanding with those around us.

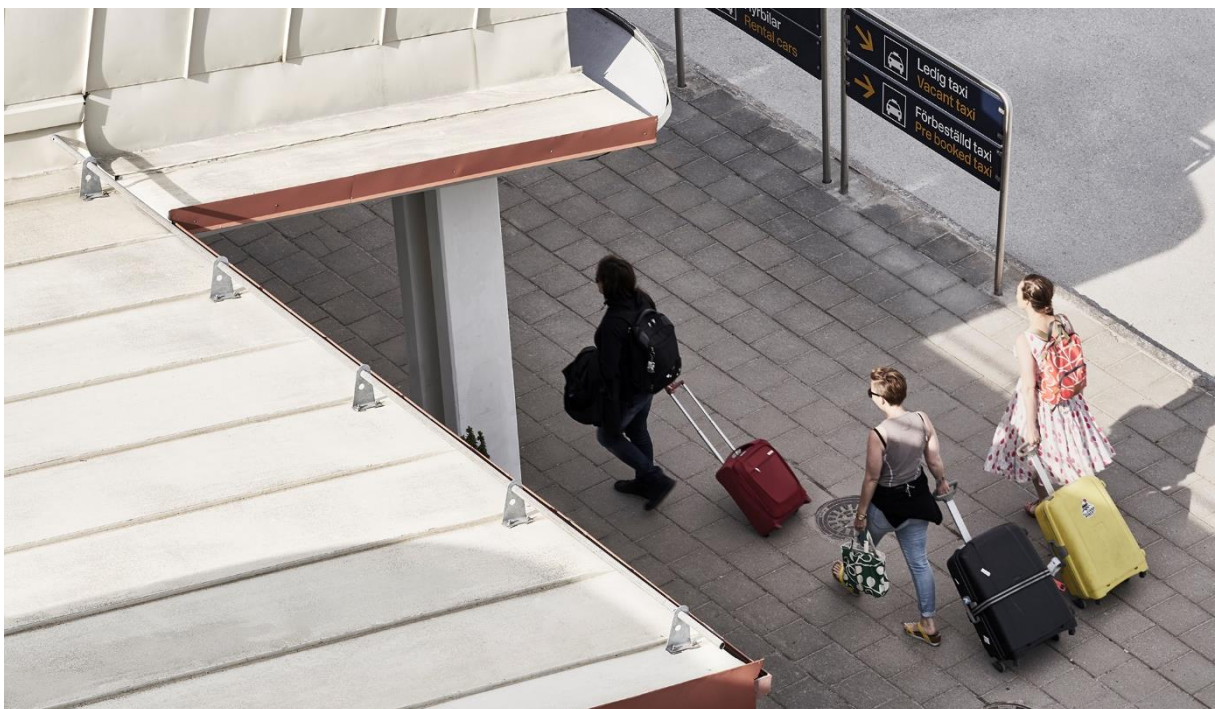
We ensure the communication of accurate information to our shareholder, significant ownership influence and effective work by Swedavia's executive management and Board of Directors. We also have internal control functions with stringent rules and principles for the reporting of financial information that we respect and comply with.

Our customers

It is important to Swedavia that our customers always feel welcome at our airports, regardless of the reason for their visit. Our airports are a hub for people, goods and services. They create opportunities for meetings between people, the development of companies and the exchange of culture and knowledge. We have three customer groups – passengers, airlines and tenants – which all have different needs and desires, both as a group and as individual customers. Our work with customer journeys and improving them based on this work is the basis for meeting these needs – in other words, working with a focus on the customer.

Our customer service shall always be guided by our values. We want our customers to feel our sense of engagement and that we care. We do this by involving customers and offering services and solutions that make the customer's situation easier, regardless of the customer group. We want them to view Swedavia as a reliable company. A reliable company or business partner will always have an easier time being accepted by customers. So it is important for us to say what we do and do what we say, and not promise solutions with more content than we can deliver.

Our services and products shall be characterised by a high customer value.



Business ethics at Swedavia

The framework for Swedavia's business ethics consists, naturally, of the laws and statutes that the company must comply with – but it is also important to us that we set higher demands on ourselves and our suppliers than are legally required. It is important for us at Swedavia that work each day always proceeds from our core values: being Reliable, Engaged, Innovative and Welcoming.

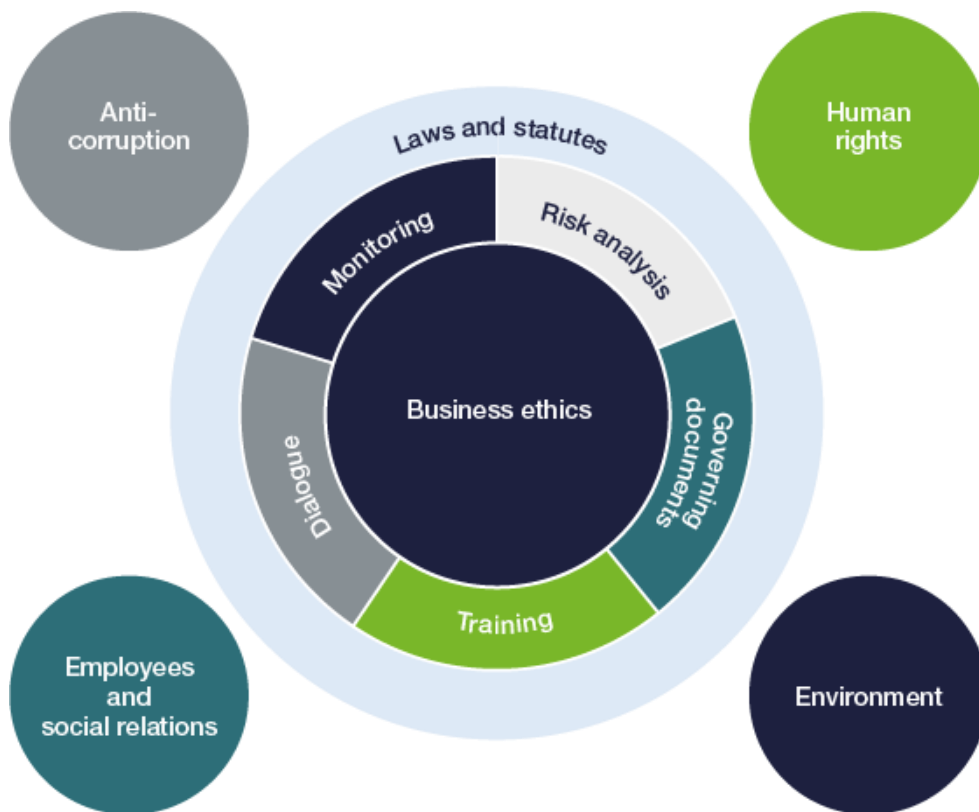
The core principle for us is to work together with one another and with our suppliers, partners and customers and always maintain good business ethics. In Swedavia's Annual and Sustainability Report, there are four areas which together constitute what is known as our Sustainability Report. At Swedavia, we have decided that good business ethics at Swedavia consist of us maintaining proper conduct in the four areas outlined in our sustainability report: Anti-corruption, Human Rights, Employees and Social Relations, and Environment.

So it is especially important for us at Swedavia to work with these areas in order to be a modern, reliable and sustainable company. We take it for granted that our suppliers, partners and customers will also safeguard and work with these issues.

There is continuous monitoring of how we work in these areas, with the results also reported in our Annual and Sustainability Report. By working actively and in a structured way with these areas, we thus also integrate the Sustainability Report in Swedavia's business ethics and in our Code of Conduct.

Our business ethics constitute our internal moral compass and are reflected in our continuous work with anti-corruption, human rights, employees and social relations, and environment. For each of these four areas, we work according to the process outlined below.

We carry out a comprehensive risk analysis together with the Risk Manager at Swedavia and also prepare measures to mitigate risks. We make sure that we have clear governing documents that are reviewed and updated each year. We conduct training for employees at Swedavia and offer training to our suppliers. We work with advice services, make sure we maintain an active dialogue within the company and create opportunities for follow-up.



Our goal is for all employees at Swedavia to be trained in the four areas and be part of our dialogue on these issues. So it is also important that we highlight each of the four areas in our Code of Conduct.

Anti-corruption

Swedavia wants to be a trustworthy business partner that maintains long-term business relations. Honesty and openness are thus integral to our interaction and relations with business partners, and we honour the commitments we have made. Our business partners should feel that these are important conditions to ensure that the business we conduct together will be as successful as possible.

Swedavia's business decisions in every case are based on objective grounds and criteria. We always comply with the safety and environmental requirements set. We respect and comply with laws, agreements and other statutes that provide the framework for our operations. All business transactions are made based on professionalism, sound ethical principles and a high level of integrity, and we also expect this of our business partners.

We are well aware that things which are not prohibited can still be inappropriate. So it is important that we maintain a good dialogue within the company. If there are any doubts, you can always ask for advice from your immediate supervisor, but you are ultimately the person responsible.

Our Code of Conduct is one of the governing documents in our work with anti-corruption. Swedavia has also adopted a special Bribery Policy as well as Guidelines for External Business Entertainment, which are governing documents that everyone at Swedavia must comply with. The Guidelines include detailed instructions for how we should conduct ourselves with external contacts as Swedavia employees. The Bribery Policy also specifies that Swedavia's employees must comply with the Swedish Anti-Corruption Institute's Code on Gifts, Rewards and Other Benefits (the Code of Business Conduct). Swedavia also supports the Swedish Joint Initiative to Prevent Bribery and Corruption between suppliers and clients in the publicly funded construction and real estate sector. For employees at Swedavia that work with the construction and real estate sector, this provides additional practical help to do the right thing with examples and ethical guidelines. All of these documents are available on Swedavia's intranet.

Corruption and inappropriate influence

Swedavia vigorously opposes all kinds of corruption. You may never offer or receive benefits or rewards that could be interpreted in any way as business or personal benefits for you or others. Swedavia also opposes any kind of attempt by suppliers and partners to exert an inappropriate influence on our leaders and employees. No employee or leader may accept any type of remuneration that can be seen as corruption – the giving or taking of bribes. We also refrain from acts that can be seen as attempts to exert inappropriate influence on the recipient's decision.

Gifts and business entertainment

All business entertainment is in accordance with established business practice and the laws that apply in the markets we work in. We always carefully consider and are very restrictive about offering or receiving gifts and/or benefits or allowing ourselves to accept business entertainment. Ask your immediate supervisor for advice when you are uncertain and get support from the guidelines mentioned above. However, you bear responsibility for the decision you make.

Private interests, conflicts of interest and agreements with related parties

Swedavia's employees may not take advantage of business opportunities, either for themselves or for the benefit of people close to them, that actually belong to Swedavia. It is also self-evident that employees cannot use information, property or their position for personal gain. People who are involved, directly or indirectly, in contacts with tenderers, suppliers or customers may not have private business or transactions with them.

Every employee must refrain from situations in which personal interests could be in conflict with Swedavia's best interests.

Side-line activities, other assignments or involvement in external operations

Engagement through various side-line activities is considered to be something positive. However, this may not affect work adversely or conflict with Swedavia's business interests. As an employee at Swedavia, obviously you may not have another job or carry out other work when you work at Swedavia without getting written approval in advance from your immediate supervisor. The same holds for Board duties and the giving of advice to – or through the ownership of – customers, suppliers, partners or competing operations.

Whistleblower function

Swedavia has a whistleblower function that gives all employees at Swedavia – as well as customers, suppliers and other stakeholders connected to Swedavia – the opportunity to report their suspicion of any irregularities that could have serious consequences for Swedavia. The decision to establish a whistleblower function was decided by Swedavia's Board of Directors. To protect your anonymity, the reporting channel is provided by an external, independent party. The reporting channel is encrypted and password-protected. You never have to provide your identity if you do not want to. You will find more information about this on Swedavia's intranet and on our external homepage.



Human rights

Running airports is a complicated operation that could potentially affect the human rights of many different stakeholders. Swedavia respects all internationally recognised human rights and works actively to implement the UN's Guiding Principles for Business and Human Rights in the Group's operations. This means that Swedavia supports the principle of not causing, contributing to or through Swedavia's operations being associated with adverse human rights impacts.

Swedavia's fundamental assumption is that all people are of equal value. This means that Swedavia respects the personal dignity, integrity and rights of all people. All people receive equal treatment and equal opportunities, regardless of their age, gender, transgender identity or expression, ethnic identity, religion or other belief, functional impairment, sexual preference, political conviction or social status. All of Swedavia's employees are free to join any association or organisation.

Swedavia works for sustainable development and sees how employees from a variety of backgrounds provide operations/the Group with human resources and business benefits. Swedavia's objective is to achieve gender equality and have at least the same percentage of employees with a foreign background as reflected in Sweden's demographics.

We are convinced that diversity, gender equality and an inclusive culture contribute to increased creativity and our ability to develop and thus to the company's competitiveness and attractiveness.

Our relation to one another is characterised by mutual respect and a shared sense of humanity. Each and every one of us can expect to be respected for who we are. No form of discrimination or harassment is allowed, and everyone should feel welcome at Swedavia.

As a company that takes responsibility, Swedavia carries out continuous work to proactively identify and manage risks associated with human rights throughout the value chain. As part of our work to ensure social responsibility in our value chain, we require that our suppliers work actively with their suppliers and sub-suppliers to ensure that these operations respect and support internationally recognised human rights and take measures to avoid causing, contributing to or being associated with adverse human rights impacts.

Employees and social relations

Our employees are Swedavia's most valuable asset. It is through our employees' engagement, reliability, motivation and competence that we create the atmosphere that employees and customers feel good in. Our employees enable operations to develop, and it is through them that Swedavia can make a difference.

Every employee is an ambassador who acts in accordance with our values, so that trust in Swedavia is strengthened. This also applies outside business hours when we meet other people. We are especially aware of this when we represent Swedavia in different forums and contexts, when we wear clothes or travel in vehicles that feature Swedavia's logo. This likewise applies when we act in digital environments, for instance, when we take part in social media and discussion forums, write e-mails, visit websites, interact with others online etc.

Confidentiality

All employees at Swedavia familiarise themselves with the content of Swedavia's confidentiality policy in conjunction with the signing of their employment agreement. We never comment on or provide data that can provide outsiders with access to sensitive information. We are cautious when we discuss internal business or anything else that concerns Swedavia to prevent outsiders from overhearing by mistake. This confidentiality also remains in effect once a person's employment has ended or their agreement with Swedavia has expired.

Tangible assets

Swedavia has a large number of workplace facilities in our operations. Our goal is to give every employee the tools they need, in the form of equipment and information required in their daily work. We protect these assets to prevent unnecessary wear and tear, damage and other losses. Equipment and other assets may not be used for the personal benefit of employees.

Intangible assets

Intangible assets are important for Swedavia's operations and results. These can include special know-how, methods, concepts and ideas that we have developed and use in carrying out our professional duties. We also protect and manage these assets in Swedavia's interest. We likewise respect the intangible assets of others and shall not infringe such rights. Unless otherwise specified in laws or decisions by government authorities, we shall not make company secrets or other important information concerning Swedavia available to unauthorised persons before we have had a confidentiality agreement signed by each such individual. Intangible assets can quickly be spread and made available online through indiscreet formulations, for instance via social media. So we contemplate and think about how we express ourselves in these contexts.

IT assets

Swedavia's employees have access to IT equipment via e-mail, the internet and different applications in order to have access to the information services needed in their work. We are personally responsible for this IT equipment and its use. We never give out our identity or password to anyone. Nor do we use Swedavia's IT equipment and IT services to damage Swedavia or a third party.

Information

All information that guides our operations and decisions is operational information. We handle operational information with great care. We all take part in the work to ensure that this information is accessible, accurate and usable and that the right level of authorisation governs the protection of this information. If there is suspicion of a breach, unlawful handling or other incidents involving information, we report this in accordance with our incident reporting process.

Protection for personal integrity in the handling of personal data

Swedavia protects the integrity of our customers, partners and employees, and we are careful to comply with the regulations on data protection in effect. In order to protect the rights of its citizens, the EU has introduced a law, the General Data Protection Regulation (GDPR), which entails stronger protection for people whose personal data are handled and sets additional and more stringent requirements for companies and individuals who handle such personal data. GDPR stipulates, among other things, that "the protection of natural persons when processing personal data is a basic right".

In order for Swedavia to comply with GDPR, all employees must be familiar with the regulation and comply with the internal regulations established. All employees at Swedavia thus undergo training on this law, and there is information on the company's intranet and good opportunities for internal advice and dialogue on these issues.

About the workplace environment in particular

In all operations and all projects that Swedavia carries out, employee health and safety is a high priority. Concern about safety applies to all forms of workplace environments – no employee, consultant or contractor in Swedavia's operations should put their health or safety at risk at their place of work. Everyone must know about or have the opportunity to obtain information about legal requirements and other regulations and processes that concern their own tasks. All employees and other stakeholders in our operations are personally responsible for the shared workplace environment and people's health and safety. This responsibility also includes reporting incidents and risks to reinforce the company's work with preventive measures.

Swedavia works proactively to choose and collaborate with suppliers who share and apply Swedavia's approach to preventive work to safeguard the workplace environment.

Risks and protective measures

All employees, consultants and contractors shall have information about the risks involved in their work. Access to personal safety equipment shall be available and made use of. Training in handling and using protective equipment, vehicles and machinery is provided so that the equipment and machinery are handled properly. Maintenance and oversight ensure that the risk of injury and ill health are minimised. Together we strive for continuous improvement in the workplace environment to prevent any kind of injury or illness.

Victimisation, discrimination and retaliation

No form of victimisation, discrimination or retaliation is allowed in Swedavia's workplaces. Swedavia works systematically using a preventive approach on these issues by carrying out continuous work on mapping, analysis, remedies and monitoring.

Drugs and alcohol

The consumption of alcohol or drugs at work or consumption that risks affecting work is not allowed in any operations and is inconsonant with Swedavia's operations. To guarantee a safe workplace environment, it is taken for granted that people are sober at work and refrain from all non-medical use of narcotic substances, anabolic steroids or mind-altering substances. All employees and consultants take a drug test when they are first hired, and random drug tests are carried out in all operations.

Social media

Our engagement in social media spreads our message and enhances our brand. It also enhances the image of our company as open and accessible. As an employee, you are always an individual. However, your participation in social media affects not just your image but Swedavia's image. It is very important that you distinguish between when you participate in social media within the scope of your job and when you take part as a private individual. You are always personally responsible for whatever you publish on your own initiative regardless of whether it is published in your capacity as an employee or privately. Information that is to the detriment of Swedavia could constitute a violation of the employee's oath of loyalty in their employment agreement.

If you are uncertain about what you are entitled to do and what is allowed within the scope of your job, for instance, posting items that concern Swedavia, you should ask your immediate supervisor and also get support from Swedavia's guidelines concerning social media.





Environment

At Swedavia, we work actively to create a culture based on interest and engagement in how each and every one of us can help reduce our impact on the environment. Concern about the environment is integral to our operations and is taken into consideration in all decisions. We all obtain the knowledge needed in order to carry out our tasks in a way that reduces our environmental impact since we know that the environmental impact of aviation is of great importance to aviation's development.

We at Swedavia all strive to reduce the negative environmental impact of our airports and help in our work in order to achieve the environmental quality goal of "limited climate impact". We are aware of how we affect the environment. This knowledge means that we can work in a preventive manner to prevent any unnecessary impact on the environment and unnecessary risks to the environment. We have systematic checks on how our operations affect the environment, and we carry out the necessary surveys to see how we affect our surroundings. We also work to enable other companies and organisations at our airports to reduce their environmental impact. Our objective is to reduce greenhouse gas emissions and increase the share of sustainable aviation fuel used. At the end of 2020, we achieved our goal of zero tonnes of emissions of fossil carbon dioxide from our own airport operations. Going forward, it is just as important that we work further together to maintain zero emissions by continuing to work to make all our operations free from fossil carbon dioxide. We are now taking the next step and aim to make our airports completely fossil-free. That means we need to further involve and strengthen our collaboration with our suppliers and partners in order to collectively reduce emissions of greenhouse gases from the operations at our airports.

We work to achieve resource-efficient operations, reduce energy use and reduce atmospheric emissions and discharges to land and waterways. We run the operations at our airports in a way that benefits biological diversity. We work actively to reduce noise load and to ensure that the exposure experienced is considered acceptable relative to the social benefits of aviation. We ensure that we handle chemicals in a responsible manner and strive to replace chemicals that are hazardous to the environment with less toxic substances.

We minimise the generation of waste in a number of ways – first, by preventing the production of waste; second, by recycling products; and third, by recycling materials and the energy they contain. In the construction of new properties and the renovation of existing ones, we strive to make them energy-efficient and make sure that the materials and solutions chosen are sustainable. We shall improve our knowledge about the climate impact of large construction and civil engineering projects in order to ensure climate-smart future infrastructure.

One important contribution to sustainable development is that we set environmental requirements in the tender process for services and products. Through close collaboration with our suppliers, we can contribute to a better environment. Suppliers are expected to have a good understanding of the life cycle perspective and what the environmental impact of their own operations is.



Application and follow-up

The content of this Code of Conduct only has meaning if we together succeed in applying it in our everyday lives. This includes everyone, regardless of whether we are employees, consultants or suppliers to Swedavia. In addition to reading the text, we also need to talk to one another about what it means for us and our work. We therefore carry out dialogues on these issues on a regular basis, for example, through discussions based on different dilemmas at our workplace meetings.

As employees at Swedavia, the Code of Conduct in force at the time is a governing document that you sign when you are hired. For suppliers, Swedavia's Code of Conduct is part of their agreement with us. We expect everyone to comply with this Code of Conduct.

As employees, our shared engagement and our results-focused work are an essential requirement for Swedavia's development now and in the future.

So it is of utmost importance that we both understand and follow these guidelines. These formulations are predicated on trust in everyone's good judgement and common sense. In some situations, it can be difficult to figure out which action is right or wrong. Before we act in such situations, we should therefore think hard about what the consequences of our actions are and whether we can take responsibility for the consequences. As an employee, you are responsible. As a leader, you need to understand what these guidelines mean for your area of responsibility and for Swedavia as a whole. Take our guidelines into consideration when you make your plans for operations.

As a leader, you are also responsible for providing your employees with the right conditions for complying with the requirements in this document. Regarding these matters, it is especially important that you lead by being a good role model. Your employees will see how you comply in word and deed with the formulations as well as the spirit of our Code of Conduct. Talk to your employees and make sure that they also understand and work in a way that supports them.

Continue to keep this conversation about responsibility and ethics alive!