

## CODE OF CONDUCT SUPPLIER AND BUSINESS PARTNER 2026

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**APPROVED BY: PRESIDENT & CEO**

**SWECO AB**

**POLICY OWNER: LISA LAGERWALL, GENERAL COUNSEL**

**POLICY AUTHOR: FREDRIKA ANDERSSON BERGER, GROUP ETHICS COMPLIANCE OFFICER**

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## 1. Introduction and purpose

**Sweco's Supplier & Business Partner Code of Conduct establishes the standards we expect our suppliers and business partners to follow.**

At Sweco we are committed to integrating all aspects of sustainability, including ethics, human rights, and climate and environment, into our business operations. All Suppliers and Business Partners are expected to adhere to the same principles, in their own operations and, in turn, towards their suppliers and business partners.

Understanding and complying with this Supplier & Business Partner Code of Conduct is mandatory for everyone working for or in any other way providing products, services or works to Sweco. This includes Sweco's suppliers, sub-consultants, joint venture partners, consortium partners, and other business partners such as agents and business representatives. It is the Suppliers' and Business Partners' responsibility to ensure that their employees, relevant affiliated companies, subcontractors, and their affiliates, in all countries where they operate, are aware of the content of the Code and comply with its requirements.

Compliance with all applicable laws and regulations is required of Sweco as well as of Sweco's Suppliers and Business Partners. In the event of a conflict between applicable laws and the principles outlined in this Supplier and Business Partner Code of Conduct, the higher standard shall take precedence. Non-English versions of this Code of Conduct are merely translations.

## 2. Our company

Sweco's purpose is Transforming society together. It captures the essence of what we do and what sets Sweco apart from our competitors, namely our focus on collaborating closely with our clients, every day, project-by-project.

How we operate makes a difference. Therefore, it is important that all our Suppliers and Business Partners understand what kind of behaviour is required.

## 3. Human rights and work conditions

At Sweco we support global human rights and fair working conditions. Health and safety is a top priority and we have a zero-incident vision. We therefore require our Suppliers and Business Partners to:

- Comply with global human rights and fair working conditions, as well as relevant local laws and guidelines within health and safety;
- Recognise and support children's rights in business and society and not accept child labour or any other forms of exploitation of children, in their own operation or in their value chain;
- Not accept or employ any form of forced or bonded labour or illegal workers;

- Promote equal rights and opportunities of employees in the workplace regardless of their gender identity, age, ethnicity, religion or other belief, functional variation, sexual orientation or any other characteristic;
- Recognise that employees have the freedom to join, or not to join an employee association of free choice and to bargain collectively and individually in accordance with local laws and regulations;
- Have implemented processes to ensure that potential or actual impact on human rights and/or environment is identified, and steps are taken to mitigate or remediate harmful activities, if needed;
- Ensure a healthy and safe working environment, eliminate hazards, reduce risk and ensure that health and safety information, instruction, training and supervision is provided in a systematic way; and
- Continue to take actions to improve the understanding of human rights.

#### **4. Climate and Environment**

At Sweco we expect our Suppliers and Business Partners to have a thorough understanding of the environmental risks, impacts, and responsibilities associated with the products and services they provide. Suppliers and Business Partners should implement processes to mitigate these risks, with clear evidence of their application throughout all levels of the company.

Suppliers and Business Partners must ensure their operations comply with all applicable environmental legislation. This includes obtaining, maintaining, and adhering to all required environmental permits, approvals, and registrations as defined by the relevant authorities.

Suppliers and Business Partners should strive for continuous improvement in their environmental performance through practical measures and the adoption of leading practices wherever possible.

#### **5. Compliance and ethical business practices**

Sweco monitors and complies with laws, regulations, and other requirements applicable to operations in the countries where Sweco is active. We demand that our Suppliers and Business Partners to do the same. Our Supplier & Business Partner Code of Conduct sets out minimum requirements and applies to all Suppliers and Business Partners, irrespective of where they operate, or where the projects are executed.

##### **5.1 Integrity**

We require our Suppliers and Business Partners to operate their businesses professionally and autonomously, adhering to the standards established by all relevant international and national laws and regulations, while acknowledging that Sweco's demands might occasionally surpass these standards. At the very least, Sweco's Suppliers and Business Partners must conduct all aspects of their business with integrity, honesty, and fairness.

## **5.2 Conflicts of Interest**

Suppliers and business partners must avoid any situations which constitute conflicts of interests concerning personal activities, interests of close relatives or associates, a Supplier or Business Partner's own business activities with others, and their involvement with Sweco. Sweco must be informed immediately upon discovery of any conflict of interest.

## **5.3 Anti-corruption and bribery**

Suppliers and Business Partners must comply with all applicable anti-corruption laws. Bribery and any other form of corrupt business practice are prohibited. The direct or indirect offer, granting or acceptance of illegitimate benefits to generate, maintain or accelerate business is unacceptable. Suppliers and Business Partners must ensure that no such benefits are exchanged in their business.

We require our Suppliers and Business Partners to perform risk-based due diligence before engaging any sub-supplier and to ensure these third parties adhere to all relevant anti-corruption regulations.

## **5.4 Gifts and entertainment**

Suppliers and Business Partners are prohibited from offering any gifts, meals, entertainment, or anything of value to Sweco employees, clients, other third parties that could impact, or appear to impact, a Sweco employee's, a client's, or other third party's decision regarding business dealings or decision-making by the third party with the Supplier or Business Partner or Sweco.

Sweco employees or Supplier or Business Partner's employees are not allowed to accept gifts or hospitality if this may influence or appear to influence a business decision.

## **5.5 Accurate books and records and tax compliance**

Maintaining precise books and records, along with honestly declaring all necessary taxes and duties, is essential for operating a lawful and transparent business sustainably. Sweco expects our Suppliers and Business Partners to demonstrate the utmost diligence in this regard.

## **5.6 Data Protection, Information Security, and AI**

Suppliers and Business Partners must comply with all applicable Data Privacy and Data Protection laws in collecting, processing, storing or otherwise handling personal data of any individuals, including, without limitation, their own employees, and employees of their clients, suppliers and business partners. Suppliers and Business Partners must ensure a high level of data and information security in all their activities and information and data processing to prevent data loss, alteration, unauthorised access, destruction, or similar issues.

In addition, Suppliers and Business Partners must commit to using AI responsibly, in accordance with the principles set out in this Code and applicable AI legislation.

## 5.7 Trade restrictions and sanctions

Suppliers and Business Partners must conduct their business in accordance with all applicable trade compliance regulations, including trade restrictions, sanctions, and export control.

## 5.8 Fair competition

We require our Suppliers and Business Partners to adhere to both national and international antitrust and competition regulations. It is imperative that Sweco's Suppliers and Business Partners avoid engaging in any unlawful agreements with competitors, whether directly or indirectly, and refrain from sharing information sensitive to competition.

## 6. Grievance channels and whistleblowing

External parties such as Suppliers' and Business Partners' workforce, civil society organisations and human rights defenders, trade unions and other workers' representatives, and civil society organisations, can report suspected violations of this Supplier and Business Partner Code of Conduct through Sweco Ethics Line, which is available on Sweco's website.

Sweco's Suppliers and Business Partners must protect their workforce from any form of retaliation for reporting suspected or actual violations. Sweco expects their Suppliers and Business Partners to cascade adequate information on adhering to the Supplier and Business Partner Code of Conduct and how to make use of whistleblowing procedures.

## 7. Documentation, inspections, reporting, and Consequences of non-compliance

To ensure and demonstrate compliance with this Supplier and Business Partner Code of Conduct, Suppliers and Business Partners will:

- Comply with all applicable regulations and laws regarding public reporting or disclosure on human rights and environmental due diligence, including laws requiring public disclosures on due diligence on modern slavery and child labour across their value chain,
- Create and maintain relevant documentation and provide supporting documentation to Sweco upon request,
- Report to Sweco without undue delay in writing any identified risks to and violations of the principles outlined in this Supplier and Business Partner Code of Conduct and take appropriate corrective actions to prevent, end or mitigate the risk or violation.

To verify Suppliers' and Business Partners' compliance, Sweco reserves the right to audit and inspect Suppliers' and Business Partners' operations and facilities and interview their employees, upon reasonable notice, with the Suppliers' or Business Partners' consent. Such consent shall not be unreasonably withheld.

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If a Supplier or Business Partner fails to comply with the requirements set forth in this Supplier and Business Partner Code of Conduct, the Supplier or Business Partner must take appropriate action to remedy the breach and prevent recurrence of such a breach in the future. Sweco reserves the right to suspend or terminate the business relationship with any Supplier or Business Partner which materially deviates from or violates this Supplier and Business Partner Code of Conduct.

## 8. List of appendices

Not applicable.

### Document change log

DATE	VERSION	COMMENT ON MATERIAL CHANGES
2024-12-13	1	New policy
2025-12-11	1.1	Annual review + editorial changes