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# Code of Conduct for Business Partners

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# SVEASKOG

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## 1. Introduction

### 1.1 Background and purpose

Sveaskog's Business Partners (e.g. contractors, suppliers, customers and partners) are expected to act responsibly and comply with international guidelines on the environment, working conditions, anti-corruption, business ethics and human rights.

This Code of Conduct describes how Business Partners must act in order to contribute to sustainable value creation. Sveaskog values responsibility, curiosity and courage and wants to build solid relationships based on these values.

Business Partners must:

- Ensure compliance with the Code within their own organisation.
- Ensure that their suppliers and subcontractors commit in writing to comply with the same requirements that apply to Business Partners in this Code of Conduct and ensure compliance by suppliers and subcontractors.
- In the event of non-compliance with the Code of Conduct, quickly investigate the cause, take action and inform Sveaskog.

### 1.2 Scope and area of application

#### Consequences of non-compliance

Business Partners must promptly manage and remedy non-compliance with the Code of Conduct. In the event of serious or repeated breaches, or if the necessary information is not provided, Sveaskog may terminate the partnership.

#### Due diligence and transparency

Sveaskog and its Business Partners must work together to foster transparency and accountability. Business Partners must, in all contexts and for all requirements, pay particular attention to risks affecting vulnerable groups. Business Partners are therefore expected to allow Sveaskog, or a third party approved by Sveaskog, to conduct audits and assessments of operations linked to this Code of Conduct in order to follow up on the requirements set. This includes, but is not limited to, traceability assessments, visits to business partner sites and supplier relationships with subcontractors. If necessary, Business Partners may request that the affected parties who are involved in the audit sign a confidentiality agreement protecting the information related to the audit.

### 1.3 Definitions

#### *HORIZONTAL INTERNATIONAL GUIDELINES*

Sveaskog's Code of Conduct for Business Partners is based on the following international guidelines:

#### **UN Global Compact**

The UN Global Compact is the global business community's initiative for sustainable business practices. Sveaskog supports and acts on the basis of the initiative's Ten Principles for human rights, labour and employment conditions, the environment and anti-corruption.

Find out more at [www.unglobalcompact.org](http://www.unglobalcompact.org)

## **UN Guiding Principles on Business and Human Rights**

Sveaskog follows the recommendation unanimously adopted by the UN Human Rights Council in 2011. The recommendation is aimed at all states and all companies and takes the form of Guiding Principles that address:

- the state duty to protect individuals against human rights abuse by private actors, including business enterprises
- the corporate responsibility to respect human rights
- access to effective remedy for those who consider themselves victims of human rights abuse.

Find out more at [www.regeringen.se](http://www.regeringen.se)

## **OECD Guidelines for Multinational Enterprises**

Countries adhering to the OECD Guidelines encourage companies to follow the Guidelines and contribute to economic, environmental and social development, as well as to minimising the inconvenience that their various operations may cause. Governments work on this with businesses, trade unions and non-governmental organisations. The Swedish state and Sveaskog follow the OECD guidelines.

Find out more at [www.oecd.org](http://www.oecd.org)

## **ILO Declaration on Fundamental Principles and Rights at Work**

The ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998 and amended in 2022, is an expression of commitment by governments, employers' and workers' organisations to uphold basic human values – values that are vital to our social and economic lives. It affirms the obligations and commitments that are inherent in membership of the ILO, namely:

- freedom of association and the effective recognition of the right to collective bargaining;
- the elimination of all forms of forced or compulsory labour;
- the effective abolition of child labour;
- the elimination of discrimination in respect of employment and occupation; and
- a safe and healthy working environment.

Find out more at [www.ilo.org](http://www.ilo.org)

## **2. Human rights**

Business Partners must respect and actively uphold internationally recognised human rights.

### **Indigenous peoples**

Business Partners must respect the rights and interests of indigenous peoples, in particular their connection to land and natural resources. Sveaskog requires Business Partners to carry out consultation processes in relation to each activity. Evidence must be presented to Sveaskog on request.

### **Community engagement**

Business Partners must respect the rights and needs of impacted communities, especially vulnerable groups, both in day-to-day operations and in the event of major changes. Dialogue with stakeholders and government agencies must be open, inclusive and fair.

### **Child labour and young workers**

All forms of child labour are unacceptable to Sveaskog. Business Partners must actively combat all forms of child labour in their operations and supply chain in line with international conventions on the elimination of child labour and on children's rights. Work that is hazardous, harmful or interferes with schooling may not occur. Young workers under the age of 18 must never perform heavy or harmful work or hazardous tasks, such as night work. All applicable laws, ordinances, regulations, rules and collective agreements must be complied with.

### **Modern slavery and forced labour**

All forms of forced labour are unacceptable to Sveaskog. Business Partners may not engage in or benefit from modern slavery or forced labour, such as debt bondage, involuntary prison labour, slavery, human trafficking or work under threat. All work must be voluntary, and workers must have the right to freely enter and leave employment. Identity documents may not be confiscated and freedom of movement may not be restricted.

### **Conflict-affected and high-risk areas**

Business Partners must assess whether their business or supply chain operates in conflict-affected or high-risk areas with regard to human rights and environmental aspects and, if necessary, undertake enhanced due diligence measures in accordance with the EU Conflict Minerals Regulation (Regulation (EU) 2017/821). Business Partners must not contribute to the financing of armed groups through trade in goods or services. When operating in high-risk areas, particular attention must be paid to identifying and managing human rights and environmental risks. Business Partners must respect the rights of human rights and environmental defenders and not inhibit civil society or fundamental rights and freedoms.

Business Partners must identify any use of high-risk minerals in their operations and supply chain, and ensure traceability to the origin or place of processing under the EU Conflict Minerals Regulation (Regulation (EU) 2017/821). Business Partners must take appropriate measures to ensure that risks associated with high-risk minerals are identified and that appropriate prevention and mitigation measures are implemented throughout the supply chain. Business Partners are encouraged to reduce the use of high-risk minerals or replace them wherever possible. The requirements apply in particular to Business Partners supplying products that entail a risk of conflict minerals, such as electronic components, batteries or other metal machined products.

### **Working hours**

Business Partners must comply with international standards such as the ILO Conventions regulating occupational health and safety (working environment), working hours and working conditions. Business Partners must also comply with the applicable laws, ordinances, regulations, rules and collective agreements on working hours and overtime, and ensure that the work does not cause physical or psychological harm. No worker may be penalised or subject to reprisals for refusing overtime.

**Salaries, leave and benefits**

Business Partners must comply with statutory minimum wages and combat unjustified differences in pay. Overtime must be compensated by means of overtime pay. All work must be carried out under recognised forms of employment.

**Working environment and health**

Business Partners must provide a safe and healthy working environment free from violence, threats and harassment. Risks must be managed systematically, and health and safety training must be provided regularly. Protective measures must follow the principle of first eliminating risks, then implementing technical and administrative solutions, and finally using personal protective equipment.

**Freedom of association and collective bargaining**

Business Partners must respect the right of all workers to freely associate, organise and engage in collective bargaining. Where applicable laws, ordinances, regulations and rules restrict these rights, alternative forms of worker representation must be authorised.

**Diversity, equity and discrimination**

Business Partners must promote diversity, equity and inclusion, and combat all forms of discrimination. Harassment in any form is unacceptable and must be addressed by means of clear procedures and encouragement to report.

**Complaints and redress mechanisms**

Business Partners must provide staff and impacted parties with accessible channels for complaint. There must be a process for managing and following up on any human rights abuse reported and other relevant issues.

### **3. Environmental sustainability**

Business Partners must conduct their business in a proactive and responsible manner in relation to the environment and apply the precautionary principle to reduce environmental risks in both their own operations and the supply chain.

**Environmental protection**

Business Partners must avoid, minimise and reduce waste, emissions and negative environmental impacts, and use resources efficiently and sustainably. Hazardous substances must be managed responsibly and replaced wherever possible. Business Partners must not adversely impact local communities' access to clean water, air or soil. Compensation and restoration measures must be taken where necessary, and the best available technology must be used to minimise negative environmental impacts. Business Partners must comply with applicable internationally agreed environmental standards, environmental legislation, ordinances, regulations and rules, and hold the necessary permits and licences.

### **4. Business ethics**

Business Partners must conduct their business in accordance with internationally agreed business ethics standards and comply with applicable business integrity legislation, ordinances and regulations.

### **Corruption and financial crime**

Business Partners must comply in all respects with all applicable anti-corruption laws and regulations, and otherwise promote good business ethics and engage in proactive anti-corruption measures. Business Partners and their employees must not accept or provide undue benefits, including cash, leisure trips or other undue benefits.

Sveaskog's Business Partners must not, when fulfilling obligations as part of their assignment for the company, engage in or be complicit in other crimes, such as breach of trust, fraud, swindling, theft or other crimes against property. Tax evasion, tax avoidance and the use of tax havens must be actively discouraged.

### **Money laundering**

Business Partners must actively prevent their operations from being used for money laundering or terrorist financing purposes and ensure that business transactions are not used to conceal illegally acquired funds. Financial records must be kept in accordance with applicable laws, ordinances, regulations and rules. When trading with high-risk countries, checks must be made against the EU list of high-risk third countries.

### **EU list of high-risk third countries (June 2025) – anti-money laundering**

Business Partners must apply more stringent checks to transactions with these countries, including enhanced customer due diligence and assessment of the origin of funds.

### **Export control and sanctions**

Business Partners must comply with applicable export restriction and export control regulations and all applicable national and international rules regarding economic sanctions, including but not limited to economic sanctions imposed by the EU and the UN. Business Partners are also not permitted to take any action to improperly circumvent or assist in the circumvention of such export restrictions, export controls or economic sanctions. In the event of any suspected interaction with sanctioned parties, Sveaskog must be informed immediately.

### **Conflicts of interest**

Business Partners must actively seek to avoid conflicts of interest. These exist when an individual's interests conflict with those of the Business Partner and/or Sveaskog. If there is reason to assume that such a conflict of interest exists, the Business Partner must inform Sveaskog immediately.

### **Competition law**

Business Partners must be committed to the free market and maintaining fair and healthy competition on a level playing field in the markets in which they are active. Business Partners must respect and comply with all applicable competition law rules, including the duty not to exchange commercially sensitive and strategic information with their own competitors or those of Sveaskog, or enter into anti-competitive agreements. Business Partners must act in a competitively responsible manner and, where relevant, not abuse the position they may occupy in markets in which they are active.



### **Protection of intellectual property and confidential information**

Business Partners must respect Sveaskog's intellectual property rights and protect Sveaskog's confidential information by guarding it against misuse, theft, fraud and unauthorised disclosure. This includes patents, trademarks, copyright and trade secrets.

### **5. Reporting irregularities to Sveaskog – whistleblowing**

If Business Partners, their employees, subcontractors, consultants, contractors, local communities or any other stakeholders consider that the requirements of this Code of Conduct are not being met, or that Sveaskog is not acting in accordance with the requirements, we encourage this to be reported via Sveaskog's whistleblowing service: [Sveaskog whistleblower page – CRD Protection](#).