Heimstaden BOSTAD

GROUP POLICY
Anti-Corruption

Policy owner: *Chief Legal Officer (CLO)*

Approver: *CEO*

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1. Purpose and Mandate

The Policy ensures zero tolerance for corruption in all business activities, implementing a risk-based anti-corruption program in compliance with applicable laws and regulations. The foundation is outlined in our Code of Conduct.

Heimstaden Bostad (HSTB) upholds strict ethical standards, rejecting corruption and bribery. We require our Business Partners to adhere to principles of ethics, integrity, honesty, and legality.

We maintain zero tolerance for conducting business with sanctioned individuals, entities, countries, or regions (see our Code of Conduct). To minimize counterparty risk, we perform Know Your Counterparty (KYC) checks and sanctions screenings on Business Partners and third parties in accordance with our Policies, Manuals, and Guidelines. Our procedures and guidelines ensure screening for money laundering and sanctions among our business partners, tenants, and other third parties.

Group Director of Governance, Risk and Compliance (GRC) is given a mandate from Chief Legal Officer (CLO) to administer the Anti-corruption Policy (AC Policy) and implement the Anti-corruption Manual (AC Manual) throughout HSTB with the assistance from Local Policy Owners (LPOs) and other Group Policy Owners (GPOs).

2. Requirements

1. GPOs and LPOs ensure AC Policy and AC Manual implementation across HSTB.
2. Management in Group and Countries supports implementation of this Policy and declares zero tolerance for corruption.
3. HSTB prohibits facilitation payments and do not take political positions or associate with political movements.
4. Sponsorships and donations should never seek unfair advantage, aligning with Group and local guidelines.
5. Due diligence exercised in selecting business partners to prevent involvement in corruption, money laundering, or illegal activities, following relevant manuals and guidelines such as the AC Manual, Procurement Manual, and Business Partner Principles.
6. Business courtesies may be seen as corruption; adhere to the Code of Conduct.
7. Conflict of interest is not corruption, but it may be associated with corruption and should be considered in scope of this Policy. See the Code of Conduct and Anti-Corruption Manual.
8. GPOs and LPOs conduct assessments to identify, report, and mitigate corruption risks, following Risk Management Policy and Manual.
9. GPOs and LPOs support, inform, and guide the organization on policy-related activities.

10. GPOs and LPOs emphasize the fight against corruption, ensuring additional training as required, including mandatory Group training every 18 months, as well as for new employees and those returning from leave.
11. GPOs and LPOs ensure employees report corrupt activities and money laundering attempts through the Whistleblower solution (see Reporting chapter 3), without fear of retaliation. If corrupt conduct is revealed, relevant actions shall be implemented.

3. Reporting

Promptly report any actual or suspected fraudulent or corrupt behaviour through the Whistleblower solution. Share the information with the Group Director of GRC, Chief People & Culture Officer (CPCO), and immediate Manager (if not involved). Anonymous reporting is available in the Whistleblower solution.

Countries must provide requested reports to Group GRC quarterly or as requested.

4. Reference Documents

- Code of Conduct
- Group Anti-Corruption Manual
- Know Your Counterparty Questionnaire
- Group Business Partner Policy and Group Procurement Manual
- Business Partner Principles (Previously named Code of Conduct for Business Partners)
- Group Risk Management Policy and Manual
- Group Sponsorship & Donations guideline