

**POLICY**

Valid from

24 October 2024

Approved by

Board of Directors

Eastnine AB (publ)

## CODE OF BUSINESS CONDUCT

### 1. INTRODUCTION

Eastnine's Code of Business Conduct provides a reference framework and should be followed both by the letter and in spirit. However, no policy can cover all situations that may arise. Employees and board members are therefore obligated to use their good judgement and, if applicable, ask for guidance e.g. from their managers in upholding the principles and values set forth below in all aspects of Eastnine's operations.

Eastnine commits to following OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, and Fundamental Principles and Rights at Work of the International Labour Organisation (ILO). Eastnine is a signatory to United Nations Global Compact and commits to publicly demonstrate and share its progress towards the universal [ten principles](#) and the Sustainable Development Goals.

### 2. BACKGROUND AND SCOPE OF APPLICATION

This Code has been developed as the least common denominator of high-level principles and as guidance to all employees and board members of Eastnine AB (publ) and all Eastnine Group subsidiaries, independently of their particular geographical, legal or functional area of operations. It sets the standards for how we all are expected to behave in general while other rules and regulations describe requirements applicable for more particular situations.

Eastnine operates in highly regulated environments with rigorous professional standards, laws and regulations providing both general guidelines and specific instructions for business conduct. This Code serves as a broader framework offering references and guidance for navigation among these regulations. Applicable laws and regulations should always serve as the minimum requirements.

### **3. A VALUE DRIVEN COMPANY**

Eastnine's vision is to create and provide venues where ideas can flow, people can meet and successful business can be developed. It is of vital importance that our employees understand our vision and company values that lay the foundation of our company culture and help our organisation work together towards the same goal. Eastnine's values that guide our actions are being solution-oriented, creative, responsive and transparent. In order to serve customers in the best way it's important to have a common mindset, gather and share knowledge on how to best organise our work, as well as to remain curious and open to new ideas, technology and solutions. We are bold, we take initiatives, make decisions and are not afraid of failure. We care and treat our customers with respect and we support and guide each other.

### **4. PRINCIPLES FOR BUSINESS CONDUCT**

Eastnine's aim is to create an attractive sustainable return for its shareholders. Eastnine operates with the welfare of our shareholders, tenants, our team members and business partners as well as society, environment and legislation in mind.

#### **4.1 Communication with shareholders**

As a listed company, Eastnine is required to ensure that all information issued by the company is provided in accordance with applicable rules and regulations. Eastnine's guiding information principle is transparency - to give all relevant parties correct, relevant, honest, consistent, reliable and timely information, allowing the public to form an accurate picture of the company and the company's development and thereby allowing Eastnine to build and maintain the capital market's confidence in the company. Our business is built on trust from our shareholders and in order to gain and maintain this trust we need to meet our shareholders', and the stock markets, information demands. Read more in Eastnine's Information Policy.

#### **4.2 Abiding stock market rules and legal frameworks**

Eastnine, represented by its employees and board members under all circumstances shall understand and comply with all local applicable laws and regulations, as well as market practice as long as such practice do not contradict the principles of this Code.

Since the shares of Eastnine are admitted to trading on Nasdaq Stockholm, all employees and Board members in Eastnine are prohibited under the EU Market Abuse Regulation and Market Abuse Act to engage in insider dealing; unlawfully disclose insider information or; engage in any form of market manipulation. All new Board members and employees must undergo training related to the Market Abuse Regulation and at all times comply with Eastnine's Insider Policy. Failure to comply with the rules set forth therein may result in penalties or imprisonment.

#### **4.3 Societal contributions**

We acknowledge our mutual dependency on the societies of which we are a part. Other than direct contribution from our business activities such as creation of jobs, tax contribution and an endeavour to maximise return for our shareholders, we shall strive to be a good corporate citizen through engaging in conversations and initiatives with local communities, municipalities and associations.

#### **4.4 Managing environmental impact**

Eastnine's environmental impact results primarily from our property management activities. To mitigate this direct environmental impact we shall work proactively on reducing carbon emissions by improving energy efficiency and increasing the share of renewable energy consumption in our real estate portfolio. We shall use globally acknowledged environmental certifications to ensure highest environmental standards during development and exploitation of Eastnine's properties. Eastnine's Environmental policy provides further information on the company's commitments towards reaching a climate neutral status by 2030.

#### **4.5 Responsibility for our team members**

We shall provide equal opportunities to all employees, regardless of gender, gender identity, national or ethnic origin, age, sexual orientation and religious faith. We believe every employee is entitled to work in an environment that respects personal dignity and that is free from harassment, bullying or any other type of intimidation or discrimination. Read more in Eastnine's Equal treatment Policy.

Eastnine shall offer all employees a safe, healthy, stimulating, and varying work environment, where employees can actively participate in the development of their work content. We believe that work environment based on empowerment and collaboration along with a robust support system for individual physical and mental health, are important contributing factors to building an effective and high performing organisation. Work satisfaction and enjoyment are crucial parts of creating a positive atmosphere and strong sense of engagement. Eastnine offers its employees training and skill development where possible to support our employees in growing and developing both personally and professionally. Read more in Eastnine's Work Environment & Employee Health Guidelines.

Eastnine recognizes and respects employees' right to freedom of association and collective bargaining as put in the the International Labor Organization (ILO) convention no. 87.

#### **4.6 Long-term relationships with business partners**

Our success is dependent on the performance of many different business partners such as tenants, suppliers, advisors and media and we shall treat them with the same respect as we treat our own team members. We shall provide the best possible service to our tenants by anticipating their needs and acting in an innovative and sustainable manner. We shall strive to build stable long-term relationships with our suppliers contingent on their full compliance with national laws, regulations and applicable standards for the countries in which they operate. Additionally, we require our suppliers and their subcontractors to comply with Eastnine's Supplier Code of Conduct and reserve the right to perform relevant audits to review suppliers' adherence to the Supplier Code of Conduct. Violations of the Supplier Code of Conduct may result in terminating activities with the supplier.

### **5. BUSINESS ETHICS**

#### **5.1 Anti-money laundering**

Eastnine shall work proactively with monitoring financial transactions and identify and report any transaction which might indicate a breach of laws and/or regulations. Eastnine complies with anti-money laundering and financial crime legislations in all countries where we operate and performs appropriate due diligence and screenings of our business partners and suppliers. Eastnine further only makes payments to a company that provides Eastnine with a specific service, in the same country where the supplier either does business or has provided services to Eastnine, following a two- or three step authorization from within the organization.

#### **5.2 Zero tolerance to bribery and corruption**

Eastnine and our employees shall not, under any circumstances, accept or participate in offering bribes or other exercise other types of inappropriate influence towards suppliers, authorities or other counterparties. No employee may offer or receive any benefits for carrying out a work assignment or promise to pay or accept anything of value either directly or indirectly to improperly influence the judgement or actions of others. In situations of uncertainty with regards to whether a particular action can be interpreted as an attempt at or manifestation of bribery, corruption and/or improper influence all employees are required to consult their manager or Head of sustainability as appropriate. Employees shall comply with our Anti-Corruption Policy.

#### **5.3 Respect for union rights and freedom of association**

Eastnine respect the rights of all employees to join unions and organize themselves to engage in collective bargaining as per ILO convention no.87. Any discrimination or other punitive measures owing to the membership of organizations or legitimate union activity against employee representatives and union members is prohibited.

#### 5.4 Human rights and proscription of forced- and child labour

Eastnine expects all employees, partners and suppliers to avoid causing or contributing to human rights infringements through their business actions and protect the safety of their co-workers by following applicable laws regarding working conditions. No employees may be under the applicable statutory minimum age, and no form of forced labour such as under threat or other pressure is permitted.

### 6. CONTRIBUTIONS TO THE UNITED NATIONS (UN) SUSTAINABLE DEVELOPMENT GOALS

Eastnine supports the UN Agenda 2030 for sustainable development and will through its business objectives actively contribute to the following global targets for a sustainable development.



### 7. CONFLICTS OF INTEREST

Eastnine employees shall refrain from involvement in any business or activity that competes with Eastnine and shall notify their manager and discuss the suitability of any external activity which may pose a conflict.

### 8. ENFORCEMENT

Eastnine strives to build an open corporate culture permeated by the values expressed in this Code. It is our expectation that all employees and board members by accepting employment or assignment with Eastnine also are subscribing to this value set. Therefore, any deviation would be unintentional and, on occurrence, disclosed and corrected as soon as possible. It is our expectation that any employee whose attention is drawn to such deviation would take it seriously and without retaliation towards the source. All employees are encouraged and expected to report any breach or suspected breach of this Code or any other internal rules to their immediate manager or through our [whistleblower service](#). More information can be found in our Whistleblower Policy. Retaliation against any employee who, in good faith, reports a concern about illegal or unethical conduct will not be tolerated.

**9. RESPONSIBILITY**

Responsibility for implementation of this policy: CEO

Responsibility for implementation control: CFO

Responsibility for yearly review: Board of Directors

Time for review: Continuously and annually

**10. DISTRIBUTION**

This Code will be distributed internally within Eastnine and externally subject to the decision of the CEO.

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This policy was originally adopted by the Board of Directors on 11 December 2008, and latest updated on 24 October 2024.