



# Code of Conduct

Document owner  
CEO

Established  
2010

Revised version  
20/2/2020



## Table of content

1 Background and purpose .....	3
2 Policy .....	3
2.1 Ethical values and business principles.....	3
3 Target group .....	5
This policy applies to all entities within the Green Landscaping Group. ....	5
4 Roles and responsibilities .....	5
5 Exceptions .....	5
6 Proof of compliance .....	5
7 Associerade dokument .....	6

## 1 Background and purpose

This Code of Conduct applies to Green Landscaping Group (Green).

The Code of Conduct comprises a number of principles that describe Green's common values. The principles are group-wide and are supplemented by Green's common policies, guidelines and practices in specific areas such as finance, communications, HR and purchasing.

The purpose of the Code of Conduct is to convey our shared ethical values and business principles to all our employees, customers, suppliers, other business partners and our owners, as well as to provide guidance in our day-to-day activities.

The Code of Conduct has been drawn up by HR and approved by Green's Board of Directors. Any questions or comments about this Code should be directed to HR (or immediate superior).

## 2 Policy

### 2.1 Ethical values and business principles

#### 2.1.1 Law and ethics

One basic requirement is that everyone at Green complies with environmental legislation, rules of competition, labor law, rules and regulations for publicly listed companies, tax law, data protection law (GDPR), safety requirements and other laws and regulations that establish the framework for our business and that are relevant to each employee in his/her job at Green Landscaping. Any deviations from this are totally unacceptable.

In addition to complying with laws and regulations, Green has a responsibility to adhere to the highest standards of ethics and business ethics in all its activities and in all its relationships. All employees must take personal responsibility and not just for their own actions; they must also take responsibility for Green's activities. Any form of deceitful conduct by Green or its employees is unacceptable.

All Green employees shall make cost effective use of the company's resources.

Green's employees shall respect the UN's Universal Declaration of Human Rights and comply with international agreements regulating child labor.

#### 2.1.2 Conflict and interest

Employees must notify Green Landscaping in writing of any secondary employment with or part ownership of a customer, supplier or competitor business, and where appropriate obtain Green's consent. Green shall give such consent provided the secondary employment or part ownership does not obviously create a commercial conflict of interest. Employees are not required to give notification in connection with the purchase of a small number of listed shares.

### *2.1.3 Gifts, bribes and hospitality*

Green's employees may never, directly or indirectly, offer, give or accept bribes, benefits or other pecuniary rewards for unauthorized purposes, or for the purpose of improperly generating or retaining business, if it is considered to be in conflict with applicable laws, regulations or business practice.

Green's employees shall comply with the Code of Business Conduct that has been established by the Swedish Anti-Corruption Institute, and which is a complement to Swedish legislation.

The rules cover all kinds of benefits that are likely to affect one or more employees' attitudes, decisions and conduct. As a rule, such benefits have a financial value, but this need not necessarily be the case.

Hospitality is a form of hosting that is directly connected to the company's operations and can be aimed at external as well as internal parties. In order for hospitality to occur, there must be a connection to the company's operations, and it has to be in accordance with applicable laws and regulations. This requirement is valid for purpose, time and place for the hospitality and the persons included.

### *2.1.4 Environment and work environment*

Green takes active measures to prevent and continuously reduce the negative impact of the company's activities on the environment, in accordance with Green's Sustainability policy (Hållbarhetspolicy).

Green takes purposeful and systematic action to create a sound work environment, both physical and psychosocial. The overall objective is to create a safe and healthy workplace that promotes the development of the company and its employees. All Green employees shall comply with legislation and collective agreements to maintain a sound work environment. No employee should face discrimination on the grounds of age, gender, religion, sexual orientation, lack of accessibility for the disabled, political views, ethnic origin or trade union membership.

Green encourages a culture of equal opportunity and diversity where appointments to a position, rewards and personal success are dependent on individual ability and performance.

### *2.1.5 Suppliers*

Green shall take active steps to ensure that its suppliers and subcontractors undertake to respect the principles stated in this Code of Conduct. In conjunction with the supplier evaluation, Green's suppliers and subcontractors shall have a Code of Conduct that is accepted by Green, or accept the principles underlying Green's Code of Conduct.

Repeated, or serious breaches of this Code of Conduct will result in the termination of the cooperation with the offending supplier or subcontractor.

Green shall take active steps to ensure that suppliers undertake to respect the principles stated in the Code of Conduct. In conjunction with supplier evaluation, Green's suppliers



shall have a Code of Conduct that is accepted by Green, or have a Green's Code of Conduct, or accept the principles of the Green's Code of Conduct.

Repeated or serious breach of the Code of Conduct shall result in the termination of business cooperation with the relevant supplier.

#### *2.1.6 Confidential information and professional secrecy*

Confidential information about Green, or a customer, relating to strategies, processes, systems, agreements, services and other business activities, must be protected and may not be disclosed either in writing or orally to unauthorized parties.

#### *2.1.6 Inside information*

If an employee receives information that likely can be deemed as inside information, the employee must immediately notify Green's CEO or CFO. Inside information is information that (no matter its form) is of a precise nature and has not been made public, relates directly or indirectly to the Company or the Company's shares, and if it was made public, would be likely to have a significant effect on the price of the Company's shares.

#### *2.1.7 Processing of personal data*

Green only collects and processes personal data that is necessary to, among other activities, provide a service or an employment in the Group. How and why the personal data is processed must be clearly stated at the time of collection and must be done in accordance with data protection law (GDPR).

### 3 Target group

This policy applies to all entities within the Green Landscaping Group.

### 4 Roles and responsibilities

Each manager is responsible for ensuring that his/her personnel confirm in writing that they have read, understood and agreed to follow the principles of this Code of Conduct.

Managers at Green shall always set a good example.

### 5 Exceptions

Exceptions from this policy must be approved by the CEO.

### 6 Proof of compliance

#### 6.1 Implementation

Each manager is responsible for ensuring that his/her personnel confirm in writing that they have read, understood and agreed to follow the principles of this Code of Conduct.

Managers at Green shall always set a good example.

## 6.2 Follow-up

The Code of Conduct should be a natural part of the day-to-day operations. All employees are encouraged to report violations of current laws and regulations or this Code of Conduct. A report can be submitted to the HR Manager, the MD or the Chairman of the Board. The report can be made in person or via the responsible manager.

Green does not accept any form of discrimination or retaliation against employees who have reported suspected violations, provided the report is not deliberately false. Violations of the Code of Conduct may lead to legal measures being taken.

The following information should be included in a report of a suspected breach of the Code of Conduct:

1. Name and contact details of the person reporting the suspected breach (not applicable to anonymous reports).
2. What happened?
3. Where did it happen?
4. When did it happen?
5. Who was involved?
6. Other information that may be relevant or useful to the investigation of what occurred.

A report may be made orally, by telephone or email.

Elisabet Järstrand, HR Manager; 070-695 68 50, [elisabet.jarstrand@greenlandscaping.se](mailto:elisabet.jarstrand@greenlandscaping.se)  
Johan Nordström, CEO; 070-838 58 12, [johan.nordstrom@greenlandscaping.se](mailto:johan.nordstrom@greenlandscaping.se)  
Per Sjöstrand, Chairman of the Board; 070-724 51 49, [per.w.sjostrand@gmail.com](mailto:per.w.sjostrand@gmail.com)

## 7. Associated documents

- HR policy
- Insider policy
- Sustainability policy