



CODE OF CONDUCT

This Code of Conduct (the “Code”) was adopted by Scandic’s Board of Directors with the purpose of ensuring that Scandic’s operations are conducted in a manner that inspires confidence in our fundamental values and complies with legislation and best practices for listed companies. The Code shall be revised annually or more often if required. The CEO is the owner of this Code. Each EC member has the operational responsibility for implementing the Code within their area of responsibility.

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Code of Conduct for
Scandic Hotels Group
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Scandic

PURPOSE

It is fundamental for Scandic that all of our operations including subsidiaries are operated in a sustainable manner. We see contributing to a sustainable society as a strong factor for success.

The Code sets out our fundamental values and how we want to operate our business in an ethical, sustainable and legal manner. Scandic always acts in accordance with the national legislation in all of the countries where we operate and takes appropriate measures to prevent the direct or indirect violation of human rights, labor law, environmental law, competition law and anti-corruption law. The provisions in the Code constitute the minimum requirements for Scandic's operations. If local, national or international legislation impose more stringent requirements than this Code, these shall be followed.

IMPLEMENTATION

The Code is binding and applies to all employees (regardless of employment status) and all operations including subsidiaries and hotels operated on a franchise basis.

All of Scandic's managers are responsible for ensuring that both the contents and the spirit permeating this Code are communicated, understood and complied with by all employees. Scandic's managers are also expected to encourage employees to report incidents that may involve violations of the Code. Neither explicit nor implicit acceptance of questionable behaviour in violation of the Code shall be tolerated.

Scandic shall ensure that its employees possess the information, skills and tools required for compliance with the Code in the daily operations.

It is important that the services and products that we offer are sustainably produced. We therefore require our suppliers, subcontractors and partners adhere to our separate **"Code of Conduct for Suppliers to Scandic Hotels Group AB"**, which is based on the same principles and values as this Code.

When staying at our hotels, we expect our customers to adhere to the basic principles and fundamental values of Scandic as stipulated in this Code.

VIOLATION AND REPORTING

If this Code is violated but Scandic notes that there is a wish to comply and undertake measures to comply with the principles stated in this Code, Scandic shall, as a first step, initiate a dialog with the person concerned. This is on the condition that Scandic will not suffer financial, reputational or other loss as a result. Depending on the nature of the breach Scandic can also provide an admonition or alternatively terminate the agreement with the employees.

Any violations of the Code must be reported immediately to the immediate manager or other person designated by the company. Via our whistleblower function on our intranet Fuse and our external website it is possible to report violations anonymously.

HUMAN RIGHTS AND WORKING CONDITIONS

Fundamental human rights and working conditions shall be known, respected and equally applied to all employees regardless of employment status.

DIVERSITY, EQUALITY AND INCLUSION

Scandic strives to create a workplace characterized by a diverse work force and an inclusive environment with equal opportunities. We are convinced that employees with different backgrounds and genders contribute to more successful and sustainable operations and to a better decision making. In short, diversity increases the value of Scandic's business.

DISCRIMINATION AND HARASSMENT

Scandic does not accept any form of discrimination, neither directly nor indirectly, actively or passively, based on gender, transgender identity or expression, ethnicity, religious belief, disability, sexual orientation, or age. Scandic treats each employee with respect and dignity and strives for accessibility for all who use our facilities. For further information, please see Scandic's "**Diversity and Inclusion Policy**".

FAIR EMPLOYMENT CONDITIONS

We reward our employees in a fair manner and have processes to hinder unjustified salary differences. All employees are entitled to a contract written in a language they understand that clearly outlines terms of employment and period of notice. The right to freedom of association and collective bargaining shall be recognized and respected in accordance with the laws in the countries in which the employee is employed. No employee shall be forced to work overtime that exceeds the maximum time stated in national legislation. No employee shall be subjected to or threatened with corporal or psychological punishment or physical, sexual or verbal abuse or attacks.

HEALTH AND SAFETY

Building a strong safety culture is important to ensure the safety of our guests and employees. Scandic offers all employees a sound and safe working environment. We work continuously to prevent accidents and injuries that can occur in the workplace. We carry out and document regular health and safety training and take measures to reduce risks when such are identified as necessary.

CONFIDENTIALITY AND INTEGRITY

Scandic shall always protect an individual's right to privacy and confidentiality, whether it is a person staying at our hotels or an employee. When Scandic process personal data, we respect our guests and employees' rights to privacy and confidentiality. For more information on how we process personal data, please see our **Privacy Policy**.

CHILD LABOR AND FORCED LABOR

No form of child labor or labor involving minors is ever allowed. Scandic does not allow any form of forced labor, slave labor or any other forms of work carried out against one's will in our operations. Regardless of the minimum age in national legislation, at Scandic the minimum age for employees is 15 years of age. Employees under 18 years of age shall not work the night shift or carry out risky or heavy work.

HUMAN TRAFFICKING

Scandic views prostitution and human trafficking as a particularly important question for our industry to engage in preventing, why we continuously work to improve our processes to counteract prostitution and train

our employees in detecting such actions and taking appropriate action. We will never accept prostitution at our hotels.

ENVIRONMENT

Scandic works continually to reduce the negative impact on the environment from our business. We encourage methods that reduce environmental impact.

For Scandic, it is critical to continuously reduce greenhouse gas emissions and energy consumption. We prioritize energy from renewable energy sources. When choosing methods of transportation and travel, we always try to take environmental impact into account.

For further information, please see Scandic's "**Environmental Policy**".

BIODIVERSITY, RESOURCE INFLOWS AND WASTE

Scandic always assesses whether hotels are located in/ in proximity to bio sensitive and protected areas. It is essential to be aware of our impact and where possible actively support conservation efforts. Products purchased by Scandic shall not contain materials from endangered species or use materials which has a direct impact on endangered species.

We apply the precautionary principle in our assessment of substances and processes that may harm the environment. We strive for renewable raw materials and/or recycled materials in the products we use, and the use of resources and energy during production shall be minimized. Products shall also have a long lifetime, be easy to maintain and repair and be recyclable. Our approach is to always keep waste to a minimum. We work to minimize food waste and limit the use of packaging and materials across our business.

We reuse and recycle as many of our products and materials as possible. Waste is as often as possible sent to recycling facilities or other external facilities for reuse.

WATER, CHEMICALS AND HAZARDOUS SUBSTANCES

Scandic aims to reduce water use by measuring water consumption in our operations and analyzing what can be done to reduce it. Scandic uses a minimum amount of dangerous chemicals and substances. When we do use them, they are handled safely and properly to protect human health and the environment. To ensure this, we have developed guidelines for our chemical use, please see "**Guidelines to sustainable procurement**".

ANTI-CORRUPTION

Scandic follows all national and international regulations to prevent, detect and deal with corruption. For further information, please see Scandic's "**Anti-Corruption Policy**".

BRIBERY, FRAUD, EXTORTION AND MONEY LAUNDERING

Bribery and the use of improper benefits are prohibited by law and Scandic takes works actively to prevent and stop any actions that might be considered bribery or corruption. Scandic's "**Anti-Corruption Policy**" and "**Guidelines on Gifts, Rewards and Benefits**" provide further guidance regarding permissible and prohibited benefits. Scandic's employees must refrain from every action or omission related to fraud, extortion or money laundering, and Scandic will actively cooperate with any internal or external investigations into such crimes.

CONFLICTS OF INTEREST

Business decisions shall always be made with Scandic's best interest in mind. Employees must never use or take advantage of their positions within Scandic or their influence for any other intention than promoting Scandic's interests. Personal relationships and considerations must never influence business decisions or appointments and dismissals. This includes any possible personal gain for employees as well as for their friends and relatives. To avoid conflicts of interest, employees shall not work outside of Scandic without informing Scandic.

Employees must exercise transparency with regard to potential conflicts of interest and waive responsibility for any decision-making that gives rise to or may be perceived as giving rise to a conflict of interest, and always inform their immediate manager if there is a risk of a conflict of interest.

FAIR COMPETITION

Scandic works actively to ensure that no anti-competitive actions are being taken within the company. All Scandic employees have a role to play in ensuring that the company competes in as strong and constructive manner as possible while conducting its operations in accordance with Scandic's guidelines on fair competition.

PRIVACY

Data protection and privacy is a human right and Scandic works actively to ensure that we protect our customers and employee's personal data in the best way. For more information, please see our "Privacy Policy".

WHISTLEBLOWER LINE

Scandic has a whistleblower line, managed by an independent external advisor, that enables team members, guests or other stakeholders to report violations to this Code of Conduct anonymously.