

The Swegon Group Supplier Code of Conduct

Version: 2026-04-02

Policy review: 2028

Responsible: Procurement Director Swegon Group

“In Sustainable Procurement, Swegon and our partners turn our Code of Conduct into meaningful action — creating responsible value that strengthens our supply chain and supports a sustainable future.”



Eva Karlsson, Chief Executive Officer

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1. Introduction and Swegon's expectations

The Swegon Group and its parent company Latour are committed to integrate sustainability in the supply chain for the purpose of enabling our customers and our business partners to pursue a sustainable development.

We have the firm belief that our Core values and our outlined standards should make everyone "Feel good **inside**" in every environment, situation, or relation that we find ourselves in.

By applying the Swegon Supplier Code of Conduct in the daily work, you help ensuring that our business is conducted in a responsible and sustainable way. We expect you to follow the outlined requirements and guiding principles stated in this document. These principles shall be applied to suppliers, agents, distributors, dealers, (sub-) contractors, and other business partners of Swegon and its operating subsidiaries, affiliates, and divisions (further referred to as "supplier"). We expect you to establish and implement an own Supplier Code of Conduct for your own supply chain. You may use this document for inspiration.

We truly believe in collaborating with our suppliers to improve conditions together. Nonetheless, if a supplier refuses or is unable to maintain these standards or work towards complying, we may demand corrective action and/or terminate the relationship as a last resort.

Further in this document the Swegon Group may also be referred to as "Swegon", "We", or "Our", the Swegon Code of Conduct may also be referred to as 'The Code'.

For operational, technical, and quality requirements see the Supplier Manual accessible at:

<https://www.swegon.com/siteassets/for-suppliers/swegon-supplier-manual.pdf>

2. Swegon's commitments

Latour is a signatory of the UN Global Compact and by this, Swegon is also subject to the principles of the pledge. Swegon is committed to the principles of the UN Global Compact aiming at aligning businesses with human rights, labour rights, environmental care, and anti-corruption principles.

We continuously evaluate and select suppliers based on their ability to comply with the requirements and principles of this Code. Within certain areas, we set qualitative and quantitative targets to ensure measurability and progress.

We commit to supporting our suppliers for building long-term relationships characterized by honesty and fairness. We commit to the following behaviour:

2.1. Purchasing practices

- We will not reveal any pricing, technology, or other confidential information without prior written permission by our supplier.
- We will not make false or misleading remarks to others about suppliers or their products or services.
- We will comply to the same business ethics and expectations as our suppliers do.
- Placing orders with mutually agreed lead times between us and suppliers and respecting these accordingly.
- Making sure that changes in running orders only occur when both parties agree on the renewed timeframe and other consequences as a result of the changes.
- Paying a responsible price to the supplier for maintaining a stable and long-term healthy partnership between both parties.
- Paying a price that enables the supplier to meet the requirements in this Code of Conduct.

2.2. Responsible termination of business relationship

When improvement options are exhausted and the decision has been made to terminate the business relationship, the following steps must be followed:

- Formally communicating the decision to the supplier in good time.
- Explaining that the upcoming disengagement is due to an identified continued violation of the Swegon Supplier Code of Conduct while no sufficient corrective actions were taken.
- Agreeing on a mutually developed phase out plan while involving all relevant stakeholders, considering the social impact of termination.



3. Fair business principles

With regards to the Swegon Code of Conduct and internationally recognized ethical standards of conducting responsible and fair business, the following principles highlight our expectations towards our suppliers.

3.1. Obeying laws

The laws and regulations of every country the Swegon Group operates in must be obeyed. Swegon wants to emphasize that our requirements may not be limited to what is required by national law. When national legal requirements are less strict than this Supplier Code of Conduct, we expect the supplier to apply the higher standards at all times.

3.2. Fair competition

The Swegon Group acts both ethically and in a fair way when competing in the market. We consider this a precondition for healthy and long-term relationships to customers and suppliers.

Our expectation and our commitment to you:

- You/We do not discuss or exchange sensitive commercial information with competitors.
- You/We do not engage in any inappropriate activities or unfair trade practices.
- You/We never agree or collude with other companies to fix prices, allocate markets, or manipulate any bidding processes.
- You/We never gather market information or competitive intelligence through illegal or inappropriate means.

3.3. Anti-corruption, anti-bribery and gift giving

Swegon applies a zero-tolerance policy for all forms of corruption, including extortion, embezzlement, and bribery. It is strictly prohibited in all business matters, in every country around the world, in both the private and government sectors. We will not accept any type of corruption related to our business and we expect all our suppliers, its employees, and partners in the supply chain to embrace this policy and act accordingly.

Our expectations:

- Establish and implement an anticorruption policy clearly stating that no form of bribery, corruption, money laundry, conflicts of interest, and provision of false information or tax offences is acceptable.
- Never offer, promise, or authorize a payment or the giving of anything of value to anyone to obtain an improper business advantage.
- When using third parties such as distributors or agents, they must require that they conduct business at the same level of integrity and honesty, including avoiding a payment or offer of gifts or bribes.
- Train and continuously inform all concerned employees on these policies, rules, and responsibilities on anti-corruption. The content of the training shall be documented, and a register of participants shall be established.



3.4. Anti-money laundering and anti-financial crime

The Swegon Group is committed to comply with laws against money laundering and terrorism financing which are in place in most countries worldwide. We take preventive actions and perform adequate due diligence(s) to avoid being part of or facilitating money laundering and/or other financial crime.

We expect the same engagement from our suppliers.

3.5. Non-compliance, whistleblowing, and commitment of no retaliation

Swegon wants to create a fair, safe, and healthy business relationship while becoming a preferred business partner. In order to maintain an environment where everyone feels good inside, it is everyone's responsibility to bring the principles in this Code to life.

This code of conduct is also supposed to maintain the integrity of the Swegon Group, its customers, and all other business partners. This cannot be preserved if individuals are reluctant or afraid to raise or report a concern or suspected breach of our Code, Group Policies, or the law.

Therefore, Swegon expects suppliers to have a no-retaliation policy that permits workers to speak with Swegon staff without fear of retaliation by their own management when reporting any misconduct in relation to our Code of Conduct. We will take the necessary actions to ensure that people who report misconduct are not disadvantaged, discriminated against, nor are traceable.

What we expect of you:

- If you experience or witness questionable behaviour that does not seem right to you, then it probably is not. Swegon is committed to remind everyone about the Code, educate and train, and even enforce compliance.
- If you are not comfortable or unsuccessful directly addressing individual conduct or the matter involves serious misconduct or fraudulent behaviour with your own management or your Swegon contact, then you have a responsibility and must report your concerns through our externally available anonymous Whistleblowing system.

Any violation or suspected abuse of this Code of Conduct can be filed via

<https://report.whistleb.com/swegon>

Our parent company Latour offers a Whistleblowing service as well which could be used for matters relating to the trusted Swegon persons or Swegon as a whole.

<https://report.whistleb.com/latour>

Both systems are independent from Swegon Group's and Latour's IT services and can only be accessed by designated and trained staff of the respective companies.

Be assured, if you voice your concern in good faith, there will be no retaliation taken against you. If Swegon receives information about a supplier who engages in retaliation, the supplier may be subject to corrective actions.



4. Swegon is about people

4.1. Diversity, equal opportunities, and non-discrimination

We expect our suppliers to ensure equal opportunities based on competence, experience, and performance regardless of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, union affiliation, social background, or ethnic origin in hiring or other employment practices.

4.2. Anti-harassment

Swegon expects its suppliers to provide a work environment that is free from harassment of any kind and/or any other offensive or disrespectful conduct. Physical, psychological, sexual, or verbal harassment against any colleague or supplier will never be tolerated.

4.3. Employment conditions

The Supplier shall ensure that all workers are paid at least the minimum wage required by applicable laws and regulations including legally mandated benefits laws and comply with industry standards on working hours. All employees, including those temporarily employed, should have their employment conditions in writing and be made aware of their employment responsibilities.

4.4. Health and safety at work

The Supplier is expected to maintain and update a health and safety policy (signed by the chief executive) including objectives and an action plan for the reduction of risks regarding health and safety.

Therefore, a supplier shall provide all its employees with the necessary conditions and equipment, including appropriate safety information and training. This shall include monitoring health and safety risks as well as identifying, minimizing, and preventing such risks. Such procedures should include safety instructions, work procedures, worker training, and identification of appropriate safety devices, personal protective equipment (PPE) and clothing, chemical control, and machine safeguarding.

PPE should be provided, free of charge, and available for all workers, including but not limited to temporary workers.

A supplier shall further adequately communicate information and provide training about occupational health and safety hazards.

4.5. Fire Prevention

The Supplier shall ensure that emergency response plans on fire safety are prepared and communicated. Staff is to be trained and made aware of fire prevention and firefighting procedures including evacuation routines.



4.6. Freedom of association and collective bargaining

Our suppliers shall support the establishment of employer-employee dialogue and recognize the right of all employees to form and join trade unions, or similar associations of their own choosing, and the right to bargain collectively. Disciplinary or discriminatory actions against employees who join an association, or by other means organize themselves, are not accepted.

4.7. Human rights

The Swegon Group supports and respects the protection of internationally proclaimed Human Rights. One of the purposes of this Supplier Code of Conduct is to make sure that we are not complicit in Human Rights violations.

We expect our suppliers to ensure that every employee and human being shall be treated with respect and dignity. You must respect the rights of each individual and prohibit any type of harassment, violence, abuse and/or assault at the workplace.

4.8. No forced or child labour

The Swegon Group does not tolerate any forced labour or child labour in its operations or in the operations of any supplier or other party with whom we cooperate. The minimum employment age is 15 years or the lawful age for working in the respective country if that is higher.

No supplier shall allow illegal, involuntary, or forced labour, human trafficking or any forms of slavery in their operations or in the operations of any of their business partners.

4.9. Conflict minerals

Conflict Minerals are tin, tantalum, tungsten, and gold (also known as "3TG") originated from conflict-affected and high-risk areas. The trade of these four minerals could benefit armed groups responsible for human rights abuses or the use of forced labour in these areas.

Our suppliers shall be able to disclose conflict minerals in the materials or products provided to Swegon. A supplier of relevant good must be able to provide all necessary documentation for proofing its legitimate origins on request.



5. Environment and sustainability

We are committed to reduce the environmental impact of our solutions by integrating and applying a lifecycle perspective and a precautionary approach in our decision making. Meaning that we favour environmentally friendly technologies and materials in our operations and advocate them with our customers. All suppliers are invited to develop and promote their most environmentally friendly products and solutions.

We expect our suppliers to comply with all applicable environmental laws and regulations in the country of operation and internationally recognized best practice approaches. We also count on our suppliers to make every effort to reduce their environmental impact by adopting best practice principles in terms of environmental management.

Swegon evaluates and selects its suppliers on their ability and performance regarding environmental management and governance.

5.1. Environmental governance

We expect our suppliers to

- Comply with existing legislation and to minimize environmental impact.
- Attain an environmental management system like ISO 14001 or alike.
- Maintain and update an environmental policy that is signed by the chief executive.
- Set environmental objectives and track improvements.
- Measure and monitor its operations and processes with significant environmental impacts (or potential impacts) on a regular basis.
- Document the results of such procedures and provide documentation upon request.

5.2. Greenhouse gas emissions and energy

Our suppliers shall comply with local energy and greenhouse gas regulations. We expect suppliers to identify and implement opportunities for the usage of renewable and fossil-free energy.

A supplier is expected to identify and minimize greenhouse gas emissions according to the Greenhouse Gas Protocol. Further, suppliers should be able to provide Scope 1 and Scope 2 emissions upon request.

5.3. Life cycle assessment

Suppliers are expected to consider environmental impact of their products and solutions over its entire life cycle. Suppliers which are able to provide Environmental Product Declarations (EPD) for their sold products will be considered more favourable over a supplier with equivalent product specifications without an EPD.

5.4. Water management

The supplier shall comply with local water regulations, undertake actions to prevent water pollution and identify opportunities for a reduced and more sustainable use of water.



5.5. Waste management

The supplier shall comply with local waste regulations and take actions to prevent and minimise environmental damage from waste through the production process. Its solid waste (including end of life of materials/products) is to be minimized by reusing, recycling, and reducing waste.

5.6. Hazardous substances

The supplier shall comply with local regulations regarding chemicals and/or hazardous substances, take action to minimise the usage of hazardous substances and minimise potential environmental risk due to leaks or spills.

5.7. Biodiversity

The supplier shall comply with local regulations regarding biodiversity and take action to minimise the damage to biodiversity as a result of the production process.

6. Monitoring and auditing

All suppliers shall keep a record of all relevant documentation of proof and provide such supporting documentation upon request.

This Supplier Code of Conduct establishes an integral part of the relationship between a supplier and the Swegon Group. Therefore, monitoring may involve self-assessments and site visits for upholding the integrity of our values and principles.

In cases where Swegon becomes aware of any actions or conditions not in compliance with this Code, we reserve the right to demand corrective measures or commitment to an improvement.

7. Declaration of compliance

I hereby declare that I have read and understood the principles set forth in the Swegon Supplier Code of Conduct and will fully comply with these principles.

Company name	
Name	
Position	
Date	
Signature	

(Acceptance of the Swegon Supplier Code of Conduct is digitally collected and a reference to this Code is part of every supplier contract)

8. References

As Swegon is a part of the Latour Group, we acknowledge and follow the fundamental framework given by the Latour Code of Conduct. Apart from that, the following international reference documents guided and inspired us in the developing the Swegon Code of Conduct:

- The Sustainable Development Goals
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights to Work
- The UN Global Compact
- The Rio Declaration on Environment and Development
- The UN Convention against Corruption
- The UN Convention of the Rights of the Child
- The Dodd-Frank Act
- The EU Regulation on Conflict Minerals