



GOVERNANCE DOCUMENT

# Business Partner Code of Conduct

*Expectations for suppliers, contractors and distributors*

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**Version 2026**

Approved by Akademikliniken leadership · Applies group-wide

## Purpose

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This Code of Conduct sets out Akademikliniken's expectations of suppliers, contractors, distributors and other business partners. We expect business partners to conduct business ethically, responsibly and transparently, and to manage environmental, social and governance (ESG) risks throughout their own operations and value chains.

## Our Expectations

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Business partners shall comply with applicable laws and regulations and operate in line with internationally recognized standards, including the UN Global Compact, the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

## Human Rights and Labour Standards

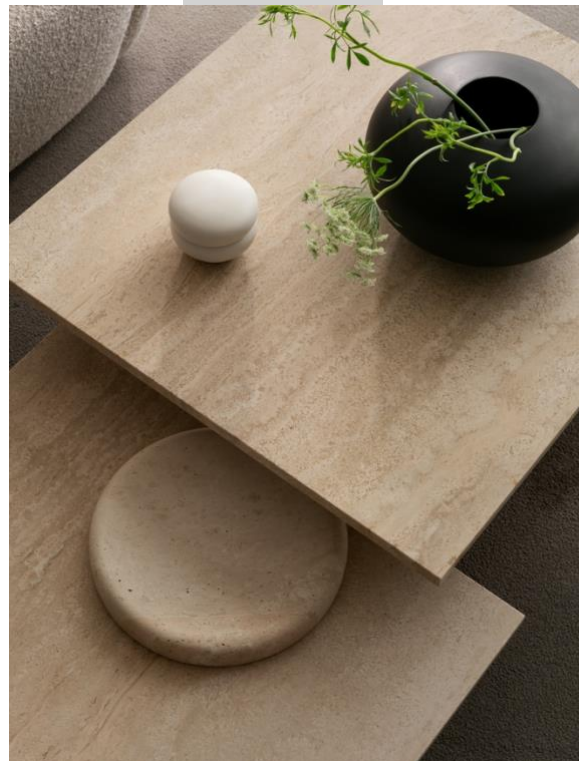
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Business partners shall respect internationally recognized human rights, provide fair working conditions, prohibit forced labour, child labour and discrimination, support freedom of association, and provide a safe and healthy workplace.

## Climate and Environmental Responsibility

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Business partners are expected to identify, measure and reduce their environmental impacts, including greenhouse gas emissions where relevant. We encourage responsible use of resources, waste reduction, circular practices, sustainable sourcing and continuous environmental improvement.



## Business Ethics and Governance

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Business partners must maintain a zero-tolerance approach to bribery, corruption, fraud, money laundering and other unethical business practices. Appropriate governance structures, controls and accountability mechanisms shall be in place.

## Responsible Supply Chains and Due Diligence

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Business partners are expected to conduct risk-based due diligence to identify, prevent, mitigate and address actual and potential adverse impacts on people, society and the environment. Similar expectations should be communicated throughout their supply chains.

## Transparency and Reporting

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Business partners shall be prepared to demonstrate how sustainability risks are managed and should communicate material incidents, severe adverse impacts or significant compliance breaches without undue delay.

## Grievance Mechanisms and Remediation

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Appropriate reporting channels should be available for employees and stakeholders. Where adverse impacts occur, business partners are expected to cooperate in remediation and corrective actions.



## Implementation and Continuous Improvement

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We recognize that suppliers are at different stages of their sustainability journey. Akademikliniken values transparency, progress and continuous improvement. We may engage with suppliers to strengthen sustainability performance and risk management capabilities over time.

## Compliance

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This Code of Conduct forms part of the basis for collaboration with Akademikliniken. Failure to address severe breaches of this Code may impact the business relationship.

Stockholm, Sweden

Juli 2026

A handwritten signature in black ink, appearing to read 'Nina Lindvall', written in a cursive style.

*Nina Lindvall, CEO*