

SUSTAIN- ABILITY POLICY

Adapteo.

Sustainability policy

Revised by the Adapteo Board of Directors
14 December 2021

Table of Contents

- Introduction 3**
 - Summary of our sustainability ambition 3
 - Purpose 3
 - Scope 3
 - Business objective and connection to sustainability 3
- Our commitment 3**
- Sustainability foundation and strategy 4**
 - Sustainability Strategy 4
 - Contributing to the Sustainable Development Goals 5
- Responsibilities 6**
 - How we work 6
 - Policy owner 6
 - Allocation of responsibilities 6

Introduction

Adapteo is a leading flexible real estate provider in Northern Europe, who builds, rents out and sells adaptable buildings for schools, day-care centres, elderly care homes, offices, accommodation, and events.

Summary of our sustainability ambition

We believe that society will go through immense changes in the years to come. As with our ways of life, where user needs and sustainability demands evolve, facilities have to transform accordingly.

With a circular construction concept, Adapteo provides buildings that can adapt to the needs of both people and planet. We use climate-smart raw materials, resource-efficient production, innovation and an inclusive approach. We offer circular and adaptable solutions that help our customers become more sustainable, and this is how we enable a more resilient and sustainable construction and real estate industry.

As a premium provider with a business model mainly built on circularity, we take responsibility from cradle to grave, securing that our circular flow expands continuously, that our buildings are designed and built in a sustainable way and take our social responsibility in society. We also work to ensure ethical business practices in our operations and through our value chain.

We build adaptable societies.

Purpose

The purpose of the Sustainability Policy is to provide overall guidelines and objectives in promoting responsible and sustainable business practices throughout our business operations and value chain.

Scope

The sustainability policy applies to all Adapteo Group, its subsidiary companies, employees, business units, management, business partners and suppliers. The policy applies to all parties participating in or contributing to Adapteo's operations regardless of employment form; being directly employed or indirectly contracted.

Business objective and connection to sustainability

Adapteo's business objective is *Building adaptable societies*.

The objective of our sustainability agenda is *Becoming one of the most sustainable companies in the industry*. Sustainability is a vital part of achieving our business strategy and works as an enabler to reach strategic goals.

Our commitment

Adapteo recognizes the need for urgent action to reach the Paris Climate Agreement and contribute to the realisation of the UN Sustainable Development Goals.

Adapteo complies with the UN's Global Compact and its ten underlying principles. This means that Adapteo at a minimum operates in a way that meets fundamental responsibilities of human rights, labour rights, environment and anti-corruption throughout our value chain. These principles are set out in our Code of Conduct that all our employees shall understand and participate in trainings on. Adapteo's Business Partner Code of Conduct adhere to the same principles and shall be signed as a part of each business agreement.

Adapteo has a precautionary approach to environmental matters and strive to minimize our negative environmental impact in our operations being development, production, and handling of our products throughout their whole life cycle. This includes efficient and responsible use of resources, monitoring and reducing emissions and waste in production, logistics as well as in setting up and dismantling our buildings. We will put our best effort to identify ways to improve the overall resource efficiency.

Adapteo and its employees shall always act as a responsible business and incorporate the protection of human rights, respect for the environment and anti-corruption in each step of our value chain. Our target is for all our employees and partners to act transparently, ethically and with respect for human rights and the environment.

To ensure this we need all employees, suppliers and business partners to understand our Code of Conduct and other principles that are part of Adapteo's contractual agreements.

Adapteo work according to an established process for sustainability dialogue and have a Supplier Risk Management Process for identifying, managing, and mitigating risks related to our supply chain. This includes evaluating potential, new and existing suppliers on their sustainability performance and follow-up on any risk indications or deviations found.

Adapteo's expectations on its stakeholders such as employees and business partners are further defined in our Operating Principles, Code of Conduct, Business Partner Code of Conduct, Group policies and detailed instructions. Policy documents and principles are reviewed annually and updated when needed.

All applicable policies can be found [here](#)

Sustainability foundation and strategy

Environmental, social, governance criteria are the basis of Adapteo's sustainability work. Our sustainability strategy is built on regulatory frameworks such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and OECD's Guidelines for Multinational Enterprises.

Sustainability Strategy

Adapteo's sustainability strategy consists of three pillars: climate-smart buildings, innovation for sustainability and inclusive society. All three pillars are linked to our core business and enable Adapteo to strategically work with relevant topics enhancing the environmental, social and economic sustainability. The foundation of our strategy – an integral part in all our sustainability work - incorporates responsible business practices, stakeholder collaboration, and contributes to the United Nations Sustainable Development Goals.

Climate smart buildings

Climate change is the defining issue of our time and it will inevitably shape our future. Today the construction and real estate industry has a large impact on the climate. By choosing climate smart raw materials and resource-efficient production, we develop climate smart buildings for the future.

Innovation for sustainability

Finding new ways of addressing global challenges will be necessary to meet people's needs within planetary boundaries. A sustainable future demands innovation and creativity. We therefore innovate for sustainability through our value chain; designing sustainable solutions and developing circular flows.

Inclusive societies

With demographic changes and increased mobility, demands for adaptable and inclusive solutions are growing.

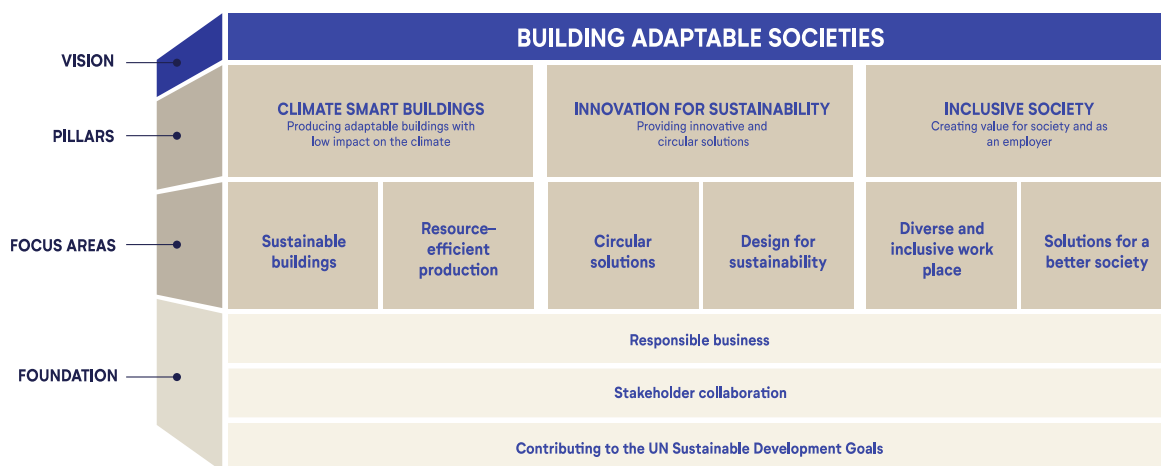
We provide spaces that fit people's changing needs by delivering adaptable solutions for an inclusive society. We also value inclusion and diversity highly at our own workplace.

Foundation

As a responsible business, we incorporate the protection of human rights, respect for the environment and anti-corruption in each step of our value chain.

We collaborate with our stakeholders to develop a more sustainable construction and real estate industry.

Our sustainability ambitions also contribute to the United Nations Sustainable Development Goals.



Contributing to the Sustainable Development Goals

The UN SDGs have been an important corner stone in the development of Adapteo’s sustainability strategy and goals. As a flexible real-estate company, we play an active role in building adaptable societies and we fully support the 2030 Agenda, with the aim to contribute to its effective implementation. Adapteo has selected six SDGs where we can see that we can contribute positively. These relevant SDGs are linked to our strategic pillars to help us implement the SDGs into our business and enables us to follow up on our actions.



Goal 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

Milestone: 4.A: Create including and safe environments for education



Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

Milestone: 8.5 Decent work and equal pay for work of equal value

Milestone: 8.8 Protect labor rights and promote safe and secure working environments



Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

Milestone: 9.4 Upgrade all industry and infrastructure for increased sustainability



Goal 11: Make cities and human settlements inclusive, safe, resilient, and sustainable

Milestone: 11.1 Safe housing for an affordable cost



Goal 12: Ensure sustainable consumption and production patterns

Milestone: 12.2 Sustainable management and use of natural resources

Milestone: 12.5 Make significant reduction in the quantity of waste



Goal 13: Take urgent action to combat climate change and its impacts

Milestone: 13.3 Increase knowledge and capacity to handle climate changes

Responsibilities

How we work

Adapteo aims to be one of the most sustainable companies in the construction and real estate industry. Therefore, we have set high ambitions and long-term targets to help us guide our efforts set out by our sustainability strategy. The targets are backed by several KPIs that we follow up on a regular basis.

Adapteo strives to continuously improve its sustainability efforts and to maintain an open and honest dialogue with its various stakeholders, both in and outside the company, contributing positively to the community.

Adapteo shall continuously analyse risks and impacts with regards to people, the environment and society and maximize opportunities for internal value creation through growth, return on capital, brand, and reputation.

With the support of international standards, framework, and good practice, Adapteo shall continuously improve measures and risk management tools to ensure long-term sustainability in current and future operations.

Policy owner

All managers within Adapteo are responsible for enforcing the sustainability policy into our everyday operations. Adapteo's CEO has the overall responsibility of the policy. Any changes to this document shall be approved by the Board of Directors.

Allocation of responsibilities

The Board of Directors

Changes in regulation and our surroundings impact our sustainability efforts. Our risk enterprise model, sustainability policy and targets shall therefore be evaluated on an annual basis and any changes be approved by the Board of Directors.

Strategic responsibility

The CEO and General Management team has the overall responsibility for Adapteo's business operations, which includes the company's sustainability strategy and development. Progress and development within the area of sustainability is a standing agenda on all GMT meetings.

The finance department is responsible for annual risk assessment and mitigation measures.

Operational responsibility

Adapteo's Sustainability Council consisting of representatives from Adapteo's Business Units, R&D and Production, Strategic sourcing, Sales, Project management, HR and Group Sustainability is responsible for Adapteo's sustainability work and development. The Group Sustainability Team are responsible for coordinating and supporting the work.

The Sustainability council meets on a quarterly basis and turns strategic decisions into action by focusing on development of action plans, follow-up of sustainability targets, milestones and KPI's. The Sustainability Council is led by the Senior Vice President Marketing, Communications and Sustainability.

Implementation

Each of Adapteo's Business Units and acquired companies have the responsibility of implementing the sustainability strategy and developing local action plans and milestones for achieving our long-term targets. Adapteo's Sustainability Playbook describes how we work with sustainability and aims to help and ensure that all business units and acquired companies work in accordance with our sustainability vision and align activities that contribute to our sustainability agenda.

All Group companies are responsible for reporting on progress according to internal and reporting frameworks such as the Global Reporting Initiative (GRI).

Adapteo has developed a Sustainability Roadmap to secure we take action step by step towards our sustainability vision and ambitions.

Adapteo.