SUPPLIER CODE OF CONDUCT

Determined by	Board of Directors, Odevo AB
Application area	Odevo Group
Document owner	Odevo Group General Counsel
Date of approval	October 22, 2026

Effective date	Version	Change description
10 June 2024	V. 1.0	First version
20 October 2025	V. 1.1	Updated regarding the requirement for suppliers concerning human rights, worker management, frameworks regarding risk management, as well as Odevo's ongoing monitoring of the suppliers.
22 October 2026	V. 1.2	Added requirements for suppliers to flow down Code obligations to their own subcontractors, strengthened forced/bonded labor and data processing provisions, and made minor clarifications.

1. Introduction

Odevo Group is committed to conducting business with the highest standards of ethics, integrity, and social responsibility. This Supplier Code of Conduct outlines the expectations we have for our suppliers who provide i.a. corporate and office services as well as property management services to our group, which is then offered to our customers, primarily home associations.[1] This Code applies to all suppliers, regardless of location, and covers all subsidiaries, including those in Sweden, Finland, Germany, Spain, Portugal, Italy, Mexico, the UK, and the US.

Odevo's expectations are guided by international standards, including the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Suppliers are expected to adhere to these principles in their operations and ensure that their own suppliers and subcontractors do the same.

2. Compliance with Laws and Regulations

Suppliers must comply with all applicable laws and regulations in the countries in which they operate. This includes, but is not limited to, laws related to labor, health and safety, environmental protection, anti-corruption, data and data privacy.

Suppliers are responsible for ensuring that relevant requirements in this Code are communicated to, and followed by, their own suppliers and subcontractors where those parties are involved in providing goods or services to Odevo Group.

3. Ethical Business Practices

Suppliers are expected to conduct business with the highest ethical standards. This includes refraining from bribery, corruption, extortion, business relating to military occupation, and any other form of unethical behavior. Suppliers should promote fair competition and avoid any practices that could be construed as anti-competitive.

4. Sanctions

Suppliers acknowledge and agree to comply with all applicable laws, regulations, and international sanctions pertaining to the conduct of business. Sanctions laws means the economic or financial sanctions laws and/or regulations, trade embargoes, prohibitions, restrictive measures, decisions, executive orders or notices that have been implemented, adapted, imposed, administered, enacted and/or enforced from time to time by a sanctions authority of the European Union, United Nations, any of the Member States of the European Union and the European Economic Area, the United States, the United Kingdom, Mexico, as well as any other country where the Supplier is incorporated.

5. Occupation or political instability

[1] In Finland, property management services are managed internally by Group's employees rather than by suppliers due to the local legislation. Therefore, subcontracting does not apply to the housing management.

Suppliers must comply with all relevant laws and regulations in the countries where they operate, even in situations of short-term re-occupation. This includes but is not limited to labor laws, environmental regulations, and any other applicable legal requirements.

6. Labor Practices

a. *Child Labor*: Suppliers must not use child labor. Workers must meet the minimum age requirements established by local laws and international standards.
b. *Forced Labor*: Suppliers must not use any form of forced, bonded or involuntary labor. Workers should be free to terminate their employment with reasonable notice. Suppliers must confirm in writing, on request, that all work is voluntary and free from coercion or debt bondage.
c. *Working Hours and Wages*: Suppliers must comply with all applicable laws and regulations regarding working hours and wages. Workers should be compensated fairly for their work, and working hours should not exceed legal limits.
d. *Non-Discrimination*: Suppliers must provide equal opportunities to all employees and must not discriminate based on race, color, gender, religion, age, disability, sexual orientation, or any other protected status

Odevo Group maintains a zero-tolerance approach to modern slavery, forced labor, and human trafficking. Suppliers must ensure that these practices do not occur within their operations or supply chains. This includes prohibiting all forms of forced, bonded, or involuntary labor, ensuring fair wages, working hours, and conditions in accordance with applicable laws, and actively monitoring their own supply chains for risks of exploitation. Suppliers are expected to cooperate with Odevo's audits, assessments, and due diligence processes, and to take corrective action where risks or violations are identified.

This Code aligns with Odevo UK Limited's Modern Slavery Statement, approved by the Odevo UK Board in June 2026, and reflects our commitment under the Modern Slavery Act 2015. Suppliers are expected to uphold the principles outlined therein and ensure their staff are trained to recognize and respond to risks of modern slavery.

7. Health and Safety

Suppliers must provide a safe and healthy working environment for their employees. This includes implementing measures to prevent accidents and occupational hazards, as well as providing necessary training and protective equipment.

8. Environmental Responsibility

Suppliers are encouraged to adopt environmentally sustainable practices. This includes minimizing waste, reducing energy consumption, and using environmentally friendly materials. Suppliers should comply with all relevant environmental laws and regulations.

9. Data Privacy and Security

Suppliers must handle any customer, employee, or any other personal data pertaining to Odevo Group with the utmost care and comply with all relevant data protection laws and regulations. Where a supplier processes personal data on behalf of Odevo Group, the supplier must enter appropriate data

processing terms before processing begins and must process such data only in accordance with Odevo's documented instructions. Suppliers must implement appropriate measures to safeguard the confidentiality, integrity, and availability of such data, including measures necessary to prevent accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Odevo personal data.

10. Human Rights Due Diligence

Odevo conducts regular human rights due diligence across its supply chain, including strategic and operational risk assessments, supplier segmentation, and mitigation planning. This process is aligned with international standards such as the UN Guiding Principles on Business and Human Rights (UNGPs), OECD Guidelines for Multinational Enterprises, and the ILO Declaration on Fundamental Principles and Rights at Work.

11. Risk Assessment Framework

Suppliers are evaluated using a standardized risk model that scores ethical governance, labor practices, and compliance maturity. Suppliers are expected to cooperate with Odevo's risk assessments and provide documentation to support their ethical practices.

12. Conflict of Interest

Suppliers must disclose any potential conflicts of interest that may arise during their business with Odevo Group. They should avoid any situation where their personal interests could compromise the integrity of their business dealings with us.

13. Monitoring and Compliance

Odevo Group reserves the right to monitor and assess suppliers' compliance with this Code of Conduct. Suppliers are expected to cooperate fully with any audit or assessment conducted by Odevo Group or its authorized representatives. As part of its compliance oversight, Odevo tracks key performance indicators related to supplier conduct, including the percentage of suppliers with signed Codes of Conduct, the number of reported incidents, and the presence of whistleblower mechanisms. Suppliers may be required to provide relevant data to support these metrics and demonstrate ongoing adherence to Odevo's standards.

14. Reporting Violations

Suppliers are encouraged to report any violations of this Supplier Code of Conduct promptly. Reports can be made through established channels, and suppliers will be protected from retaliation for reporting in good faith. Suppliers may raise a concern through the Group Wide Channel via this link https://report.whistleb.com/en/WhistleblowingOdevo.

15. Consequences of Non-Compliance

Failure to comply with this Supplier Code of Conduct may result in corrective actions, including a requirement to implement an improvement plan, suspension of new business, or termination of the business relationship with Odevo Group.

16. Acknowledgment

By entering a business relationship with Odevo Group, suppliers acknowledge their commitment to adhere to this Supplier Code of Conduct.

17. Audience, ownership and review

This Supplier Code of Conduct applies to all suppliers to companies within the Odevo Group. The person responsible for this Supplier Code of Conduct is Odevo Group General Counsel.

This Supplier Code of Conduct may be updated periodically to reflect changes in laws, regulations, and business practices, and suppliers are responsible for staying informed about any changes. The latest version of the Supplier Code of Conduct will be accessible on Odevo's external website.