

Code of Conduct

Issuer organization: WA3RM AB (Org. No. 559017-5096)
Issued by: WA3RM AB Head of Legal
Approved by: WA3RM AB Executive Management
Valid from: November 15, 2023
Version: 1.1

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Code of Conduct introduction

Why we have the Code of Conduct

The Code of Conduct has been adopted by WA3RM AB (WA3RM) to emphasise the purpose, values, and principles that guide our actions with our employees, suppliers, investors, customers, business partners, and other stakeholders. It serves as a foundation for all WA3RM's policies, rules, partnerships, and activities.

What the Code of Conduct is based on

Our Code of Conduct is based on our brand and its purpose, values, and principles, which guide our everyday actions. Our purpose, values, and principles guide us to conduct business ethically, responsibly, transparently, and sustainably. Everything we do should reflect our purpose, values, and principles outlined in the Code of Conduct.

Understanding the Code of Conduct

To make things easier to understand for our employees and other stakeholders, the WA3RM Code of Conduct displays our purpose, values, and principles as well as our minimum ambitions in a range of important areas including:

- **Social responsibility:**
 - Human rights and fair work conditions
 - Diversity, equality, and inclusion
 - Health, safety, and well-being
 - Partnerships and social commitments
 - Communication

- **Environmental responsibility:**
 - Greenhouse gas emissions
 - Energy
 - Water
 - Waste
 - Transport
 - Purchased goods

- **Financial responsibility:**
 - Business and accounting
 - Quality
 - Information management
 - Procurement
 - Anti-corruption and anti-bribery
 - Hospitality and gifts
 - Conflicts of interest

Code of Conduct alignment with laws and frameworks

Should the laws of an individual country be more restrictive than the requirements in this Code of Conduct, the individual country's laws shall apply.

The Code of Conduct is based on international frameworks, primarily the Ten Principles of the UN Global Compact and the UN Sustainable Development Goals. According to the Ten Principles, all companies must support several basic guidelines pertaining to human rights, labour, environment, and anti-corruption. Links to the UN Global Compact Ten Principles and the UN Sustainable Development Goals can be found in the Appendix of references.

Who the Code of Conduct applies to

The Code of Conduct applies to all our employees in all countries where WA3RM conducts business. It applies to full-time employees, but also to all contract employees, part-time employees, temporary employees, consultants and agency workers. This Code of Conduct also applies to various external stakeholders of WA3RM, including those who contribute financially to our business activities such as investors, industry partners, or other funding partners. Elected officials, public sector employees, policy makers, academic partners, and research organizations that support WA3RM in other non-financial capacities are also encouraged to follow this Code of Conduct.

Our managers have a particular responsibility to always set a good example and ensure compliance with the Code of Conduct. Accordingly, all WA3RM managers have a responsibility to inform their organisation about the Code of Conduct and present its content. Managers must ensure that their employees comply with the Code of Conduct and report any behaviour that is not compliant to the WA3RM Head of HR. Each individual employee also has a reporting responsibility. Non-compliance to the Code of Conduct may lead to disciplinary action.

Reporting misconduct

WA3RM employs a non-retaliation approach to reporting of misconduct, such as breaches to national laws, local laws, our Code of Conduct, or contractual obligations. We want our employees, partners, and other stakeholders to feel empowered to report any misconduct immediately. By encouraging reporting of misconduct, we aim to protect our business and its reputation. Misconduct should be reported to the WA3RM Head of HR. Appropriate action will be taken based on the findings of investigations.

Revision of the Code of Conduct

The Code of Conduct is reviewed regularly, at minimum once every year, to ensure it is adapted to fit the needs of WA3RM and our business activities. The original Code of Conduct has been adopted by the Board of Directors of WA3RM AB and can only be suspended or amended with approval by the Board of Directors of WA3RM AB.

Guiding purpose, vision, and principles

Bringing waste to life

WA3RM's purpose, vision, and principles are the general beliefs and rules that guide all our actions. Our purpose, vision, and principles guide our attitude, actions, and how we interact with each other, our customers, and our other stakeholders.

Purpose

The purpose of WA3RM is to enable and nurture growth and new possibilities, technologically and financially. Most people view unwanted materials or by-products as problems, unnecessary costs, or inconveniences. We see waste streams as valuable, untapped resources. Our regenerative projects aim to safeguard life on this planet, vitalize local communities, and secure a sustainable future.

Vision

WA3RM's vision is to "Build a world where progress is based on sustainable circularity". With this vision we aim to design and construct regenerative systems and introduce paths to circularity. We strive to create building projects which produce resources such as food, fuel, or fertilizer using circularity, reuse of waste streams, and avoiding and reducing emissions where possible. We aim to be a leader in creating advancements and developments to improve conditions for people, businesses, societies, and our planet.

Principles

"Agile and firmly rooted"

As pioneers in an increasingly circular world, we are visionary thinkers. We embrace creativity, new ideas, and imagination. Our outlook on the future is fundamentally positive and we approach challenges with an open mind. Still, we know that our path to success is firmly rooted in sound knowledge, technologies, and strategy.

"No time to waste"

It's not too late to slow down the pace of climate change, but time is of the essence. Wasting it is just as bad as wasting other precious resources. That's why we strive for efficiency and a sense of urgency in everything we do. We strive to get things right from the beginning, be quick to make decisions, and never hesitate to act. And we bring this way of thinking and working into all our partnerships.

"Grow together"

Collaboration is our lifeblood. We bring disparate industries, organizations, and the society together to create sustainable value for everyone, including our planet. In everything from greenhouses, businesses, and societies to individuals, growth happens when the conditions are right. That's why we nurture an environment where ideas can be shared freely, communication is forthright and supportive, and people are empowered to make a difference. All part of the same circle, we grow together.

“Please copy us”

Life on this planet needs us to take bold steps to prevent climate change. Our regenerative business model has the power to make a real impact. It is, however, tied to local communities and to create the global impact we desire, we strive to make it easy to copy us and use our model wherever possible. In addition, to gain real momentum, we strive to generously share our knowledge and insights to inspire others. WA3RM also does not patent any of its designs or technology.

Social responsibility

Human rights and fair working conditions

Basic human rights must be recognised, respected, and applied equally for all our employees and the employees of our partners, and other stakeholders.

All employees have the right to join trade unions and organisations and to engage in collective bargaining agreements.

We do not tolerate any forms of modern slavery, such as forced labour, bonded labour, child labour or human trafficking. We respect children’s rights to personal development and education, and we do not tolerate any forms of child labour. Minimum legal working ages must be respected in all countries of operation.

We do not tolerate the purchase of sexual services, regardless of when it occurs. This includes any payment for sexual services or visits to pornography or strip clubs. This applies regardless of the country or whether such conduct is permitted or prohibited in that country.

All our employees and the employees of our business partners and other stakeholders shall be paid at least the minimum wage applicable in the relevant country, or what is considered a living wage in countries which do not have a minimum wage. Local regulations must also be respected regarding standard work hours (daily, weekly, monthly, and annually), over-time work hours (daily, weekly, monthly, and annually), consecutive days of work, holidays, parental leave, sick leave, and other social benefits.

Diversity, equality, and inclusion

WA3RM strives to be a diverse, equal, and inclusive company and understands that people’s differences contribute to an attractive and dynamic workplace. We aim to provide a work environment where differences are respected and appreciated. All our employees and the employees of our business partners and other stakeholders should feel a sense of equality and inclusion.

We strive to ensure that our workplaces reflect the diversity among our various stakeholders and society. All existing and potential employees must be treated fairly and without prejudice regardless of gender, age, race or appearance, transgender identity or expression, sexual orientation, disability, religion, union membership, political views or other beliefs. We do not tolerate discrimination in conjunction with recruitment, salary selection, performance reviews, promotions, termination of employment, or in our everyday actions.

No employee is to be subjected to victimisation, such as bullying, psychological abuse, social exclusion, sexual harassment, or other forms of physical or verbal harassment or abuse. Recruitment, development activities, and promotions must be conducted based on competence, qualifications, skills, and performance.

Health, safety, and well-being

WA3RM strives to provide a healthy, safe, and positive work environment for all our employees, and we encourage our business partners and other stakeholders to also provide this for their employees.

As an employer, we take full responsibility for the work environment, and we take a systematic approach to health and safety issues. We strive to create a physically, psychologically, and socially healthy workplace that offers development opportunities for all employees and where the risk of work-related injuries and sickness is minimized or ideally avoided.

Managers are responsible for ensuring health, safety, and well-being for their employees. Our managers are responsible for providing instructions, ensuring that they are followed, and establishing an understanding of necessary safety measures. All our employees must take responsibility for their own safety when performing work tasks, must comply with safety regulations, must take relevant precautionary measures to help prevent accidents, must report risks, and must report deficiencies in the work environment to their manager.

In the case of workplace accidents, incidents shall be reported internally within 24 hours to the Human Resources function centrally and must be reported to external authorities if required by regulation. Such workplace accidents shall be documented and followed by an investigation into the root cause and corrective actions to help avoid future accidents. Work adaptation and rehabilitation are also to be provided for employees returning to work after an injury.

WA3RM has a zero-tolerance approach to drugs and alcohol. An alcohol-free and drug-free workplace is a necessary requirement for our employees' security, work climate, health, safety, and well-being.

WA3RM strives for all employees, business partners, and other stakeholders to act in accordance with all applicable traffic and vehicle regulations in the country in which the vehicle is being operated. All employees operating vehicles shall have a valid vehicle license and have access to sufficient rest time according to local regulations. This applies to use of both company-owned vehicles and privately-owned vehicles if the travel is related to work.

Partnerships and social commitments

WA3RM strives to contribute to the positive and sustainable development of society through our partnerships and interaction with suppliers, tenants, investors, industry partners, elected officials, public sector employees, policy makers, consultants, academic partners, and research organizations. WA3RM's partnerships shall always contribute to generating business and customer value, but should also strive to generate benefits for other stakeholders such as local communities, charities, NGOs, and any other parties involved in the co-creation of

WA3RM's projects. Our partners must work in compliance with applicable legislation and this Code of Conduct.

Communication

Communication activities at WA3RM strive to support our vision, strategy, and business activities. Our communication aims to strengthen our stakeholders' confidence in the company and the brand and create business and customer value. We must comply with the marketing legislation and regulations in the countries in which we operate. We must also work to achieve clear and honest communication. WA3RM has an obligation to supply our investors with relevant, reliable, correct, and up-to-date information in accordance with applicable laws and regulations. Our information and communication are based on openness, clarity, relevance, availability, and a proactive approach.

Environmental responsibility

WA3RM strives to minimize its negative environmental impacts and maximize its positive environmental impacts. WA3RM considers both upstream and downstream environmental impacts in our entire value chain. The following principles listed below we consider to be our most significant environmental impacts and are related to greenhouse gas emissions, energy, water, waste, transport and purchased goods such as building materials. Consideration of these impacts shall be integrated into WA3RM's various business activities and shall contribute to creating sustainable value for our stakeholders. Data related to these environmental impacts will be collected internally on a quarterly basis, and will be reported publicly on an annual basis.

Greenhouse gas emissions

WA3RM, through its projects, strives to abate significant amounts of greenhouse gas emissions and therefore contribute to combatting climate change. WA3RM strives to utilize industrial waste streams to locally produce food and other goods which have comparatively lower greenhouse gas emissions than the average versions of such goods available in the current local market. Local production of food and other goods also can help reduce transportation needs if the average versions of such goods are normally imported from more distant regions.

Energy

WA3RM, through its projects, strives to be as energy efficient as possible. WA3RM strives to utilize waste energy in the form of waste heat from industry partners to produce food and other goods. WA3RM also strives to minimize heating and electricity needs in its projects. Furthermore, all purchased electricity shall be sourced from fossil-free sources. These efforts contribute to minimizing the negative impacts related to energy production and consumption.

Water

WA3RM, through its projects, strives to be as water efficient as possible. WA3RM strives to utilize rainwater significantly when possible. WA3RM also strives to minimize overall water consumption by utilizing circular closed-loop water systems in its projects where possible.

These efforts contribute to minimizing the negative impacts related to water consumption and wastewater treatment.

Waste

WA3RM, through its projects, strives to be resource efficient and produce as little waste as possible. WA3RM strives to utilize waste streams from industry partners when possible. WA3RM also strives to minimize the waste which we produce at our own project facilities and find smart, local solutions for re-using or recycling such waste. These efforts contribute to minimizing the negative impacts related to waste treatment.

Transport

WA3RM, through its projects, strives to minimize transport needs and utilize fossil-free transport when possible. WA3RM strives to minimize transport needs by renting local asset facilities which will be used to produce food and other consumer goods for local markets, which otherwise would be imported from more distant geographic locations. These efforts contribute to minimizing the negative impacts related to transport purchased by WA3RM and by our partners.

Purchased goods

WA3RM, through its projects, strives to be resource efficient and select suppliers based on objective environmental criteria. WA3RM and our partners strive to minimize consumption of fertilizers, feeds, chemicals, and other inputs. We also strive to procure such inputs from local suppliers or local waste streams when possible. WA3RM also selects suppliers and partners for construction, building materials, lighting and other goods based on objective environmental criteria. These efforts contribute to minimizing the negative impacts related to purchased goods and services, purchased either by WA3RM or by our partners.

Financial responsibility

Business and accounting

All business activities shall be ethical, transparent, and contribute to our obligations. Business activities must comply with relevant laws, relevant frameworks, signed agreements and contracts, and our Code of Conduct. We strive to build long-term business relationships that allow us to work with trustful business partners to create a platform for achieving strong financial results.

All financial transactions are to be recorded in accordance with the WA3RM's accounting policies and comply with applicable laws, rules, and standards. Our accounting records should show all types of transactions in a correct and non-misleading manner and our external financial reporting should be reliable and comprehensive.

Quality

Maintaining a high quality of our services and products and a high quality of service for our customers are crucial for continued positive development. We strive to fulfil our promises and be an exemplary partner that develops together with our customers and partners.

We strive to deliver our services and products timely, transparently, and with the level of quality promised in order to maximise the value and benefits for our customers. We conduct a continuous dialogue with our customers regarding their requirements and we listen to their needs. We employ effective procedures for consistent and regular communication with customers and partners.

Information management

Information security is to be an integrated part of the business operations and contribute to creating value for our stakeholders.

Information shall be available as required for the success of WA3RM's business activities. The information shall be current, correct, and complete with only limited accessibility for those employees or other stakeholders which need it. Information must be traceable with the possibility to identify who has had access to the information, what changes have been made, and who made such changes.

We shall comply with applicable legislation, such as GDPR, as well as other requirements from customers, suppliers, and other stakeholders. Internal WA3RM employee's personal data shall be managed by the WA3RM HR function, in compliance with GDPR legislation. External partner's personal data shall be managed by the relevant WA3RM staff, in compliance with the relevant and applicable non-disclosure agreements and work agreements.

We respect people's fundamental right to a private life. Personal data is to be collected in a correct and lawful manner, be relevant for the purpose for which it was collected and be processed with the utmost caution.

The risks to which we are exposed in information management shall be carefully considered and accepted by the individual or individuals who will be impacted if the risk occurs. We are to coordinate company-wide work by using the same terminology, standards, and methods in this area whenever possible. We are to include information security in our processes, services and systems based on the risks to which we are exposed. We shall be prepared and ready to handle incidents related to IT operations. Accordingly, we shall have plans in place to resume normal operation as quickly as possible. We shall continuously follow up, revise and improve our operations from an information security perspective.

Procurement

The procurement activities of WA3RM must always be conducted responsibly. Through responsible purchasing, we strive to ensure ethical, transparent, and long-term business relationships with suppliers.

We expect our suppliers to comply with relevant legislation, international frameworks, and this Code of Conduct. We take a risk-based approach and have sustainability requirements for our suppliers as well as the services and products we purchase.

We shall always have clear written supplier agreements and contracts, diligently ensure supplier compliance to laws and our Code of Conduct, and take action in the event of supplier non-compliance. All suppliers must follow our Code of Conduct to confirm their compliance prior to formation of contracts. WA3RM reserves the right to perform remote audits, on-site audits, or third-party audits of its suppliers.

Anti-corruption and anti-bribery

Corruption and bribery are not tolerated in any form. Corruption refers to the abuse of entrusted power for private gain, often affecting decisions and activities. Bribery refers to corrupt solicitation, acceptance, or transfer of financial value or other forms of value in exchange for action.

This includes embezzlement, bribery, money laundering, offers of or acceptance of kickbacks, gifts or business entertainment that is regarded as extravagant or so called “facilitation payments”, blackmail, fraud, nepotism, and cronyism. No employees are permitted, through their position or role in the business, to demand or make personal gain in the form of gifts, offers, or goods. All business entertainment is to be moderate in nature and characterised by good judgement, so all parties retain full credibility and independence from each other.

Hospitality and gifts

Gifts such as entertainment, travel, and accommodation for or from external public sector stakeholders or external private sector partners shall not be accepted. Food or drinks purchased by or for external public sector stakeholders, such as policy makers, regional staff, municipal staff, city staff, or other elected officials, shall not be accepted. Food and drink by or for external private sector stakeholders, such as investors, suppliers, tenants, consultants, industry partners or other private stakeholders are permitted if within reasonable boundaries of cost and frequency. Reasonable cost and frequency are to be characterised by good judgement and shall not improperly influence business decisions.

Conflicts of interest

Conflicts of interest are not tolerated in any form. Conflicts of interest occur when there is a conflict between personal interests and our responsibilities as employees of WA3RM, which could result in personal benefit. Conflicts of interest may be related to hospitality, entertainment, gifts, charitable contributions, political contributions, and other forms of involvement with entities that engage in business with WA3RM.

All employees who are directly or indirectly connected with any of our external partners or stakeholders may not participate in related partnerships, may not influence any related decisions regarding the partnership, and related financial transactions. Employees shall not engage in activities that create a definite conflict of interest, shall avoid situations that may create a possible conflict of interest, and shall report potential or existing conflicts of interest to management.

Equity and loan investors

WA3RM selects its investment and lending partners with a high level of care. WA3RM selects investors and lending partners that do not operate in industries, business areas, or geographic areas which may present significant sustainability risks or challenges. WA3RM makes such selections based on various parameters including but not limited to financial stability, sustainability performance, and engagement with activities that could harm society. WA3RM does not partner with investors or lenders that fail to uphold international laws and norms concerning human rights, labor, the environment, and anti-corruption. WA3RM also does not partner with investors or lenders who are actively engaged with companies in the following industries: weapons or war materials, tobacco, alcohol, recreational cannabis, pornography, and gambling. Weapons or war materials refer to anti-personnel mines, cluster munitions, chemical weapons, nuclear weapons, and biological weapons. WA3RM acknowledges the need for divestments from fossil fuel related business activities, and therefore considers investors and lending partners which are involved in such business activities to a reasonable extent and if the partner displays clear ambition to divest from fossil fuel business activities in line with recommendations from the IPCC.

Appendix of references

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