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CODE OF CONDUCT



CODE OF CONDUCT

– LETTER FROM PRESIDENT AND CEO

Sweco's Code of Conduct clarifies how we should act and our responsibilities towards customers, competitors, colleagues, shareholders and society at large.

Our Code of Conduct is the foundation for how we operate and it guides us in maintaining trust and credibility with our stakeholders.

The Sweco Code of Conduct applies to all parts of the Sweco Group and shall be respected by all employees. We also expect that our business partners act in the same responsible way.

Compliance with the Sweco CSR policy and the Code of Conduct is a matter for the Executive Management of the group, for managers at all levels as well as for the individual employee.

I encourage you to read the Code of Conduct carefully. I expect everyone to work and act in line with the Code of Conduct at all times.

Stockholm April, 2015

Tomas Carlsson
President and CEO, Sweco



THE PURPOSE OF SWECO'S CODE OF CONDUCT

Sweco's engineers, architects and environmental experts work on projects that impact societies as well as people's everyday lives. This sets high standards in terms of ecological, ethical and socio-economic considerations. Our ambition to contribute to a sustainable development of society serves as a basis for our actions.

All of Sweco's employees represent the company's corporate brand and reputation. Not only by the solutions we create, but also through our behavior and the expertise that we convey to those around us, both at work and privately. To comply with existing laws, rules and regulations is an absolute requirement for all of Sweco's employees. We respect anti-corruption laws, competition rules, labour market laws and any other regulations or provisions applicable for our operations. But how to deal with ethical and moral issues is not always determined by law. Our values and consideration for customers, competitors, colleagues, shareholders and society guide our actions. Therefore, we also need to provide further guidance on business ethics by clarifying what is required from us.

This is the purpose of Sweco's Code of Conduct. The Code of Conduct clarifies how we should act and our responsibilities towards colleagues, customers, shareholders as well as towards society at large.

The Sweco Code of Conduct applies to all parts of the Sweco Group and shall be respected by all of Sweco's employees. We expect that our business partners act in the same responsible way.

Sweco's CSR Policy, available on www.swecogroup.com, defines our general principles in regards to CSR matters. The Code of Conduct is based on these principles and provides additional guidance and direction on our approach to society. Sweco also has internal guidelines and procedures concerning business ethics that provide additional guidance to our employees.

Compliance with the Sweco CSR policy and Code of Conduct is a matter for the executive management of the Group, as well as for managers at all levels in the group down to the individual employee.

THE CODE OF
CONDUCT REFLECTS
OUR VALUES



Sweco's vision to become Europe's most respected knowledge company in the fields of consulting engineering, environmental technology and architecture includes more than developing and implementing projects that are outstanding. At the same time, we are also developing and building relationships with our customers, business partners and colleagues – based on respect and responsibility.

To achieve our vision requires clarity in how we do business. As Sweco employees we are responsible for building and managing that clarity, guided by Sweco's values.

SWECO'S VALUES

CURIOSITY

The willingness to learn and take advantage of new knowledge motivates me in my efforts to solve the customer's challenges. I take the initiative and have the courage to try new ways, in order to constantly develop the business and myself as a person and remain at the forefront of my profession.

COMMITMENT

I enjoy working with my colleagues and our customers. I am passionate about creating the best solutions that create lasting value for our customers and society. Our diversity enriches our cooperation and the solutions we create. The sum of our total effort by cooperation is greater than each person's individual contribution.

RESPONSIBILITY

I take responsibility for my actions and act in line with applicable laws, regulations and Sweco's business ethics policies. I also take responsibility for ensuring that an assignment maintains the same high quality throughout. I strive for solutions that are sustainable and profitable both for the customer and for Sweco. I share my knowledge and my experience with my colleagues and have an open mind for learning from others. I am adaptable and straightforward to deal with and work effectively.

**OUR WAY OF DOING
BUSINESS DEMONSTRATES
OUR VALUES IN ACTION**



Sweco's business model is based on simplicity and customer focus with the goal that it should be easy to do business and have a business relationship with us.

As Sweco employees we collectively create the brand and reputation of the company by the way we behave and through what we convey to those around us.

We operate in a decentralised, customer-driven organisation that places high demands on corporate responsibility as well as on the responsibility of every employee. We conduct our business within the framework of applicable professional standards, national laws, and regulations together with Sweco's policies and standards. However we also recognise that ethical and moral practise cannot always be determined by laws and regulations. The Sweco Code of Conduct therefore helps us to define how we should behave and conduct business in a wide range of settings and situations.

Each of us is expected to know, understand and follow the Code of Conduct and the values on which it is based. We also have an obligation to help others do the same. The Code of Conduct provides guidance about the standards of integrity and business conduct, but is at the same time no substitute for our personal responsibility and accountability to use good judgment and obtain guidance on proper business conduct. When in doubt we seek additional guidance and support from colleagues, managers or Sweco Group Legal, HR or Communication.

Sweco's regulations, policies and Code of Conduct apply to all countries where we operate.

FOUR DIMENSIONS OF SWECO'S CODE OF CONDUCT



All employees are all responsible for ensuring that Sweco's relationships with and approach towards customers, society, competitors and business partners as well as colleagues, are characterised by integrity, professionalism, respect and high ethical standards.

DIMENSION: CUSTOMERS

Our customers are central to everything we do. Our existence as a company is based on adding value to our customers' business.

Since customers seek our knowledge and expertise, we are responsible for keeping ourselves up to date with the latest developments in our respective areas of expertise.

We should be approachable and committed in our relationships with our customers. We meet our contractual obligations, report and charge as agreed for our services. We always respect the confidentiality and privacy of our customers.

We do business in a proper manner and customers can always rely on the information that we provide. This responsibility also includes working together with responsible business partners. It is unacceptable and strictly forbidden for any of us to engage in fraud, collusion, corruption or coercive practices or to solicit, accept, offer, promise or pay bribes.

Moderation and good judgement should characterise our view on gifts and entertainment. We understand that the existence of an industry-wide practise can not be taken as an implied approval.

We shall not offer or accept such things that may question our sincerity or our ethical way of doing business. All gifts and entertainment should be easy to associate with our business.

DIMENSION: SOCIETY

Sweco conducts responsible and sustainable business. This means that we always act in a socially and environmentally responsible manner, within the laws of the countries in which we operate and that we support and respect basic human rights (as defined by the UN in "The Universal Declaration of Human Rights").

It also means that we maintain dialogue and cooperate in order to contribute in a responsible manner to the development of communities.

We represent Sweco in a way that strengthens our reputation and is in line with our brand, regardless if it is media, events or other external representation.

We are committed to supporting international and local efforts to eliminate corruption and financial crime. We shall never commit to activities that we cannot defend or account for, and we shall not make decisions based on personal interests or improper relationships.

DIMENSION: COMPETITORS

Sweco believes that competition is important for business development and innovation. We shall compete in accordance with the legislation of each country, and support proper and unrestricted competition in our own proposals, suppliers' tenders and the procurement processes around them.

Sweco employees shall not participate in prohibited anti-competitive activities, e.g. illegal price-fixing agreements, market sharing or abuse of a dominant position. It is strictly forbidden to gain advantage using methods that could be construed as bribery or kickbacks, regardless of whether it only benefits the company and not the employee.

Sweco's employees are not permitted to work for or indirectly conduct services for an organisation that competes with or does business with Sweco. The employee's line manager should be contacted for guidance in this respect.

DIMENSION: COLLEAGUES

The safety of all Sweco employees is a top priority. This is a responsibility shared by Sweco as an employer and Sweco's employees. All employees may receive support from the HR-department to find solutions to problems related to the workplace.

We recognise, that as Sweco consultants and employees, we are all players on the same team. This means that we are loyal to and stand by our colleagues. We treat our colleagues with respect, dignity, fairness and courtesy. We are professional in our attitude to each other, we keep our promises and deliver what we have promised on time, and if any obstacles should arise, we inform those affected.

We are committed to a working environment free from discrimination, harassment and retaliation. We foster open communication where everyone's opinion is respected. Once a decision is made, we respect it and act together in accordance with the decision.

COMPLIANCE WITH AND MONITORING OF THE CODE OF CONDUCT



COMPLIANCE WITH THE CODE OF CONDUCT

Everyone at Sweco is responsible for following the Code of Conduct and for helping others to do so as well.

Managers at Sweco have a particular responsibility in always leading by example and in ensuring that the Code of Conduct is put into practice. All managers are responsible for making sure that employees, business partners, and other relevant parties are informed about the Code of Conduct. In the case of employees this should be a part of recruitment, introduction and during performance reviews.

All employees are responsible for encouraging our business partners to act in accordance with the Code of Conduct.

MONITORING OF THE CODE OF CONDUCT

Monitoring compliance with the Code of Conduct is part of our everyday business. Sweco employees must report any violations of business ethics that arise in their course of work, even if Sweco is not directly involved or party to the

relevant agreement. This can be done by talking to the line manager, the line manager's manager, HR Department or Group Legal Counsel. In addition, employees can report breaches of business ethics on an anonymous basis to Sweco Ethics Line, our external and secure business ethics reporting system.

IN THE CASE OF VIOLATION AGAINST OUR REGULATIONS

When non-compliance with Sweco's Code of Conduct is reported or suspected, measures will be taken to investigate and, if appropriate, remedy the situation.

Those who violate the Code of Conduct or any other law or policy will be subject to appropriate disciplinary action, which may include termination of employment.

If any of Sweco's business partners violates our Code of Conduct, we consider this to be reason for terminating our business relationship.

FRAMEWORK FOR ETHICAL BEHAVIOUR AND DECISION MAKING

Use these questions as a support when there is uncertainty about the correct ethical course of action. The answers will provide guidance.

1. Could it be illegal in any way?

2. Is it against Sweco's culture and way of doing business?

3. Could it possibly have a negative effect on Sweco's or your customer's brand?

4. Are there any possible effects on parties other than Sweco and your customer to consider?

5. Would acquiring more information help you to make a decision?

6. Would it help explaining the dilemma to a colleague in order to get a second opinion?

7. What would the ensuing public opinion be if your actions were reported in the media?

8. Is it fair play towards our competitors?

9. Is it compatible with common sense and good judgement?

10. Does it feel right?

PRACTICAL TOOLS FOR DAILY USE

CSR-POLICY

The CSR-policy is Sweco's backbone document regarding business ethics. It describes Sweco's overall view on CSR matters, lists our commitments and the international agreements we have signed and are obliged to follow. The CSR-policy is to be found on <http://www.swecogroup.com/en/Sweco-group/About-Sweco/Responsibility/CSR/>

SWECO'S CORPORATE SUSTAINABILITY STATEMENT

Our sustainability statement describes our approach to sustainability and it can be found on www.swecogroup.com

Further information about our role as a company in connection with sustainable development can be found on World Business Council for Sustainable Development website www.wbcsd.org. Sweco has been a member of WBCSD since 2013 and has the strategy to further develop and deepen the role of businesses in sustainable development by way of its contributions to this organisation.

SWECO ETHICS LINE

Behaviour that is, or for good reasons can be perceived, as a violation of law or the Code of Conduct shall be reported.

Sweco has an internal process for reporting breaches of business ethics using our external and secure business ethics reporting system. All reports are treated with confidentiality and anonymously if desired.

Contact details for Sweco's Ethics Line can be found on Sweco intranet.

FIDIC CODE OF ETHICS

The International Federation of Consulting Engineers (FIDIC) recognises that the work of the consulting engineering industry is critical to the achievement of sustainable development of society and the environment. As member firms through the individual nation Member Associations we share the view that the principles, as described in the FIDIC Code of Ethics, are fundamental to our behaviour if society is to have the necessary confidence in us as advisors. The Code of Ethics is to be found at <http://fidic.org/node/743>



