

ICA GRUPPEN

Code of Conduct



Content

CEO Message – Making everyday a little easier with integrity	03
Introduction to the Code of Conduct.....	04
Our values.....	05
Our business principles.....	06
Implementation and compliance	12
Guidance and reporting	12
Updates and reviews.....	12



Welcome to our Code of Conduct

ICA's vision is to make every day a little easier.

Our customers expect us to understand the constantly changing landscape of our businesses and that we are proactive, reliable, and innovative in relation to our surrounding world and in our customer relations.

For us to deliver a great customer experience, as well as being a great place to work at, we need a common framework, and we need to trust each other. Therefore, we have our values and with them as a foundation we have developed our Code of Conduct. Embracing the principles of our Code of Conduct guides us in how we shall act as individuals and as a company; it supports us in making the right decisions. It is about how we behave with respect towards each other, how we do our business with integrity and responsibility and how we contribute to a sustainable society.

In short, our Code of Conduct is what is common sense to us at ICA. It guides us in what is right and what is wrong. It helps us to build trust and with trust comes success. Our promise is manifested in how we do things, our attitude and mindset. We are proactive, reliable, and innovative.

We make every day a little easier with integrity.

Nina Jönsson
CEO ICA Gruppen AB (publ)
June 2025

Introduction

ICA's Code of Conduct ("CoC") consists of our values and business principles and outlines our commitment to conduct sustainable business in a responsible, efficient, and transparent manner.

Our CoC shall be used as a guide in our day-to-day business and be integrated into key goals, practices, decisions, and activities. Use common sense and good judgment in applying this policy. Our CoC does not cover every situation that may arise. Additional information, including references to relevant internal steering documents, are highlighted in the policy.

Our CoC applies to all employees, consultants and board members of ICA ("ICA Personnel"). We expect all to adhere to these principles and to report any violations or concerns. Throughout this policy, "ICA" or "ICA Gruppen" refers to ICA Gruppen AB and its direct or indirect subsidiaries and affiliates.



Our Compass for Decision-Making

Our decisions need to stand the test of time. Before taking action, ask yourself:

- Is the action legal?
- Does it comply with the CoC and our values, corporate policies, and guidelines?
- Am I comfortable with the decision or action? If others outside of ICA became aware of my action, would I still feel comfortable?
- If my action was reported to the media, would I still feel comfortable with my decision?

If the answer is Yes to all the questions above, you can proceed.

If the answer is No to any of these questions or any of them makes you uncertain, consult with your manager or, if you are more comfortable, with another manager, HR, Communication or Group Legal.

Our Values

Our values are at the heart of our culture and identity. They guide our actions in our daily work along with our business principles. Our values are:

SIMPLICITY

WE THINK SIMPLY FIRST ICA Gruppen's vision is to make every day a little easier. Choosing to think simply first is important to us at ICA. For us, simplicity is also an approach that involves being clear and honest, and trusting each other. This makes it easier to perform well together. When we allow simplicity to characterize the way in which we work, we can be even more efficient and swift. This results in the best solutions for the customers and provides us with clarity and speed in our day-to-day work.

ENTREPRENEURSHIP

WE CREATE OPPORTUNITIES Here at ICA, we believe in and are driven by the power of entrepreneurship – individually and together. Succeeding in business is about seeing and creating opportunities; it's about drive, innovation and the desire to take on responsibility. Entrepreneurship also means having the courage to try new things and the desire to constantly improve. This is what enables us to keep developing and improving. When we identify a new need we can meet for our customers, we create new opportunities for our business.

COMMITMENT

WE MAKE A DIFFERENCE We are committed to our customers, and we develop together. This is how we make a difference. Our commitment can also make a difference in other ways; commitment to our work leads to better results and commitment to each other creates a sense of community. When we believe in each other, we perform at the highest level. We believe in more than providing good products and services – we are committed to do good things in the world around us for a sustainable and better world.



Our Business Principles

Extending our values into practice, we build our commitment to responsible business practices and acting in compliance with a set of business principles. Most of our business principles are further described in internal steering documents.

We comply with laws and regulations

ICA Gruppen is committed to conducting its business ethically, responsibly, and in compliance with all applicable laws and regulations. We shall comply with all applicable laws and regulations governing our businesses in the retail, pharmacy, real estate, banking, and insurance sectors. We will also stay informed about changes in legislation and adjust our practices to remain compliant.



Our commitment at our workplace

Our people, workplace and assets



1.

We respect human and labor rights

We respect the rights of our employees, and we provide fair working conditions.

2.

We encourage well-being and safety at work and a healthy lifestyle

We aim to offer a physically and psychologically safe workplace environment for our employees and to promote a healthy lifestyle that increases employee well-being. We always strive to prevent work-related accidents or occupational illnesses. We are committed to continuously developing a work environment that enables sustainable performance where all employees can deliver at their best.

3.

We treat all employees respectfully and inclusively

We recognize that our differences are our strengths and aim to create an inclusive culture. We respect one another and base employment decisions on abilities or performance regardless of factors such as age, ethnicity, gender, sexual orientation, or cultural identity. We cultivate a workplace that is fair, respectful, and free of discrimination, harassment, intimidation, and favoritism.

4.

We handle personal data in a responsible manner

We handle personal data in a responsible and secure manner in accordance with privacy law and stakeholders' expectations. We are committed to remaining a trustworthy processor of personal data and to respect and safeguard the privacy of our customers, partners, employees, and other stakeholders.

5.

We apply uniform and general accepted accounting principles

We record all financial transactions in accordance with IFRS general accepted accounting standards. We report truthfully on environmental, social and governance areas and any non-financial information that we have an obligation or expectation to disclose according to CSRD and related ESRS reporting standards. We maintain proper financial controls and fraud prevention to ensure that our financial information is honest and reliable and that our funds are used in the best interests of ICA.

6.

We carefully manage company assets

We protect our assets, including physical property, intellectual property, and financial assets, from damage, theft, or misuse.

7.

We protect confidential information

We protect our confidential information from unauthorized or accidental access, disclosure, misuse, improper alteration, loss, or destruction. We do not share such information with third parties unless you have been specifically authorized to do so.

8.

Our commitment to responsible use of AI

We acknowledge the transformative potential of AI and are committed to using it responsibly, ethically, and in compliance with applicable laws and regulations. We strive to ensure that use of AI within the ICA Group adheres to our high level of business standards and ensures transparency, fairness and inclusivity. Our use of AI respects privacy, safeguards human rights and maintains accountability.



Our commitment in the market

Our business, customers and suppliers



9.

We engage with third parties who share our commitment to responsible business practices

We expect our suppliers and partners to follow the intentions of this CoC whenever applicable and act in an ethically responsible way. We consider this an important criterion when establishing or continuing our business relations.

10.

We are committed to ensure the safety and quality of all our products

We understand that the trust of our customers rests on the safety and quality of our products. We are committed to upholding the highest standards of product safety, quality assurance, and regulatory compliance across all our offerings.

11.

We have zero tolerance towards bribery and are cautious when accepting hospitality or gifts

We make sure that business gifts and hospitality are openly disclosed, of reasonable value and appropriate to the nature of the business relationship. We do not give or accept gifts or other remuneration if it can be perceived that its purpose is to improperly influence a business decision.

12.

We act in the best interest of ICA

We act in the best interest of ICA and make sure that all our decisions inspire trust and are made without the influence of private interests or other loyalties. We avoid situations that create potential or perceived conflicts of interest between our personal interests and the interests of ICA.

13.

We compete in a fair manner

We compete in a fair and honest manner, without engaging in any inappropriate activities or unfair trade practices. We must never agree or collude with competitors, customers or suppliers in a way that improperly influences the marketplace or the outcome of a bidding process in breach of competition laws. We only collect and use information about our competitors in a legal and ethical manner.

14.

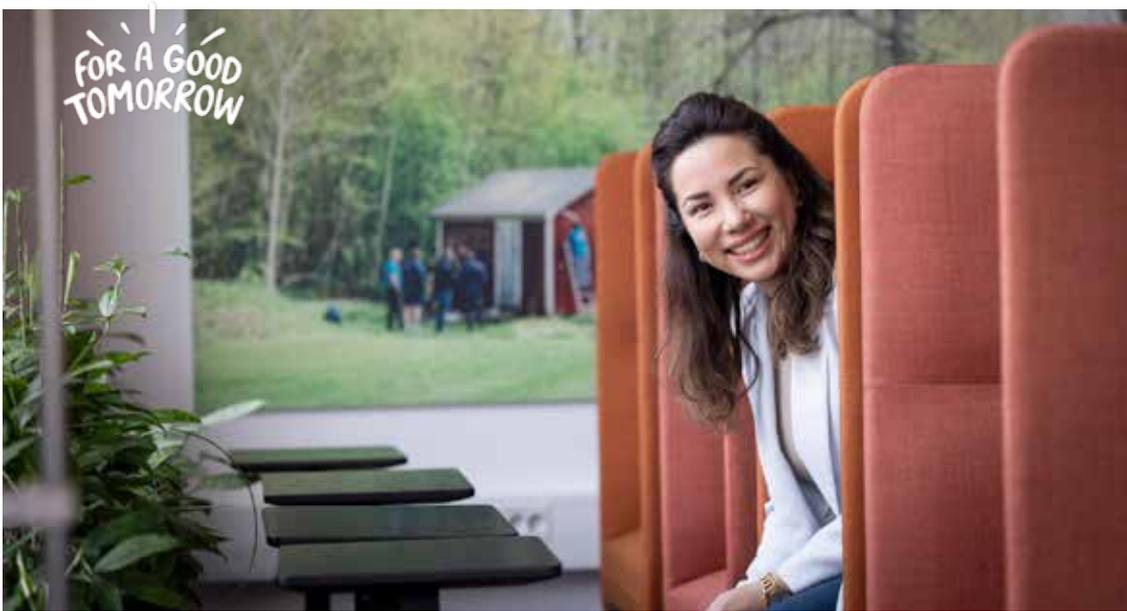
We do not share or act on inside information

We do not buy or sell ICA bonds or any other financial instrument if we have access to nonpublic information that is likely to significantly affect the price of the financial instrument. In addition, we may not induce anyone else, by giving advice or in some other manner, to undertake such trading. Within ICA, we only share inside information on a strict need-to-know basis.



Our commitment to society

Our social and environmental engagement



15. We uphold our commitment to environmental and social sustainability

We strive to conduct our business in an environmentally and socially sustainable manner, through efficient use of resources and with a reduced impact on the climate and environment, with the aim of being able to provide a sustainable customer offering. We do not tolerate child labor, forced labor, discrimination, harassment, or abuse, and we are committed to decent working hours and compensation, freedom of association and collective bargaining.

16. We are correct and transparent in our external communication

Our communication shall be efficient, relevant, clear, fact-based and transparent and must not be misleading. We shall treat all stakeholders equally. Our communication shall be in accordance with law and the Nasdaq Main Market Rulebook for Issuers of Fixed Income Instruments.

17. We respect international trade restrictions and anti-money laundering laws

We follow applicable trade restrictions and engage with our business partners in line with standard processes. We follow our due diligence processes on third parties and business partners when required, as we may be prohibited from dealing with parties that are subject to sanctions.

Implementation and Compliance

IMT members are, in their role as such and normally also CEOs of our ICA companies, responsible for that they:

- have provided for that all pertinent persons within their respective company or functional unit are informed of the content of this steering document; and
- have established necessary resources and processes to ensure that the principles and requirements of this steering document will be followed within their respective company or functional unit.

Managers are responsible for implementing this policy in their target group. Enforcement and follow-up of acting in compliance is part of every manager's responsibility. All ICA Personnel are responsible for familiarizing themselves with the contents of this steering document and for acting in accordance therewith.

Guidance and Reporting

If you have any questions regarding this CoC, please consult with your immediate manager or Group Legal.

ICA Personnel are encouraged to voice concerns with their immediate manager and to highlight examples of good practice. ICA Personnel can also report via ICA's whistleblowing process and can then choose to remain anonymous. Information on the whistleblowing process and access to the whistleblowing service is provided on the Group/local intranet.

There shall be no retaliation or other negative consequences for ICA Personnels reporting in good faith. The information received will be managed according to applicable data privacy laws and regulations.

Updates and Reviews

This policy shall be reviewed and updated annually or as needed based on the recommendations of Group CEO, CCCO, CHRO, CCRO and Group General Counsel.

