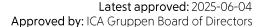


People Policy





1 Introduction

At ICA Gruppen ("ICA") including our subsidiaries ("OpCo"), we work to make every day a little easier for our customers. Achieving this goal requires talented and dedicated employees with a broad spectrum of experience, knowledge, and backgrounds. Our success depends on our ability to attract, develop, and retain talented individiduals and to create a workplace where we grow together.

The purpose of this policy is to outline the framework within which our employees, operate, ensuring alignment with our overarching goals and values This policy aims to create a work environment that supports our employees in delivering great service to our customers while maintaining a sustainable and healthy work-life balance. It serves as a guide for behaviour, expectations, and responsibilities, promoting a cultur of respect, diversity, and inclusion. We strive to make ICA a place where everyone can thrive, contribute, and grow together.

This policy is guided by international and local laws and regulations. Also, this policy is aligned with UN Guiding Principles on Business and Human Rights, the ILO Core Convention and the Children's Rights and Business Principles and OECD Guidelines for Global Companies.

This policy applies to all ICA employees, including all operating companies (OpCos). Employees in this context include managers, coworkers and consultants,

2 ICA's People Commitment and Expectations of Employees

This section outlines ICA's expectations of the employees, as well as what expectations our employees should have of each other and on ICA as their employer.

Managers shall ensure that the people on their team are given the necessary training to understand and commit to this policy, as well as any guidelines and instructions related to it.

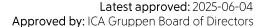
2.1 Values

At ICA we are convinced that a common approach and a shared view of basic values increases clarity for the customer about who we are and makes ICA more attractive to current and future employees.

Our values are simplicity, entrepreneurship, and commitment, and they make it easier for all employees to act in daily business and take the right decisions, and therefore improve internal efficiency.

2.2 Leadership, learning and performance

At ICA we believe that every employee has talent and all of us are leaders. To secure high engagement, high performance, growth, and employee resilience, ICA actively works with direction, learning- and performance goals, employee- dialogue and surveys as well as talent & succession management. ICA also gives our employees guidance in self leadership, team development and enables learning in daily work to empower employees to develop and realize their potential.





2.3 Total reward

ICA takes responsibility for having a market-based and differentiated reward system that drives performance. Compensation should be based on integrity and fairness where all employment related decisions regarding compensation are based on the employees' qualifications, the range and complexity of the responsibilities, individual performance and behavior or other legitimate business considerations.

2.4 Recruitment and Employer Branding

To guarantee ICA's future competence supply we work with Employer Branding and recruitment internal as well as external. Recruitment shall focus on competence, abilities, and potential to learn and grow.

We encourage and support internal mobility withinICA. Employees are encouraged to express their interest in new positions and managers are encouraged to consider internal candidates.

2.5 Diversity and inclusion

To ICA, diversity and inclusion is a question about equal treatment, equal possibilities, and a condition for successful business. Diversity in all different dimensions creates a dynamic, inclusive, and creative teamwork where personal differences are an advantage. This foundation strengthens our business competitiveness with better possibilities to understand all our customers' needs and expectations.

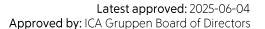
No one at ICA should be subject to discrimination or favoritism because of age, sex, ethnic background, nationality, religion, sexual orientation, disability, political beliefs, or social status. Neither do we accept physical, psychological, verbal, or sexual harassment.

Diversity and inclusion among our employees are highly valued at ICA. It has long been a conscious strategy that we prioritize, and we work consciously to ensure that our workplaces are accessible to all.

2.6 Work Environment

The health and safety of our employees is a high priority in all activities at ICA. No employee should have to suffer from physical or psychological injuries at their workplace. All managers are responsible for their team's working environment, but everyone has their responsibility to work together and to strive for continuous improvement and to prevent all kinds of injuries. ICA continuously works on ways to improve and find ways to create a workplace that enables our employees to do a good job and have a sustainable work-life balance. The overall purpose is to create safe, sustainable work environments with a high level of awareness so that all ICA employees have the best conditions to live and deliver to their full potential.

ICA's employees working in an office environment, have the opportunity to work in a flexible workplace setting, provided that this is compatible with the work assignment. However, the main workplace is the office.





2.7 Local Law and Agreements

All companies and employees within ICA shall comply with laws and agreements that applies to their operations and employment in the countries where they work. It also means that all employees must know and follow the laws that govern their individual tasks.

3 Implementationand Compliance

Each member of the ICA Gruppen Management Team ("IMT"), in their role as such and normally also OpCo CEOs, is responsible for ensuring, within their area of responsibility, that work within ICA Gruppen is conducted in accordance with this steering document. Each CEO is responsible for the implementation and compliance with this policy within their respective OpCo.

Managers are responsible for communicating this steering document in their target group. Enforcement and follow-up of acting in compliance is part of every manager's responsibility.

All ICA employees are responsible for familiarizing themselves with the contents of this steering document and for acting in accordance therewith.

ICA Employees who violate this policy may be subject to disciplinary actions up to termination of employment depending on the facts and circumstances.

4 Guidance and Reporting

If you have any questions regarding this steering document, please consult with your HR-manager or CHRO.

Any deviations from this steering document shall be reported to CHRO.

5 Updates and Reviews

This document shall be reviewed and updated annually or as needed based on the recommendations of CHRO, in consultation with OpCo HR-managers.