



POLICY

Sustainability Policy



1 Introduction

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

ICA Gruppen AB, including its subsidiaries, (the "Group" or "ICA Gruppen") believe that sustainability work and strong community engagement goes hand in hand with long-term profitability. Sustainability is a strategic priority and is integrated into all of ICA Gruppen's operations. ICA Gruppen's operations extend across many areas: Grocery retail, Pharmacy business, Construction and Real Estate operations, as well as Banking and Insurance services. The breadth of the business means the Group has an impact in a great many areas. ICA Gruppen aim to develop our business with the customers and long-term sustainability in focus. Customers and other stakeholders must feel secure and have confidence in ICA Gruppen and its business.

ICA Gruppen shall conduct our business in compliance with all applicable laws and regulations. ICA Gruppen has signed the UN Global Compact and has committed to its Ten Principles covering human rights, labour conditions, the environment and anti-corruption. Together with the UN's Sustainable Development Goals and ICA Gruppen's policies and guidelines, this forms the framework for ICA Gruppen's sustainability work.

ICA Gruppen's firm conviction is that all business must take place under fair and decent conditions. ICA Gruppen's sustainability work must be credible and transparent, and based on the company's actual and potential impacts on people, the environment, and communities. The work is based on the UN Declaration of Human Rights, the UN Convention on the Rights of the Child, the core conventions of the International Labor Organization (ILO), the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

ICA Gruppen's suppliers and other business partners must comply with the legislation in force throughout their operations in the countries where they operate.

The Sustainability Policy and the Sustainability Guideline describe ICA Gruppen's overarching position on sustainability matters beyond the requirements set out by law. This applies to all employees, consultants and board members ("ICA Personnel") and subsidiaries within the Group ("OpCo").

Likewise, we expect our suppliers and other partners to follow these whenever applicable and act in an ethically responsible way.

The areas of tax, business ethics, working environment, diversity and inclusion are areas linked to sustainability and are subject to separate policies and guidelines.

2 Sustainability Policy

Sustainability efforts form a natural and integral part of ICA Gruppen's operations and strategies. They help enhance the Group's long-term competitiveness and the aim is to create long-term value for both ICA Gruppen and the company's stakeholders. By virtue of its size, ICA Gruppen has a great

responsibility – but also the capacity and opportunity – to contribute and influence developments in a positive direction. ICA Gruppen's sustainability work is wide-ranging and spans many different areas – the environment, health, inclusion and diversity, social responsibility, and quality.

- ICA Gruppen's products and services sold or otherwise made available by ICA Gruppen shall comply with applicable legislation. They shall also live up to the expectations of our customers and other stakeholders in the markets where we operate, in terms of function, safety, social compliance, health and impact on the environment.
- ICA Gruppen shall be, and be perceived as, responsible, and progressive in matters of sustainability.
- ICA Gruppen shall maintain a high standard of quality while constantly reducing the environmental impact.
- ICA Gruppen shall work by a due diligence process to ensure that negative impacts on human rights, climate and the environment in the value chain are identified and handled proactively.
- For products regulated by specific legal due diligence requirements, such as batteries and products with high risk for deforestation, ICA Gruppen shall comply with any such requirements. Specific steering documents as required by law are adopted by the CR Group Management and shall be publicly available.
- ICA Gruppen shall meet society's expectations on openness and honesty. ICA Gruppen shall listen to rights' holders, customers and other stakeholders, using their opinions to help promote sustainable business growth.
- ICA Gruppen continuously improves and seeks out new knowledge and technologies and implements them, step by step, in the operations. In this way, our common resources are used to the benefit of society, ICA Gruppen and our stakeholders.
- ICA Gruppen's objective is to provide factual, reliable, and relevant information and communication that enables customers to make their own sustainable choices.

3 Implementation and Compliance

ICA Gruppen Board of Directors' tasks include deciding on policies for sustainability, establishing the structure for the company's sustainability reporting (annually and quarterly), and monitoring the ICA Gruppen's work on sustainability.

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.

Managers are responsible for communicating and implementing this policy in their target groups. 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 policy and for acting in accordance therewith.

4 Guidance and Reporting

If you have any questions regarding this steering document, please consult with your immediate manager or with your OpCo CR Manager.

Any deviations from this steering document shall be reported to CR Group Management.

CR Group Management will monitor ICA Gruppen's compliance with the Sustainability Policy and will report this to IMT and ICA Gruppen Board of Directors.

5 Updates and Reviews

This document shall be reviewed and updated annually or as needed based on the recommendations of Chief Corporate Responsibility Officer.