

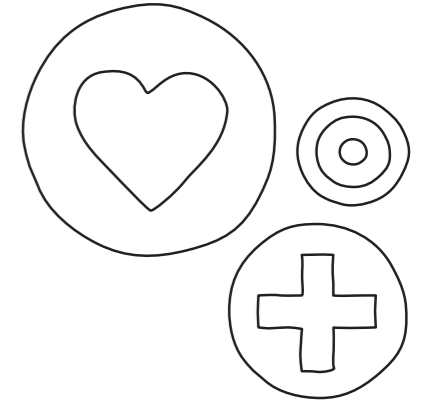


CODE OF  
*Conduct*

Attendo  
♥◎+

# OVERVIEW OF CONTENT

<b>Purpose of our Code of Conduct</b> .....	<b>4</b>
Attendo's role as a large private care operator in the Nordics.....	4
Our business is heavily regulated.....	4
Who must comply with the Code? .....	4
What is your responsibility? .....	4
How and to whom can you raise a concern? .....	5
What happens when you raise a concern? .....	5
Violations of the Code of Conduct.....	6
<b>Attendo's Code of Conduct – 10 principles for how we work</b> .....	<b>7</b>
<b>Care for customers and their close ones</b> .....	<b>8</b>
We always put the customer at the center .....	8
We meet customers' close ones with empathy and support.....	9
We have a comprehensive and common quality framework.....	9
<b>Care for our people</b> .....	<b>10</b>
We promote and honor human rights.....	10
We apply fair wages and working hours.....	10
We respect the freedom of association and right to collective bargaining .....	10
We embrace diversity and do not accept any form of discrimination .....	10
We have zero tolerance for harassments.....	10
We ensure a safe and healthy working environment .....	11
We work as a team to create a culture based on our values, openness and trust.....	11
We are a learning organization.....	11
We have clear principles for employment decisions.....	11
<b>Care for our society</b> .....	<b>12</b>
We uphold laws and regulations.....	12
We are a reliable partner to our contracting municipalities.....	14
We do not engage in any form of corrupt practices.....	14
We compete fairly .....	14
We contribute to sustainable social development.....	14
We take conscious actions to limit our environmental impact .....	14
We are responsible and transparent with our public policy activities.....	15
<b>Care for our company</b> .....	<b>16</b>
We believe in decentralised responsibility.....	16
We work actively to avoid conflicts of interests.....	17
We handle information with care .....	17
We respect and protect privacy and information security in our operations.....	17
We protect company property and assets.....	17
We ensure reliability and transparency in our reporting .....	18



## To all Attendo colleagues,

Attendo is a pioneer in Nordic care. We started our journey more than 35 years ago, based on the belief that private care providers have an important role in raising the quality in care and could simultaneously provide tax-payers more value for money spent. Over the years, we have contributed to the development of care with many innovations and our commitment to put the customer at the center of everything we do.

Our mission is to empower the individual, which means to see, support and strengthen every person in our care to an independent and meaningful life. We do this based on our values - care, commitment and competence – in a way that is characterized by openness and continuous learning. Our mission and values are both long-term goals and daily tools to realize our high ambitions. By anchoring our daily work in our mission and our values, we will succeed with our strategic goal – to be the most attractive choice in Nordic care.

The key to Attendo's success is our employees. Each and every one of us has a role in fulfilling our important mission and creating a company where we are proud to work. This means that every employee at Attendo must know and understand our mission and act in accordance with our common ways of working, our values and culture. Attendo's Code of Conduct is based on our core values and our promises to customers and relatives, to our colleagues and to the society. It provides a common foundation for how we act in our work. The code is meant to guide us and support our decisions and actions, especially when they are difficult or uncertain. The code is also an expression of Attendo's commitment to openness and for how we together create a culture based on shared responsibility, trust and team spirit.

To live as we learn is everyone's responsibility, starting from the top. The code has been adopted by Attendo's board of directors. Each of us has a shared, as well as a personal, responsibility to follow the code and let its spirit infuse our work in every effort, every day.



MARTIN TIVÉUS  
President and CEO

# PURPOSE OF OUR CODE OF CONDUCT



Attendo's mission is to *Empower the individual*, which means to see, support and strengthen every person in our care. In our operations, we live by our core values *Care, Commitment and Competence*. Our values guide us in fulfilling the promises we make to our customers and their close ones, our employees and the municipalities who engage us. This Code of Conduct (our "Code") represents our commitment to act with integrity in relation to all of these stakeholders. It translates Attendo's values and promises into guiding and actionable principles. It also explains what you, as an Attendo employee, can expect from us as a company, and how we expect you to act.

## Attendo's role as a large private care operator in the Nordics

For over 35 years, Attendo has been a pioneer in Nordic care. We were the first company to win contracts from local authorities to run outsourced home care and care homes in Sweden. Today, we are present in more than 200 communities with contracts from more than 300 local authorities in Sweden, Finland and Denmark.

Our operations are directed to sectors that mainly have public financing. As one of the industry's leading providers, we place great value on not only living up to the expectations that customers and close ones, employees and municipalities have on our business, but also in earning the public's trust.

There is a significant interest in politics and media for care in general and for privately run care in particular. We will cater for that interest with a professional, fact-based and supportive attitude.

Attendo shall act committed and initiated in matters concerning the care industry. Political proposals concerning our industry or our activities must be met with objective arguments.

We will also contribute facts and insight into how our industry works, explain the conditions for our activities and how we succeed in our mission.

## Our business is heavily regulated

Attendo operates under a large and complex set of laws and regulations, applicable to our care operations and to us as a public company listed on Nasdaq Stockholm. We shall conduct all of our business in accordance with applicable regulations, this Code of Conduct and Attendo policies and directives. The Code of Conduct is an overall document to which our group policies and internal rules are linked.

Attendo's organization is decentralized, and organized in two business areas, Scandinavia and Finland, each with their own regional and local governance structure. Should differences exist between the Code of Conduct and any local requirements, the more stringent standard of conduct shall be applied.

## Who must comply with the Code?

The Code of Conduct applies to all employees within the Attendo Group, regardless of location or role. Persons who are not legally employed by Attendo but effectively act as if they were (those who represent Attendo through consultancy agreements or similar) must also follow the Code.

We expect our business partners and suppliers to conduct their business in line with the spirit and main principles outlined in the Code.

## How and to whom can you raise a concern?

At Attendo, we encourage openness, transparency and communication – also when it comes to difficult situations. If you become aware of a behavior or a situation which is not in line with laws or regulations, the Code, Attendo policies or our values, you should raise your concern to:

- › Your closest manager
- › Your manager's immediate manager (such as your area manager or regional director)
- › Your local HR contact or the business area's HR department
- › Relevant service function, such as Quality or Legal & Compliance

In a situation where you believe you have identified a potential serious misconduct, you may contact the Group General Counsel directly. As set out below, you may also be required to report care related incidents or risks according to special routines.

## What happens when you raise a concern?

### Managers must act

Managers at Attendo must assess all reported concerns regarding breach of laws or regulations, the code, Attendo policies or our values seriously and respectfully, and protect the rights and the reputation of the persons involved in the matter. This includes the individual who reports any perceived misconduct, as well as any individual alleged to be in breach.

Any manager who receives a report regarding potential viola-

## What is your responsibility?

### ATTENDO EMPLOYEES

As an Attendo employee, you should:

- ✔ Read and ensure that you understand the key principles on page 7 and how they apply to you
- ✔ Use the points under "What this means for you" in each section of the Code for further guidance
- ✔ Ensure that the actions you take comply with both the words and the spirit of the Code
- ✔ Raise concerns with regard to adherence to laws and regulations, the Code, our policies or our values. It is your right, and responsibility, to do so.

### ATTENDO MANAGERS

Managers at Attendo are also responsible for leading in accordance with the Code, as well as ensuring that employees understand and adhere to the standards of conduct outlined in the Code.

As an Attendo Manager, you should:

- ✔ Be a role model and set a good example by your own conduct, actions and decisions
- ✔ Safeguard a work environment that encourages employees to live by our values and openly communicate around issues that could compromise these values or our business principles
- ✔ Listen to employees' concerns and questions about our values and what they mean, about business conduct issues and ethical dilemmas and ensure that appropriate actions are taken. If you need support, seek further assistance from relevant service functions.

tion of laws and regulations, the Code, our policies or our values should:

- › Listen and meet the reporting employee with empathy and understanding
- › Take appropriate actions to address the situation
- › If possible, explain to the employee what can and will be done
- › When needed, request support from a superior or relevant service function
- › Work and communicate broadly around reported concerns, when possible

No adverse work-related consequences may be imposed on any employee who alerts management of perceived violations of laws or regulations, the Code, Attendo policies or our values.

#### Your responsibility

When you raise a concern, ensure that the information you provide is as factual, objective and specific as possible. Be respectful of your colleagues and managers, even if you are in disagreement.

We expect you to act with honesty, integrity and in the best interest of our company. Possible violations of rules or our values are serious matters. Should such allegations be made without cause, disciplinary actions may be taken.

#### Violations of the Code of Conduct

Employees who violate laws and regulations, the Code, our policies or our values may be subject to disciplinary action. Depending on the facts and circumstances, this could include dismissal. In many cases, the rules in the Code of Conduct and related policies and directives are based upon requirements of laws and regulations, meaning that any failure to follow them could result in both disciplinary actions and legal sanctions being taken against the employee (as well as against Attendo as a company).



#### THE WHISTLEBLOWING CHANNEL

Attendo has established a whistleblowing channel, which is available to all employees in Attendo. The whistleblowing channel, which can be used anonymously if you so wish, may be used if you become aware of something that might breach laws and regulations, the Code, our policies or our values, and you deem that it is not possible to handle the issue openly within other communication channels. The whistleblowing channel is available via our employee app and Intranet, where you will find further information on how and when to use this service.

#### YOU ARE LEGALLY OBLIGED TO REPORT CARE RELATED MALPRACTICE AND MEDICAL INJURY

In both Attendo Scandinavia and Finland, there are legal requirements to report care related malpractice or medical injury (or the risk of such malpractice or medical injury) to authorities. These obligations are often referred to as Lex Sarah (malpractice) and Lex Maria (medical injury, which only applies in Sweden). These are very important regulations, that you must be aware of and understand. Detailed information about the reporting obligations and how to report is provided in separate guidelines and instructions.

It is important that you understand that generally raising a concern to your manager or a service function, or using the whistleblowing channel, does not replace these legal obligations. Make sure that you understand how to act if you face a serious situation, and never hesitate to ask for guidance and help.

## ATTENDO'S CODE OF CONDUCT – 10 PRINCIPLES FOR HOW WE WORK

The Code of Conduct expresses our ways of working, values and culture. This is a comprehensive document. Use the full Code for reference when you need guidance. In your daily work, you should be guided by the below principles – these principles reflect the approach that should be the basis for everything we do at Attendo. As an Attendo employee, you have a personal responsibility to uphold our values and act in line with the Code and these principles in every action, every day.

**1. We always put the customer at the center.** Meet every customer in light of their personal situation. Ask yourself "What can I do to make this person feel safe, involved and independent?" Also, keep in mind that customers often are in a vulnerable life situation. Always act with warmth and respect.

**2. We meet persons close to our customers with empathy and support.** Persons close to our customers may worry and need our support. Meet any person with ties to a customer with an understanding and compassionate approach. Give close ones the right information, at the right time, to ensure that they feel secure with your work and Attendo as well as our common ways of working.

**3. We are all responsible for ensuring high quality care.** We are proud of Attendo's operations and our comprehensive work with quality. We expect you to both uphold and take part in developing our ways of working. If you are faced with a situation where something is not right, always take action.

**4. We have an open, respectful and direct dialogue with each other.** As part of Attendo, you have both a responsibility and a right to raise ideas, questions and suggestions for improvement. Speak to your colleagues and your manager about work and the working environment. Listen to feedback from others and always treat your colleagues with respect.

**5. We run our operations in collaboration with the municipalities.** We carry out a vital service for the municipalities that we work with, at specific terms and based on public funding. Do your best at work and be a reliable partner – by doing so, you contribute to the trust and confidence for Attendo from both the municipality and the community.

**6. We uphold laws, regulations and ethical principles.** Laws, regulations, ethical principles and Attendo's standards should always be followed. If you ever have questions about what applies to you or how you should act, don't hesitate to ask a colleague or a manager for help.

**7. We embrace diversity and do not accept any form of discrimination.** You may never discriminate against anyone based on personal characteristics or beliefs such as gender, age, religion, ethnic and national origin, political affiliation, sexual orientation, or similar.

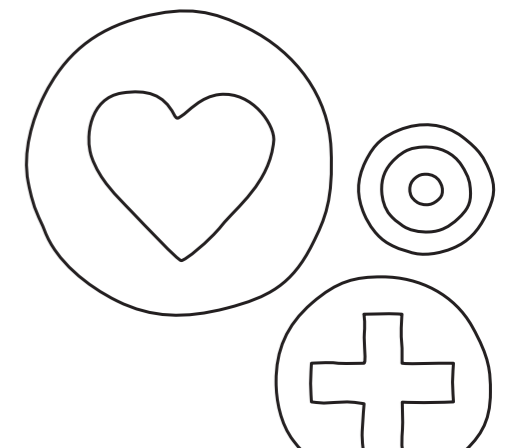
**8. We act with integrity in our work.** Abuse or misuse of your position as an Attendo employee for the personal gain of yourself or someone you know is not tolerated. You may never accept or give a personal gift or favors that can be perceived as affecting your decisions or work - even if you think that it doesn't. Make sure that you are always able to explain and justify your decisions.

**9. We are a learning organization.** You will be offered local, central and digital trainings. Participate in them - regardless if they are mandatory or optional. Be open to new knowledge from your colleagues and the outside world, spread your ideas and take an active part in developing both your skills and our company.

**10. We protect our company's reputation and its assets.** Handle all equipment and assets of the company responsibly. Ensure that they are never used for any illegal activity or in a way that could harm Attendo's reputation.

**You are important and what you do is important – to customers and their close ones, to your colleagues, to the municipalities we collaborate with, to Attendo as a company and to society as a whole.**

**Be proud of your work and Attendo. Be an ambassador for Attendo's mission and values at all times.**



# CARE FOR CUSTOMERS AND THEIR CLOSE ONES



Care is profoundly important to customers and their close ones. We are committed to providing compassionate care, that enables customers to be seen as individuals and their close ones to feel safe. Common methods and ways of working ensures that we provide a high and stable quality of care, to improve both health outcomes and customer experience.

### We always put the customer at the center

Attendo's customers are at the centre of everything we do. We recognize that every person in our care needs to feel safe, have stability in their everyday life and be seen and heard as a person by employees who care. Employees must always treat customers with warmth and respect and based on the customer's individual needs and wishes. Our common systems and routines aim to ensure stability and predictability in all care instances. We believe that meaningful social exchange is essential for the well-being of customers and provide a variety of opportunities for social interaction.

### We meet customers' close ones with empathy and support

Caring for Attendo's customers also includes meeting the people who have personal ties to customers with empathy and a supportive mindset. We acknowledge that asking us to care for a loved one often is a significant step, which raises many questions and might cause worry. We strive to keep customer's close ones well-informed of our ways of working and what to expect from us. We build trustful relationships with both customers and their



### OUR PROMISE TO CUSTOMERS

*"We encounter you as the individual you are, listen to you and value your wishes. We see, support and empower you to be able to feel at home and live an independent life."*

close ones based on clear on-boarding processes, appointed contact persons and continuous and timely communication, in accordance with the customer's wishes.

### We have a comprehensive and common quality framework

Attendo works systematically to enhance the quality of our care and quality of life for customers. We have a comprehensive quality framework, which aims to spread the best available knowledge and methods across the organisation and ensure consistency in our operations. We are guided by research and follow developments of technology and digital tools to improve the well-being and health of customers. Quality and customer satisfaction are monitored in every local unit through regular audits as well as customer, payor and employee surveys, in order to learn lessons from initiatives and ensure continuous improvements.

### What this means for you as an employee

- ✔ Say hi, and say good bye. Knowing when you come and when you end your shift provides comfort for the customers in your care.
- ✔ Use a calm and clear tone of voice when you meet customers. Present what you are there to do.
- ✔ Take time to listen to and communicate with customers and close ones. Use the relative app when you can. If you make a promise, follow up on that promise.
- ✔ Make sure that you understand routines and quality practices. Share learnings with your colleagues.
- ✔ Contact your closest manager or the Quality Department if you need guidance.



### OUR PROMISE TO CLOSE ONES

*"We provide care with warmth and compassion. We give the best possible support so you can be confident that your loved one is in good hands."*



# CARE FOR OUR PEOPLE

Our employees are the key to Attendo's quality, culture and development. We strive to be an attractive employer, committed to offering an inclusive and stimulating workplace to everyone who wants to grow, contribute to the development of care and make a real difference in the everyday life of many humans.

## We promote and honor human rights

Attendo promotes and honours fundamental human rights in our operations. The rights of our employees are respected and we work to ensure high employment and labor standards. Attendo does not tolerate the use of any illegal, abusive or forced labour in our own operations or in the operations of any business partner. In case of employing young workers (under the age of 18), Attendo complies with all relevant regulations.

## We apply fair wages and working hours

Attendo is a reliable employer, with a responsible approach to wages and working hours. We set employment terms in accordance with applicable national law, industry standards and collective agreements, if applicable, wherever we operate. Employment contracts shall be adhered to by both Attendo and the employee.

## We respect the freedom of association and right to collective bargaining

Attendo supports the right of every employee to choose to be represented by unions (or choose not to), to organize and to bargain collectively or individually. We want to have constructive relationships with our employees and, when applicable, their union representatives. We are working to ensure an open and collaborative working environment, in cooperation with the unions. Cooperation and constructive dialogue is a natural part of providing Attendo's employees participation, meaning and commitment.

## We embrace diversity and do not accept any form of discrimination

Attendo works actively with equality issues. Our business accommodates a diversity of individuals and cultures, which reflects society at large. We do not accept discrimination against anyone based on personal characteristics or beliefs such as gender, age, religion, social background, disability, pregnancy, ethnic and national origin, membership in unions, political affiliation, sexual orientation, or similar. Attendo's employees may never discriminate against customers or persons close to them, colleagues or any other stakeholder based on any of the above characteristics.



OUR PROMISE TO EMPLOYEES

*"We offer you a meaningful job that lets you have an influence, develop and make a difference."*

## We have zero tolerance for harassments

Attendo is a company built on clear values. Harassments or other inappropriate behaviour has no place in our working environment. All Attendo employees should be treated and should treat others with respect and dignity. Physical or verbal harassment or any illegal threats, including derogatory comments based on racial or ethnic characteristics, physical or mental disabilities or unwelcome sexual advances or sexually explicit remarks, are not tolerated.

## We ensure a safe and healthy working environment

Attendo works actively to ensure that our workplaces are safe and healthy working environments. We work systematically to reduce risks and promote employee health and safety and to ensure continuous improvement. Managers and employees are given appropriate training to assess risks and uphold safety and security routines at their workplaces. Working with our values is also an integral part in our systematic work to develop the best working environment.

## We work as a team to create a culture based on our values, openness and trust

Every Attendo employee has a personal responsibility to uphold our values, the principles in this Code and our ways of working. In doing so, we create the Attendo spirit together with every action, every day. Employees have both a responsibility and a right to raise ideas, issues and suggestions for improvement. We encourage openness, transparency and communication, also when it comes to difficult situations. Each employee should know of the different channels and means for how to raise ideas or concerns, to ensure that appropriate actions are taken and implemented throughout Attendo.

## We are a learning organization

Attendo is continuously providing opportunities for employees to develop. We offer thorough introduction, supervision and mentor programmes to new employees. Introductions and educations are made available to employees before their first day at an Attendo unit. Once on-board, employees can participate in local, central and digital trainings. Every employee has a responsibility to participate in trainings and be receptive to new knowledge and better ways of working. Our ambition is to continuously build on Attendo's collective expertise and best practice and make it available to all employees. We work in teams to learn from each other and pass on skills developed through experience. We encourage employees to spread their ideas and take an active part in developing new methods. Employees who advance our ways of working are acknowledged and awarded.

## We have clear principles for employment decisions

Employment related decisions at Attendo, including recruitment, promotions and work assignments, as well as compensation and termination of employment, should be based on facts and clear principles. Such decisions should be based on competence, experience and performance. Employment related decisions also have to be approved by both the decision-making manager and his or her immediate manager (the "grandparent principle").

## What this means for you as an employee

- ✔ You should have access to information about your conditions.
- ✔ You are free to join any employee organization, or choose not to.
- ✔ Participate in all training that is available to you. Join innovation and best practice groups.
- ✔ Speak to your colleagues and managers about your work and working environment. Always treat others with respect, even if you are in disagreement.
- ✔ Read the introduction chapter of this Code, as well as your local guidelines, to understand how to raise ideas, issues or suggestions for improvement.
- ✔ Contact your closest manager or the HR department if you need guidance.

# CARE FOR OUR SOCIETY



Being a reliable, efficient and solution-oriented partner for the public sector that engages us is a fundamental part of our success. So is fair play. We carry out our business activities with openness, a long-term sustainable approach and respect for applicable laws and regulations.

### **We uphold laws and regulations**

Attendo as a company, as well as our employees, are subject to comprehensive legal and regulatory duties, stemming from laws and regulations, permits and agreements. We always seek to fully comply with the rules and other principles that govern our business, even if we may be working to change some of them for the better. All managers must understand and comply with the requirements in the permits and agreements that apply to their operations. Every employee should be informed of the means, and obligations, with respect to documentation and reporting of potential deviations from rules, requirements or internal guidelines. We realize that difficult situations will arise and that no organization can avoid deviations. Accordingly, every employee has an obligation to act if something is not right.



### OUR PROMISE TO PAYORS

*"We are a trusted and solutions-oriented partner that provides safe and cost-effective care."*



**We are a reliable partner to our contracting municipalities**

Attendo is contracted by municipalities to provide care, a vital service for the society. The framework for our operations is set by agreements with municipalities and customer choice systems of various kinds. For us, this means that we run our business in collaboration with the public. It is our role to ensure that customer needs are satisfied, by providing high quality care based on solid processes and routines. Relying on the strength of our values, experience, shared knowledge of the best working methods and a structured approach to quality development, Attendo is able to ensure high customer satisfaction, stable quality and more care for tax money spent. As partner to municipalities, we are reliable, transparent and solution-oriented.

**We do not engage in any form of corrupt practices**

Attendo does not accept any corrupt practices. Corrupt practices are such that involve abuse or misuse of entrusted power for personal gain. This extends to all of our business dealings and transactions, and anyone representing Attendo (including third parties).

**We compete fairly**

Attendo competes on the merits of our offering and brand, in a fair manner and in accordance with applicable tendering and competition rules. We drive the development of the care sector by participating in well-established forums, such as employer unions and industry organizations, as well as engaging in the public discussion regarding care.

**We contribute to sustainable social development**

Access to care for people with care needs is a natural part of a sustainable society. Attendo is a significant provider of care services in the Nordic countries and adds new capacity, new methods and innovations in care to society. By giving more people access to good quality care, we contribute to sustainable social development and to the fulfilment of several of the United Nations' Sustainable Development goals. We also devote significant resources towards training and development of our employees. When each of our nearly 25,000 employees understand their important role as team members, as leaders and in providing excellent service to our customers, we are also taking part in driving a more compassionate and customer-centric development of the care industry.

**We take conscious actions to limit our environmental impact**

Attendo is a service company with a limited environmental impact. Within the scope of our business, we work systematically to be resource-efficient and make choices that reduce our environmental and climate impact. As part of our ambition to contribute to an environmentally sustainable future, we have implemented systems and policies to lower our Co<sup>2</sup> emissions and ensure greener choices in the areas of purchasing, transport, energy and water consumption and waste management. Attendo coordinates all purchasing to achieve advantages and ensure environmental benefit.



**BRIBERY AND PERSONAL BENEFITS**

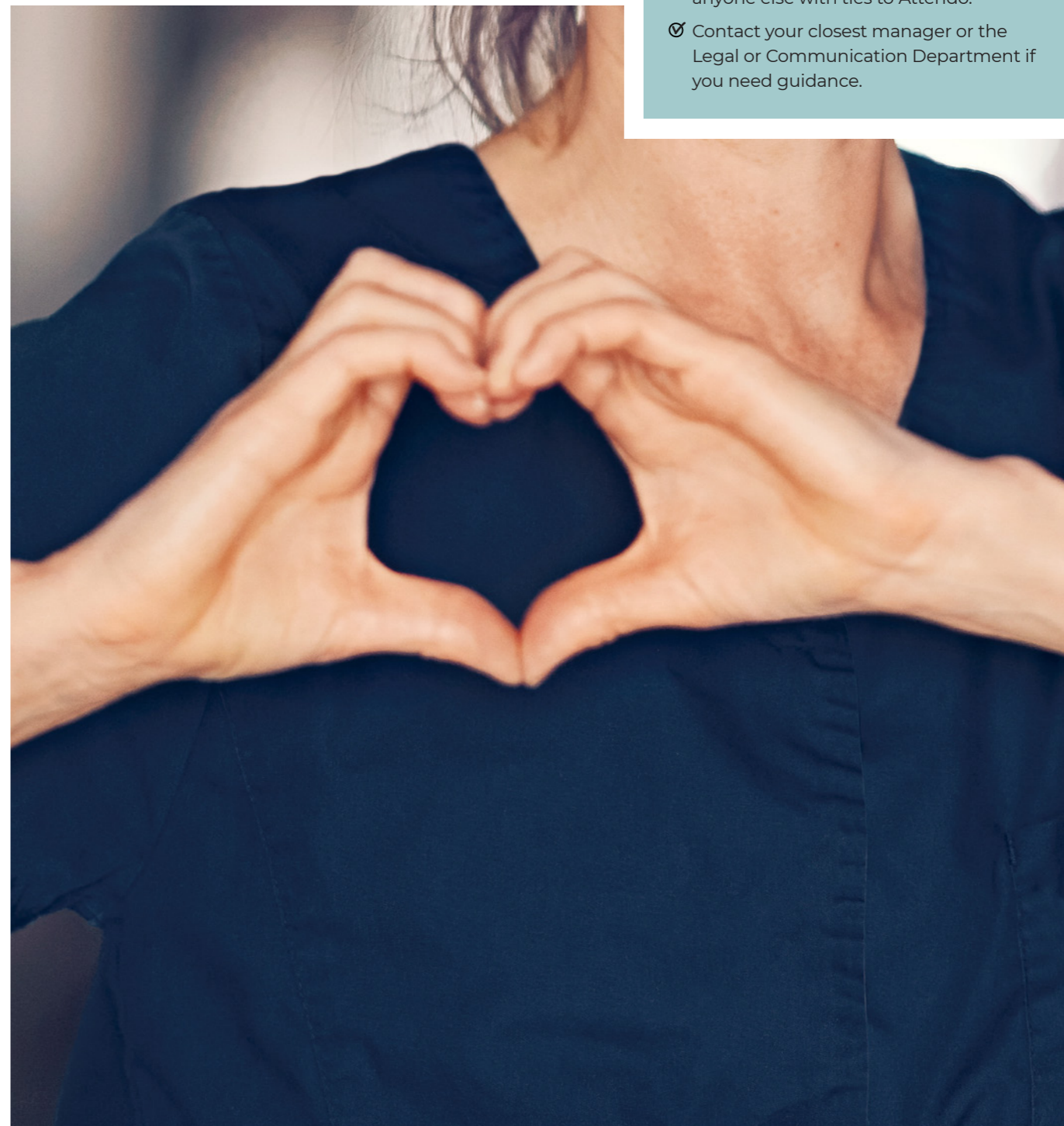
Bribery typically refers to offering/giving or demanding/receiving something of value to influence a transaction or decision. Bribes can take the form of payments, gifts, entertainment, favorable treatment or publicity. Attendo employees may not offer, nor accept from, outside parties (such as customers or potential customers, suppliers, consultants, governments or any representatives of such parties) any benefit or reward in violation of applicable laws or established business practices in order to obtain or retain business or to gain or give an improper advantage.

**BUSINESS GIFTS, REWARDS OR OTHER FORMS OF BENEFITS**

No personal gifts, rewards or benefits which might diminish an employee's objectivity, influence business transactions or decision-making, or lead to a relation of dependency, may be offered to or accepted from a customer or other third party. Any business gifts or hospitality should be granted as acts of goodwill, be of moderate value and in line with normally accepted business practices and should never influence decision making. Gifts to public officials are prohibited.

**We are responsible and transparent with our public policy activities**

Attendo seeks to have transparent and productive relationships with democratically elected policy makers, regulators and authorities, both as a company and as participant in industry groups. We respect their authority and views and regularly share information and opinions on issues that affect the care sector, our industry or our own operations. As part of this, we welcome representatives from public authorities or elected officials to visit our operations. All public policy and political activities undertaken on behalf of Attendo must be lawful, ethical and in accordance with Attendo's core values. Transparency and openness shall guide all our advocacy activities, and we only use official ways of contact for public policy activities.



*What this means for you as an employee*

- ✔ Make sure that you know routines and requirements for your work assignments and work place.
- ✔ Do not give or accept gifts or anything that could be considered a bribe.
- ✔ If needed, use the whistleblowing channel to report potential breaches of laws and regulations, permits and agreements.
- ✔ Ask your manager for support and guidance if you are offered a gift, favor or request from a customer or close one or anyone else with ties to Attendo.
- ✔ Contact your closest manager or the Legal or Communication Department if you need guidance.



# CARE FOR OUR COMPANY



Good corporate governance supports Attendo's mission, helps us to reach the strategic goals and strengthen the corporate culture. All Attendo employees are responsible for acting with integrity and protecting our company's business, reputation and assets.

## **We believe in decentralised responsibility**

Attendo is founded on a strong base of values and common tools, with decentralised responsibility to enable local excellence and ownership. We believe in empowerment of our employees, clear division of responsibilities and full accountability in every local operation.

Local managers bear personal responsibility for their operations, and are encouraged to involve their employees as much as possible in the development of the local business and our company. This enables us to uphold an entrepreneurial spirit and take decisions faster and in closer proximity to customers, as well as the municipalities whom we are partners to. Service functions, routines and procedures facilitate common ways of working throughout Attendo and ensures that our operations maintain a steadily high level.

Attendo also takes a structured approach to managing risks, based on a framework that covers external risks, operational risks, and financial risks. We implement policies, guidelines, instructions and controls to manage identified risks and apply governance and reporting structures that provide appropriate oversight.



OUR PROMISE TO THE COMPANY

*"We believe in empowerment of our employees, clear division of responsibilities and full accountability in every local operation."*

## **We work actively to avoid conflicts of interests**

Attendo's employees should always act with integrity in all of their dealings with customers and their close ones, municipalities and business partners. This means that we avoid situations where there may be a conflict of interest, to the extent possible. If a conflict of interest arises, employees must be open and transparent about it.

## **We handle information with care**

Attendo is an open and responsive company. We communicate with our stakeholders clearly and promptly, while being mindful of constraints relating to data protection regulations, professional secrecy, confidential business information, inside information, as well as respect for our colleagues and Attendo's business partners.

Company statements shall always be carried out by appointed spokespersons. However, our business is such that external information requests are both natural and common at various levels of the organization. Operative leaders have a natural role in media contacts relation to their areas of responsibility, supported by the communications team.

Employees who communicate with municipalities or media as part of their work should always be professional and polite, and educated in how to be transparent and accessible within the limits set by applicable rules. If employees make external comments that may be construed as being related to Attendo or its business, they shall exercise caution and clearly state that such statements and comments are personal and do not reflect the view or opinions of Attendo or its management.

## **We respect and protect privacy and information security in our operations**

Attendo's operations imply processing of many types of information and personal data. We take data protection and compliance, as well as information security, seriously and acknowledge the importance of data ethics. We apply policies, procedures and systems to meet regulatory obligations and facilitate individuals' enforcement of their rights concerning personal data.

## **We protect company property and assets**

Attendo's employees are entrusted with company property, equipment and other resources to manage their work assignments. These include IT systems, computers and phones, company information and funds, as well as real-estate and company cars. Each employee is responsible for ensuring that company property is not used for any illegal activity, is not misused and not used in a way which would harm Attendo's business or reputation. Employees must treat all company property with care and comply with guidelines set to protect our assets, including digital assets, and reducing risk for theft. Attendo assets, property, equipment, resources and funds may be used only for business purposes and not for personal gain.

## **"CONFLICT OF INTEREST"**

A "conflict of interest" is at hand when private or personal concerns may influence the judgement, objectivity or independence of an employee in decisions or work situations. Conflicts of interest can arise in many ways, but these are common examples:

- ☑ When a manager hires or supervises a family member or other relative
- ☑ When an employee has a personal interest, direct or indirect, in a supplier, customer or other business partner to Attendo
- ☑ When employees have an employment outside the work at Attendo, and the interests of one position contradict the other.

## **FREEDOM TO COMMUNICATE WITH MEDIA**

**Attendo employees in Sweden** have a legally protected right to provide views and information (except documents) to TV, newspapers or radio operating under the laws on freedom of speech, without the company investigating the source of information.

We encourage our employees to raise ideas, feedback and suggestions for improvement. There are several internal communication channels, in addition to spekaig directly with the local manager. We strive to uphold a culture and climate of transparency, dialogue and trust, so that employees feel they can raise concerns within Attendo. We are convinced that a direct, responsive and constructive dialogue provides the best conditions for participation and change, both in the short and long term.

## **INSIDE INFORMATION**

**Attendo is a public company**, with its shares are listed on Nasdaq Stockholm. As a listed company, Attendo complies with stock exchange regulations and requirements regarding disclosure of information which could have a significant effect on the price of Attendo's shares (inside information). Attendo applies policies and procedures to meet these obligations. Employees who are likely to come in contact with inside information are educated and regularly reminded of theirs, and the company's, obligations.

**We ensure reliability and transparency in our reporting**

Attendo's financial information is used by our investors, municipalities, suppliers and other stakeholders. Financial metrics are also used as one of several means to ensure that we take appropriate decisions, at the right time, in our operations. Attendo has clear processes, systems and controls in place to ensure that transactions are accurately and timely recorded and reported. We operate in a politically, financially and regulatory complex environment. Our reporting should be as transparent and informative as possible, contributing to the trust for Attendo, as well as private care operators overall. It is strictly prohibited to misstate or enter misleading information in our systems in order to influence targets, performance indicators or information to be reported to municipalities or authorities.

*What this means for you as an employee*

- ✔ If a conflict of interest (see above) arises, speak to your closest manager or HR directly.
- ✔ Make sure that you understand how to handle sensitive and confidential information, such as customer information, in your work.
- ✔ Do not to post confidential information on social media or discuss confidential or sensitive information in places where you may be overheard by others.
- ✔ Company property may not be used for any illegal activity or for viewing material that is inappropriate, including pornographic sites or any other sites which would harm Attendo's reputation.
- ✔ Contact your closest manager or the Legal or HR Department if you need guidance.



