

Code of Conduct – GRAM Group (Hotel Riviera Strand, Hotel Skansen, Torekov Hotell, PAVO and Huset Vid Stranden)

Purpose and Scope

This Code of Conduct outlines our approach as a business partner, employer, and societal actor.

Its purpose is to provide guidelines for responsible behavior in both internal and external relations and to clarify the fundamental expectations in business situations.

The Code applies to the entire GRAM Group and all its employees.

If an employee suspects any violation of the Code, they are encouraged to contact their immediate manager or report it through our external whistleblowing service. The Code of Conduct is available on the GRAM Group website.

Responsibility

The Code of Conduct is approved by the Board of Directors of our owner, Backahill. The CEO of GRAM Group is responsible for ensuring compliance and for delegating responsibilities within the framework of the Code.

All employees are individually responsible for understanding and acting in accordance with the Code of Conduct.

Code of Conduct Principles

Our Code of Conduct is based on internationally recognized guidelines and principles to ensure that our business is conducted in a sustainable, ethical, and responsible way.

We support the **Ten Principles of the UN Global Compact**, covering four key areas:

- **Human rights**
- **Labor**
- **Environment**
- **Anti-corruption**

These principles are grounded in the UN Declaration of Human Rights, the ILO core conventions, the Rio Declaration, and the UN Convention Against Corruption.

Business Ethics and Anti-Corruption

We conduct business with integrity, promote fair competition, and maintain high ethical standards.

We actively promote transparency and accountability throughout our value chain.

We strictly adhere to all applicable laws, regulations, and standards.

We have **zero tolerance** for all forms of corruption, bribery, or undue influence.

Gifts and hospitality must be characterized by openness, moderation, and a clear connection to the business relationship.

Human Rights

We respect and support internationally recognized human rights, following the UN Guiding Principles on Business and Human Rights and the ILO Core Conventions.

We are committed to identifying, preventing, and addressing any negative impact on human rights within our operations and supply chain.

Everyone should be treated equally and offered the same opportunities, regardless of gender, gender identity or expression, ethnicity, religion or belief, disability, sexual orientation, or age.

Working Conditions

We adhere to ILO conventions and the UN Global Compact principles on labor rights, and commit to:

- Fair working conditions and wages
- Gender equality
- Opposition to discrimination, child labor, and forced labor

We respect the right of all employees to organize freely.

We do not tolerate any form of harassment or offensive behavior at work.

Our anti-discrimination efforts comply with the Swedish Discrimination Act.

All employees must follow relevant policies and contribute to a good and safe work environment.

We have a **zero-accident vision** and work continuously to improve workplace safety and health.

All employees are covered by accident insurance.

We value a healthy work-life balance and actively support employees in achieving it.

All employees should receive relevant training and be offered opportunities for professional development.

Environment and Climate

We strive for a sustainable future by integrating environmental responsibility into our operations.

We work systematically to reduce environmental and climate impact throughout our value chain.

We are committed to setting targets in line with the **Paris Agreement** to limit global warming.

We apply the **precautionary principle** to prevent or minimize harm to the environment and human health.

We promote the use of environmentally friendly materials and suppliers, aim to reduce resource consumption, increase reuse, and minimize and recycle waste.

Community Engagement

We want to help create the conditions for sustainable societal development.

Our engagement and contributions are long-term, aimed at creating a better society, and involve our employees.