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Pandox Fair Play Code of Conduct for Business Partners

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Purpose and ambition

Pandox strives to conduct its business in a responsible and sustainable manner. This applies to Pandox's entire value chain. The purpose of the Code of Conduct for Business Partners is to create a consensus on Pandox's values. Pandox's Code of Conduct for Business Partners (the "Code") describes the guiding principles and expectations Pandox has of business partners, including suppliers.

Pandox has a long-term perspective and strives for long-term collaborations with its business partners. Through the Code, with respect for good business ethics and sound business practices, Pandox wants to contribute to a sustainable society where companies take economic, social and environmental responsibility.

The Code describes the minimum requirements that Pandox imposes on its business partners in business relationships with Pandox. The Code is based on the ten principles of the UN Global Compact¹ and the underlying conventions and declarations covering human rights, labour law, environmental protection and the fight against corruption

Pandox's commitments in relation to business partners are also informed by the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. Pandox has established processes for risk-based follow-up of compliance with the Code of Conduct, including dialogue with business partners, requirements for corrective actions in the event of identified deviations and mechanisms to enable reporting and handling of suspected human rights violations.

Business partners must comply with the applicable laws of the countries in which they operate. If the Code conflicts with national law, such legislation shall always prevail. If the Code has stricter requirements than national law, the Code takes precedence.

Scope and responsibilities

The Code applies to all parties with whom Pandox has a business relationship, such as suppliers, business partners or contractors, including subsidiaries and subcontractors. These are hereinafter referred to as "business partners". The Code also applies to all employees of the Business Partner, whether they are permanent or temporary workers and temporary agency workers ("Employees").

Pandox expects business partners to comply with the Code and works actively and systematically to ensure that all subcontractors they use in their supply chain, and all parties who otherwise perform services or are involved in assignments for Pandox, also comply with the Code. Business partners are responsible for ensuring that the suppliers in their supply chain comply with the requirements of this Code. Pandox expects business partners, suppliers and subcontractors to also undertake to provide or cooperate to compensate for adverse impacts, and to develop an effective complaints mechanism to enable redress.

For business partners, suppliers and subcontractors, the policy is available on the company's website. Expectations and requirements linked to the Code are primarily communicated in connection with supplier reviews and follow-up, where suppliers identified as high-risk suppliers are required to confirm that they have read and understood Pandox's Code of Conduct for Business Partners.

¹ [UN Global Compact](#)



Pandox has begun work to gradually strengthen the integration of the Code of Conduct into contractual relationships, including by including the Code as an appendix when signing contracts.

Pandox's Senior Vice President Director of Sustainable Business is responsible for the content of the Code of Conduct, any necessary updates to it, and together with each manager, its implementation in the organisation. The policy is adopted annually by Pandox's Board of Directors.

Human rights

Pandox expects all business partners, suppliers and subcontractors to work proactively and systematically to ensure that they respect and promote human rights in accordance with Pandox's human rights policy.

Sexual exploitation, prostitution and trafficking

Pandox has zero tolerance for crime or any form of sexual exploitation, prostitution or trafficking. Any suspicion of such activities should be reported to the hotel management. Pandox cooperates with the police and local authorities to prevent crime.

Fair and equal treatment

Business partners shall treat all employees with respect and dignity, and protect workers' right to privacy and privacy. Business partners may not discriminate against people on the basis of ethnicity, gender, sexual orientation, marital status, social status, parental status, religion, political opinions, nationality, disability, medical status, age or trade union membership. No forms of psychological, physical, sexual or verbal abuse, intimidation, threats or harassment will be tolerated.

Privacy and information security

Business partners shall take care to protect personal data in respect of any observations or information collected or obtained about customers and hotel guests, as well as about employees and other relevant parties. Confidential information regarding Pandox's operations or the activities of guests and customers may only be used for the purpose for which it was collected. Business partners shall protect confidential information and take appropriate technical and organizational measures to prevent loss, misuse, unauthorized access, alteration or disclosure, including improper communication or disclosure, of information to third parties.

Employment law

Child labour and young workers

Child labour is strictly prohibited and Pandox does not accept child labour anywhere in the supply chain. If the supplier employs young workers under the age of 18, the business partner must ensure that the young worker does not perform dangerous or heavy work, or work overtime or nights. The minimum age for work shall be in line with national law and shall not be lower than the age at which compulsory education is completed.

Forced labour

All work must be voluntary and workers should be able to leave their job or terminate their employment with reasonable notice. Business partners may not use physical punishment, lock up, threaten violence or exercise control over workers, for example by confiscating their identity

documents or other documentation, or by depositing money or the like that prevents workers from resigning voluntarily.

Terms of employment

All employees have the right to written employment contracts, in a language they understand and which specifies the terms of employment and termination. Business partners should not circumvent their employer responsibilities by hiring temporary workers, home workers, interns or similar arrangements.

Freedom of association and the right to collective bargaining

All employees shall have the right to form, join or not join any trade union or employee organisation. Employees should also have the right to collective bargaining without fear of reprisals.

Working hours

Business partners must ensure that a normal working week does not exceed 48 hours, and that overtime is voluntary. Overtime must be approved and limited to ensure decent working conditions.

Salaries and benefits

Employees have the right to equal pay for equal work. The business partner must ensure that all employees receive a fair wage, i.e. at least the minimum wage under national law. The business partner shall compensate employees for overtime work and ensure that all employees are insured and receive appropriate benefits. In cases where there is no statutory minimum wage, Pandox expects the business partner to be paid in accordance with the applicable collective agreement.

Health and Safety

The business partner shall provide employees with a safe and healthy working environment by working systematically to protect their health and safety. Risk assessments must be carried out regularly to identify occupational safety and health risks, followed by measures to prevent identified risks. The business partner must ensure that there is adequate fire protection in the work premises, that machines are equipped with protection and that personal protective equipment is provided to employees at the company's expense. Health and safety training shall be provided to employees on a regular basis. Work-related accidents must be reported, investigated and preventive measures put in place.

Environmental protection

Pandox's business partners are expected to comply with Pandox's environmental policy, which is available on Pandox's website via this [link](#).

The precautionary principle

The business partner must apply the precautionary principle in environmental and climate matters. The use and development of environmentally smart technology should be promoted and the activities conducted with as little impact on the environment and public health as possible.

Energy and greenhouse gas emissions

Energy should be used responsibly and the goal should be to achieve a reduced, optimized and more

efficient use of energy. The business partner must regularly monitor energy consumption and, as far as possible, prioritise the use of renewable energy sources. In addition, the business partner shall strive to minimise greenhouse gas emissions by identifying, monitoring, controlling and managing greenhouse gas emissions from its operations. The business partner must also strive for the mode of transport that has the least negative impact on the environment.

Emissions

The business partner shall, as far as possible, monitor, control and manage emissions to air, water and soil, as well as waste generated from operations. The business partner should also strive to reduce its waste and increase its reuse/recycling of resources. Water must be used responsibly and the business partner must strive to reduce its consumption and ensure that the water is purified appropriately.

Chemicals and hazardous substances

Chemicals and hazardous substances must be eliminated if possible, or kept to a minimum. When using chemicals or hazardous substances, the business partner should ensure their safe handling, storage and disposal. All substances must be labelled correctly and clearly. Safety Data Sheets (MSDS) must be readily available. The business partner must restrict and replace hazardous substances in accordance with the EU Regulation REACH² and Directive RoHS³.

Business ethics and anti-corruption

Business Integrity

Corruption in all its forms, including but not limited to bribery, lubricant payments and nepotism, is strictly prohibited. The business partner shall endeavour to prevent, detect and remediate financial crime including, but not limited to, extortion, money laundering, terrorist financing and fraud.

The business partner shall develop and implement an anti-corruption policy, as well as internal control measures. Training on corruption issues shall be provided to managers and employees in positions where there is a high risk of corruption, including purchasing, sales and financial transactions.

Bribes and gifts

The Business Partner shall not, directly or indirectly through intermediaries, request, offer, ask for, promise, give or receive a gift or improper benefits in exchange for a deal or other benefit from a party. Gifts with a monetary value, gift cards, cash or other gifts that can be considered cash are always considered inappropriate.

Hospitality and gifts should be characterised by openness and moderation. Giving, promising or offering benefits to a person who has authority in relation to, or makes decisions regarding procurement is not permitted.

Conflict of interest

² The REACH Regulation deals with the registration, evaluation, authorisation and restriction of chemical substances. REACH also contains requirements for users of chemicals, which does not exist in previous legislation.

³ The RoHS Directive aims to replace and restrict hazardous substances in electronics. The directive will also improve the possibility of profitable and sustainable recycling from electronic waste.

Business decisions should not be motivated or influenced by personal relationships or interests. Recruitment must not be based on cronyism or nepotism. The business partner shall not enter into financial or other relationships with a party if there is a risk of conflict of interest where objectivity cannot be ensured. The business partner shall identify where a conflict of interest could arise, document such situations and take measures to address identified situations. If a conflict of interest arises, the business partner must take preventive measures and inform Pandox of the situation.

Fair competition

The business partner must comply with the free trade agreement and competition laws, which means that participation in price cartels, market cartels or other types of cartels and price manipulation is strictly prohibited. The business partner must ensure that all taxes are paid in all local countries of operation and that there are no irregularities in transfer pricing. The business partner shall neither pay nor receive unlawful or lubricant payments, and must prevent direct or indirect financial crime, such as money laundering, fraud or embezzlement, by having a process in place to identify and manage such incidents.

Intellectual Property Rights

The business partner may only use Pandox's intellectual property rights, including trade secrets, copyrights, patents and trademarks, in accordance with the agreement and shall not appropriate or infringe the intellectual property rights of others.

Accounting and reporting

All transactions must be reported in accordance with generally accepted accounting principles and the records must accurately reflect transactions carried out. Business partners must prepare their financial statements on time and in a manner that gives a true and fair view of the company's financial statements and results.

Redress measures

Pandox undertakes, where applicable, to provide or cooperate on remedies for adverse impacts that the company has caused or contributed to. Pandox expects business partners, suppliers and subcontractors to manage and address the negative impact that arises as a result of their operations.

This means that:

- Identified negative impacts must be dealt with promptly and in accordance with applicable legislation, international guidelines and Pandox's requirements.
- Corrective measures shall be taken to limit or eliminate the impact and to prevent the recurrence of similar events.
- Redress to stakeholders, such as communities, ecosystems or other stakeholders, shall be made in a responsible, transparent and traceable manner, where relevant.

Follow-up and compliance

Pandox reserves the right to request that the business partner completes a self-assessment form. Furthermore, Pandox reserves the right to collect sustainability data from the business partner, as



well as to conduct on-site audits to check the business partner's operations and sustainability performance. The audits can be carried out by Pandox's employees or by a third party appointed by Pandox. The business partner must ensure that this is also possible with its subcontractors.

If a supplier comes out as red in Pandox's supplier audits, Pandox reserves the right to conduct site visits to the supplier to further evaluate their operations and sustainability performance as a result.

If a deviation from the Code is identified, the business partner must draw up a plan with corrective measures that Pandox must approve and which is then followed up together.

Pandox reserves the right to terminate the agreement with the business partner in the event of a material breach of the obligations described in this Code and the underlying conventions and declarations on which the Code is based, regardless of the action plan developed.

Business partners covered by the Code must be able to confirm, through an authorized representative, that the Business Partner is aware of the Code and will comply with it.

Expectations of business partners in terms of dialogue and engagement

Pandox expects all business partners to enable dialogue with their employees and other employees in the value chain on issues relating to working conditions, the work environment and human rights.

Business partners shall ensure that workers have access to appropriate and secure channels to express their views, complaints or concerns without the risk of retaliation.

Whistleblower function

A procedure for a whistleblower function is available via Pandox's website and enables business partners to report serious violations of the guidelines in this code.

If the business partner's actions are in violation of the Code or if the business partners are informed that the actions of one of Pandox's employees are not in accordance with this Code, the business partner can report the incident or suspected incident anonymously through Pandox's whistleblower service. See Pandox's Whistleblowing guidelines. The guidelines are available on Pandox's website and can be accessed via the following link: [WhistleB, Whistleblowing Centre](#).

Reporting of any violations of the Code will be treated confidentially and investigated appropriately. Any breaches are dealt with on a case-by-case basis and assessed on the basis of the nature, scope and potential impact of the breach.

For more information about Pandox's sustainability work, see www.pandox.se/sv/hallbarhet