

AKADEMIKLINIKEN

Business Relationships Code of Conduct

With this Business Relationships Code of Conduct (CoC) Akademikliniken seeks to ensure that our business relationships, incl. suppliers, demonstrate responsible business conduct by managing risks of adverse impacts in relation to sustainable development. Akademikliniken meets the globally agreed minimum standard and it is part of this responsibility to ask our business relationships to do the same.

The Global Standard

The areas covered by this CoC are founded on international principles for sustainable development; human rights (including labour rights), the environment (incl. the climate), and anti-corruption. The principles are listed in the UN Global Compact and made operational through the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD). Meeting the agreed standard for responsible business conduct as defined by the UNGPs/OECD is distinct from legal compliance. Business Relationships are always expected to comply with the law, wherever they operate. In addition, Akademikliniken expects all our business relationships to be familiar with and work to meet the globally agreed minimum standard for responsible business conduct (the UNGPs/OECD). Akademikliniken may levy additional requirements related to sustainable development, should circumstances require this.

Scope

The required management system shall, at a minimum, address risks of adverse impacts on the human rights stated in the International Bill of Human Rights, including the core labour rights from the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work; significant adverse impacts on the external environment in relation to the areas addressed by the Rio Declaration on Environment and Development, including the climate as reflected in the Paris Agreement; and adverse impacts on anti-corruption, as expressed by the United Nations Convention against Corruption.



Management Requirements

Meeting the minimum standard involves managing risks of adverse impacts in relation to internationally agreed principles for sustainability. This involves the following elements of a management system:

ADOPT A POLICY COMMITMENT

The Policy Commitment of our business relationships shall:

- *Be approved at the most senior level of their companies*
- *Be informed by experts in the areas covered by the UNGPs and OECD*
- *Stipulate their expectations of employees and business relationships*
- *Be publicly available and communicated both internally and externally*
- *Be embedded in all other operational policies and procedures throughout their companies*

ESTABLISH AND MAINTAIN A DUE DILIGENCE PROCESS

Business Relationships shall establish a process for conducting regular impact assessments of adverse impacts on the Scope (see above) to identify whether they are at risk of causing or contributing to adverse impacts through their own operations or services. They shall then act to prevent or mitigate both actual and potential adverse impacts identified, and actions shall be tracked to ensure effectiveness. Business relationships are expected to communicate about this process (findings, actions taken, effectiveness indicators and ongoing status) to relevant stakeholders, including Akademikliniken. The due diligence of our business relationships includes, that they require from their own business relationships that they meet the global minimum standard as well. If a business relationship becomes aware of an actual severe adverse impact that it is linked to, the business relationship must use or build leverage to make the causing or contributing entity stop the impacts and prevent or mitigate re-occurrences.

PROVIDE FOR ACCESS TO REMEDY

Where business relationships cause or contribute to actual adverse impacts, they shall provide for access to remedy to those affected through legitimate processes (grievance mechanisms) and/or notify the appropriate authorities.

Implementation

This CoC applies to all our business relationships. They shall require from their business relationships to have similar and adequate processes in place. Our business relationships shall be able to document that they pose similar requirements (UNGP/0ECD) to their relationships. Our business relationships must maintain appropriate records to demonstrate compliance with the requirements of this CoC. Appropriate records include: Policy statement(s), documentation of due diligence processes, including operational-level impact assessments and transparent records on tracking effectiveness of specific actions, documented grievance mechanisms, and documentation of similar requirements to business relationships.

The level of documentation that we require from business relationships may vary according to size and sector. For small and medium-sized enterprises, we expect them to know their risks and manage them appropriately. They shall be able to share with us how they manage their impacts, if asked. However, we will not require documentation of impact assessments; except if located in conflict affected areas or with known risks of severe adverse impacts.



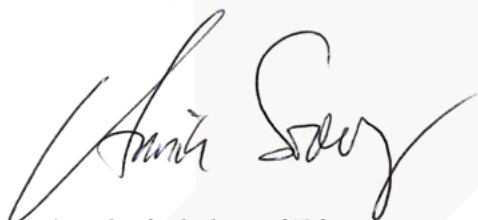
Akademikliniken implements the requirements outlined in this CoC as well. We are prepared to share our results with our business relationships. If it is the first time our business relationships meet these requirements, we will accordingly give ample time for implementation. We expect business relationships to develop and adopt a policy commitment within one year from the first time they received this CoC. We expect them to be able to show us impact assessments from sites in direct relation to us within two years.

This CoC forms the foundation for the collaboration between Akademikliniken and our business relationships. Should our business relationships not have implemented a management system in alignment with this CoC at the time of signing, an implementation plan should be developed and, if required, presented to Akademikliniken. We expect our business relationships at any time to be able to declare their stage of implementation in relation to the requirements contained in this CoC.

Should Akademikliniken's business relationships cause, contribute to, or be linked to severe impacts, our business relationships shall notify Akademikliniken immediately. The notification shall include an account of the actions to end the severe impacts and to prevent or mitigate their re-occurrence. If business relationships neglect to notify Akademikliniken of or to address severe impacts, or if they demonstrate lack of willingness to meet the international minimum standard, we reserve the right to end the business relationship immediately.

Stockholm, Sweden

August 2020

A handwritten signature in black ink, appearing to read 'Annika Söderberg', written in a cursive style.

Annika Söderberg, CEO