

# **HR Policy**

*FINAL VERSION*

**ADAPTEO**  
**Building adaptable societies**

**Adapteo.**

**REVISED BY ADAPTEO BOARD OF DIRECTORS**

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## **1. Definition of the framework**

### **1.1 Background and purpose**

This HR Policy is the governing document for HR across Adapteo Group (hereafter “Adapteo”). The HR policy acts as a governance document for all HR processes and an overview of other related policies with regards to what our employees can expect from Adapteo as their employer as well as how we expect our employees to act and operate within the company.

This policy - along with the Adapteo Code of Conduct and local laws & regulations - constitutes the foundation for people management processes for all Adapteo employees and subcontractors in all our activities, at every level in the company and in every market in which we operate. In addition to this policy there are employee handbooks available for each country, these documents regulates nation specific personnel matters.

Managers have a special responsibility to be role models in demonstrating the desired behaviors as outlined in the policy and to proactively enforce the policy on a day to day basis.

### **1.2 Applicability**

The principles defined in this document must be followed by all Adapteo Group subsidiary companies, business units, management and employees. Contract employees of Adapteo Group must also be aware of and shall follow the principles defined in this document as applicable.

### **1.3 Status and relationship to other policies**

This document has been approved by the Board and is a part of Adapteo Group policies. Other HR related instructions within Adapteo Group shall be in line with the content of this document.

### **1.4 Ownership and changes to the policy**

The SVP HRD is the owner of this document and oversees that other policies and other operational guidelines are aligned with this document and shall propose any necessary changes to them.

Any changes to this document shall be approved by the Board.

### **1.5 Effectiveness**

This document is effective as of 18<sup>th</sup> of June 2019 and until further notice.

## 2. Policy statement

The following statements apply for Human Resources within Adapteo:

### 2.1 Our purpose and how we work

Our purpose is “Building adaptable societies”. We believe that society will go through immense change in the years to come. As our ways of life, user needs, and society evolve, facilities have to transform accordingly. By providing buildings that adapt to people and the planet we enable societies to become resilient and sustainable.

We do this by being proactive, collaborative and committed, always with our customers’ best in mind. We seek collaborations in every area, both internally and externally, and we are committed to delivering the best solutions to our customers at all times. **Our three guiding principles when fulfilling our purpose are:**

- **Proactive** - We approach everything from the perspective of the customer and their end-user. We use our initiative and expertise to exceed expectations. We strive to position ourselves as first-choice to our customers in the flexible real estate industry.
- **Collaborative** - To fulfil our potential we must share our expertise and strengthen our ways of working internally, making us even more effective and efficient. We strive to create solutions that are made for the many, always with people and planet in mind.
- **Committed** - We build trust by being clear on both what and how we deliver, and then staying true to that, every time. We are responsible and transparent, internally and with customers so there are no surprises.

### 2.2 Equality, Diversity Anti-discrimination & Inclusion

Adapteo is a firm believer in equal opportunities for employment, training, and career advancement. We aim for job satisfaction, commitment and security for all employees, and to apply equal rights, obligations and opportunities regardless of sex, gender identity, gender expression, age, sexual orientation, disability, ethnicity, religion or other belief for all employees. The work on equality and diversity should be conducted effectively in compliance with local laws and in cooperation with employees and labor unions.

#### 2.2.1 Harassment and Discrimination

Adapteo has a zero tolerance towards discrimination or harassment based on gender, ethnicity, religion or other belief, sexual orientation, gender identity or expression, disability or age. In the event of such behavior, all employees are obligated to intervene and report the behavior. All forms of discrimination, harassment and bullying is investigated, appropriately handled and followed-up upon. It is an employee’s closest manager’s responsibility to make sure that a complaint of harassment or offensive behavior is recognized, taken seriously and addressed.

## **2.2.2 Gender balance**

Adapteo operates in a male dominated industry. We do however actively promote an even gender balance in the company. We strive for advertised positions to be sought by both woman and men.

## **2.2.3 Parental leave at Adapteo**

At Adapteo we want to ensure work-life balance by enabling employees to combine work and parenthood. Parental leave is a crucial aspect of that promise and employees on leave are encouraged to participate in social events and are always able to contact Adapteo for information. Please see your local employee handbook to find our countries benefit package when on parental leave.

## **2.3 Work environment, Health and Safety**

Employees at Adapteo operates in sometimes dangerous environments such as building sites. Adapteo will never compromise its employee's safety at work. Employees at Adapteo must work accordingly to national or local occupational safety and health (OSH)-regulations. Managers have the responsibility for ensuring the well-being of the employees, including a reasonable workload in compliance with labor laws.

Adapteo is committed to ensure OSH of our employees in every aspect related to the work. We apply ongoing risk assessment of all aspects of work that considers: what could cause injury or harm, whether the hazards could be eliminated and, if not, what preventive or protective measures are, or should be, in place to control the risks. Health and safety issues are treated with openness and care and includes physical as well as mental illness. Risks are identified and analyzed, and when necessary, measures shall be taken immediately to correct any OSH-risks.

Adapteo is a drug-free workplace. Adapteo as an employer, but also all employees have a shared responsibility to ensure an effective and good working environment without the use of drugs or the abuse of alcohol.

## **2.4 Recruitment and on-boarding**

Adapteo puts immense emphasis on ensuring our competitive advantage and spearhead the development of new solutions for adaptable buildings. It is therefore crucial to attract, screen and recruit the right people with the right values, competencies and skills, and in accordance with our commitments to Equality, Diversity, Anti-discrimination & Inclusion (See section 2.2). We therefore apply a thorough process to define recruitment needs, attract, select as well as decide and introduce new recruits. The line manager is responsible for operating the hiring process, however, the SVP HRD is the owner of the process.

The conditions of employment offered to employees must meet the minimum requirements in national law and/or collective agreements. Our employees are entitled to form or join a trade union and we respect the rights of our employees and their trade unions to negotiate collective agreements. Adapteo is connected to various trade unions through collective bargain agreement in the countries that we operate. Please read your country's employee handbook for applicable collective agreements or relevant legislation.

An efficient on-boarding process is essential to ensure rapid commitment to the goals, values and culture of Adapteo and to give our new recruits a solid foundation to embark on their employment with us. The on-boarding processes applies to all new internal or external recruits and the hiring manager is accountable for its deployment, execution and for making sure that it follows the local guidelines.

Lastly, it is the responsibility of the hiring manager to ensure that all new employees are informed about our Code of Conduct. The SVP HRD is the owner of the on-boarding process.

## **2.5 Develop and retain**

Performance and competence development are key focus areas at Adapteo. Adapteo's performance and development framework seeks to balance business needs and requirements with individual career development objectives as well as taking into account the perspective of work-life balance. The SVP HRD is the owner of the performance and development processes.

### **2.5.1 Formal performance management and competence development**

Our employee dialogues are equally reflective as forward-looking with follow up of the recent and planning of future performance development. Adapteo applies an agreed structure with one formal dialogue per year, fine-tuned and reviewed through the ongoing "One-to-One's" to be conducted at least bi-monthly.

All our employees are entitled to a Performance & Development Plan with individual results, competence goals and activities together with short and long term development activities. Goals should be Specific, Measurable, Attainable, Relevant and Time based.

Both the employee and the manager is responsible to come prepared for each dialogue. Ahead of the target and performance dialogues, each team leader is accountable to conduct competence assessment and planning for the team, in order to ensure that we develop the right skills for the future. The competence plan then provides input to the individual performance and development plan. To ensure this managers need to be attentive to the P&D process for every individual in the organization.

### **2.5.2 On the job training and informal feedback**

Adapteo is well aware that the most important competence development happens while working, therefore continuous follow up and feedback is a very important supplement to the formal performance and development process. All managers are accountable to provide ongoing feedback to their employees as well as required on the job training and coaching to ensure ongoing improvement and development.

## **2.6 Compensation and salary review**

Adapteo attracts, retains and motivates employees through the use of correct and fair compensation and benefits. Adapteo apply national based compensation determination in accordance with our commitments to equality, diversity and inclusion, and in compliance with labor laws and collective agreements.

## **2.7 Termination and discharge**

Adapteo works in close cooperation with local unions to manage separation and termination in accordance with local employment protection laws.

The leadership is accountable to ensure that:

- HR process for termination of employment is used and followed in accordance with local law
- Ensure the transfer of knowledge to the organization, make sure that the employee have documented the important parts of his or her tasks to facilitate the replacement
- Offer the employee to have an exit dialog

## **2.8 GDPR compliance**

Adapteo's management is accountable to ensure compliance with the General Data Protection Regulation and national laws with regard to the processing of employee data and the free movement of such data. This includes;

- Ensuring that all processing of personal data is minimized to what is business critical
- Before processing of employee data, the employee must be informed about what information is processed, what it is used for, and how to modify, correct or withdraw the information.
- Transfers to third parties, including publication on the Internet, is allowed only according to the above and when adequate protection is in place

## **2.9 Social media guide**

At Adapteo we apply the same ethical standards when using social media as we would in other kinds of interactions between people. The goal is to avoid activities and expressions in social media/forums that may damage Adapteo's reputation and result in a possible conflict between us as an employer and you as an employee. It is important that all employees pay's attention to the fact that content at social media are available for a range of users over a longer period of time. Information that is published on social networks/discussion forums can cause unwanted consequences for you as a person.

## **2.10 Anti-bribery and anti-corruption**

Adapteo is strongly committed to comply with applicable antitrust laws that prohibits illegal agreements between competitors that undermine competition. For additional information on our stance we refer to our Code of Conduct and our Anti-Fraud Policy.

## **3. Audience**

This policy applies to all entities within Adapteo group.

#### **4. Implementation**

Implementation of the policies is ultimately the responsibility of the management.

#### **5. Roles and responsibilities**

The SVP HRD is the owner of the HR policy.

#### **6. Exceptions**

Any need for exceptions to this policy must be clearly defined and documented. All exceptions shall be approved by the board.

#### **7. Monitoring of compliance**

Measurement includes:

- Signing of Code of Conduct
- Evaluation according to HR risks in the control-matrix
- A yearly employee engagement survey for following up on employee motivation, leadership style and effectiveness and non-discrimination according to the statements of this policy

#### **8. References**

- National employee handbooks
- Code of Conduct
- Anti-Fraud Policy
- Fraud Investigation Procedures
- Whistleblowing Policy

#### **9. Links**

- EU Commission: Employment, social affairs and inclusion
- EU - Data protection in the EU
- EU Occupational Safety and Health (OSH)
- Swedish Work Environment Authority (Arbetsmiljöverket)