



GUIDELINE



Sustainability Guideline



Document Information

Document Holder (name and title)	Kerstin Lindvall, Chief Corporate Responsibility Officer
Related Documents (<u>governing document/s</u>)	Sustainability Policy Sustainability Guidelines Retail and Pharmacy (instruction) ICA Banken instruktion för hållbarhetsarbete ICA Fastigheter hållbarhetsriktlinjer (instruction)

Distribution, Confirmation and Implementation

This steering document shall be distributed to the following functions or roles and shall be confirmed in accordance with the table below.

Confirmation required for the steering document	Read	Implemented
IMT	X	X
IMT + 1	X	X

IMT means the ICA Management Team. IMT+1 means an employee with managerial function reporting directly to an IMT Member.

By confirming that the steering document has been **READ**, the recipient acknowledges having read and understood the contents of the policy.

By confirming that the steering document has been **IMPLEMENTED**, the recipient:

- has informed all pertinent persons within his/her respective unit of the content of this steering document; and
- has established a process to ensure that the principles and the minimum requirements of the steering document will be followed within his/her respective unit.

Versions

This steering document has been updated since implementation and the most important changes are listed below.

Version (20XX:X)	Major changes since last version
20	Guidelines split into common Sustainability Guidelines for ICA Gruppen (this document) and sector-specific guidelines
2024:1	General review to adopt new structure.

1 Introduction

1.1 Background and purpose

ICA Gruppen believes that sustainability work and strong community engagement goes hand in hand with long-term profitability. Sustainability is a strategic priority and is integrated into all of ICA Gruppen's operations. ICA Gruppen's operations extend across many areas: Grocery retail, Pharmacy business, Construction and Real Estate operations, as well as Banking and Insurance services. The breadth of the business means the Group has an impact in a great many areas. ICA Gruppen aims to develop our business with the customers and long-term sustainability in focus. Customers and other stakeholders must feel secure and have confidence in ICA Gruppen and its business.

ICA Gruppen has signed the UN Global Compact and has committed to its Ten Principles covering human rights, labour conditions, the environment and anti-corruption. Together with the UN's Sustainable Development Goals and ICA Gruppen's policies and general guidelines, they form the framework for ICA Gruppen's sustainability work.

ICA Gruppen's firm conviction is that all business must take place under fair and decent conditions. ICA Gruppen's sustainability work must be credible and transparent, and based on the company's actual and potential impacts on people, the environment, and communities. The work is based on the UN Declaration of Human Rights, the UN Convention on the Rights of the Child, the core conventions of the International Labor Organization (ILO), the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

ICA Gruppen's suppliers and other business partners must comply with the legislation in force throughout their operations in the countries where they operate.

The Sustainability Policy and the general guidelines describe ICA Gruppen's overarching position on sustainability matters beyond the requirements set out in the legislations. All of ICA Gruppen's employees, suppliers and business partners are expected to follow these.

The areas of tax, business ethics, the work environment, and diversity and inclusion are areas linked to sustainability and are subject to separate policies and guidelines.

1.2 Scope

The general sustainability guidelines apply to all operating companies (OpCos) within ICA Gruppen. Guidelines for Banking and Insurance, Construction and Real Estate operations, and Retail & Pharmacy can be found in ICA Gruppen's sector-specific guidelines.

2 Sustainability Guidelines

2.1 Information about ICA Gruppen AB's sustainability work

Through clear communication ICA Gruppen provides a transparent account of the sustainability work to both internal and external stakeholders. Companies within ICA Gruppen will actively provide information about the sustainable value added to our products and services, and market them accordingly. ICA Gruppen reports annually on the progress made around corporate responsibility and sustainability, both in annual reports and on ICA Gruppen's website.

Regardless the subject ICA Gruppen's customers, employees, suppliers and business partners shall have clear channels to contact us.

2.2 Quality assurance of product, services and suppliers

All products and services provided by OpCos within ICA Gruppen shall be safe and functional as well as being environmentally and ethically acceptable. ICA Gruppen shall work by a due diligence process to ensure that negative impacts on human rights, climate and the environment in the value chain are identified and handled proactively.

ICA Gruppen encourages customers to adopt a healthy and sustainable lifestyle by offering an inspiring and accessible assortment of products and services that also takes into consideration customers with special needs.

ICA Gruppen's suppliers and other business partners must comply with the legislation in force throughout their operations in the countries where they operate. ICA Gruppen's requirements may go beyond what is set out in law. Suppliers and business partners must ensure that the products or services they provide to or via companies within ICA Gruppen fulfil these requirements. ICA Gruppen takes a positive view on local production.

ICA Gruppen has relationships with suppliers and not with countries. We follow the UN's and national government recommendations with respect to business relations with companies abroad.

2.3 Human rights

It is ICA Gruppen's firm conviction that all business must take place under fair and decent conditions. ICA does not accept discrimination, child labor, forced labor, violation of the right to freedom of association and collective bargaining, or any other failure to respect human rights. In all its operations and value chains ICA will use a risk-based approach to identify any risk of violation of human rights to then take appropriate action to minimize such risks.

ICA Gruppen's work is based on the UN Declaration of Human Rights, the UN Convention on the Rights of the Child, and the core conventions of the International Labor Organization (ILO). This is made clear in the company's agreements with all suppliers. ICA's suppliers of services and products are expected

to meet the requirements set out in the above and must also themselves work to minimize the risk of violation of human rights in their value chains.

2.4 Environment and Climate

ICA Gruppen works to achieve a continual decrease in the negative impact of our activities on the environment and climate. ICA Gruppen's environmental and climate work is an integral part of investment decisions and daily operations. It involves defining material environmental aspects such as energy use, transport, and refrigerants, and continually improving these in a resource-efficient way.

ICA Gruppen's work on environment and climate aims to contribute to globally agreed targets, based on science. This includes consideration of the impact not just of our own operations, but also from our value chain through our relationships with suppliers and our customer offering.

2.4.1 Transport and business travel

ICA Gruppen seeks to achieve a continual decrease in the environmental impact of transport and business travel. ICA Gruppen's ambition is to increase resource efficiency and the use of renewable fuels.

2.5 Energy

ICA Gruppen works continually to reduce our energy consumption and improve our energy efficiency. Stores, warehouses, and offices should maximize the use of renewable energy sources.

2.6 Health

ICA Gruppen will actively contribute to improved public health by leveraging the strength of our entire organization. This is always based on a scientific approach and official recommendations from relevant authorities.

3 Guidance, Compliance and Reporting

If you have any questions regarding this steering document, please consult with your immediate manager or with your OpCo CR Manager.

The CEOs of the respective OpCos are responsible for implementation of and compliance with applicable sector-specific sustainability guidelines as well as these general sustainability guidelines that apply throughout ICA Gruppen.

Each member of the ICA Gruppen Management Team (IMT) is responsible for ensuring, within their area of responsibility, that work within ICA Gruppen is conducted in accordance with these guidelines. This responsibility includes ensuring that sufficient competencies and resources are available. Each manager is responsible for communicating these guidelines to their employees. Each employee has a responsibility to act in accordance with this governing document, thereby contributing to ICA Gruppen's

ambition to be a leader in corporate responsibility. It is the IMT's responsibility to approve new versions of the general sustainability guidelines.

The Board of Directors' tasks include deciding policies for sustainability, establishing the structure for the company's sustainability reporting (annual and quarterly), and monitoring the company's work on sustainability.

Employees within ICA Gruppen's companies and stores shall be aware of the sustainability requirements that apply and shall ensure compliance with these within their respective product and business areas. The ambition is to constantly involve all ICA Gruppen's employees in the sustainability work, keeping them informed and providing ongoing training.

ICA Gruppen's working practices for sustainability will be regularly reviewed and evaluated to ensure continual improvement.

CR Group Management will monitor ICA Gruppen's compliance to the sustainability Guidelines and report this to ICA Gruppen's Management Team. Due diligence is used as one of our tools.

Exemptions from the general sustainability guidelines must be approved by ICA Gruppen's CEO.

Any deviations from this steering document shall be reported to CR Group Management.

4 Updates and Reviews

This document shall be reviewed and updated annually or as needed based on the recommendations of Chief Corporate Responsibility Officer, who also ensures that the latest version of the Sustainability Guidelines is published on ICA Gruppen's intranet and external website.