



EXTERNAL CODE OF CONDUCT

Purpose and Scope

ALFA Development seeks to collaborate with suppliers who share our ambition to create responsible, sustainable, and long-term solutions in real estate development and construction. This Supplier Policy outlines the requirements and expectations we place on all suppliers and subcontractors involved in our value chain. The policy is based on international standards such as the UN Guiding Principles on Business and Human Rights (UNGPR), the OECD Guidelines for Multinational Enterprises, ILO core conventions, and the EU's requirements for responsible business conduct.

We expect all suppliers to act in accordance with both national laws and these international principles, and to communicate these requirements to their own partners.

The term business relationships refer to any entity, actor, or subcontractor that directly or indirectly contributes to ALFA Development's activities, products, or services. Suppliers are therefore expected to ensure that this policy is communicated to relevant actors in their value chain to ensure the requirements are understood and implemented in practice.

Human Rights, Labor Rights, and Working Conditions

ALFA Development expects all suppliers to respect internationally recognized human rights and actively work to prevent negative impacts on employees and local communities. This includes, No child labor, Children under the age of 15 must not be employed on our projects. Youths aged 15 to 18 may only perform work that does not pose a risk to their health or safety. No forced labor: Forced labor, debt bondage, or any form of involuntary work is strictly prohibited.

Decent working conditions must be ensured, including safe housing if accommodation is provided. No discrimination based on gender, age, ethnicity, religion, sexual orientation, disability, or any other protected characteristics. Equal treatment for migrant workers, with access to the same safety, pay, and welfare as all other employees.

Wages and employment terms must at a minimum comply with applicable laws and industry standards. In the absence of a collective agreement, conditions should match the norm for similar work.

A safe and healthy work environment is a prerequisite for collaboration with ALFA Development. Suppliers must comply with applicable health and safety laws, offer appropriate safety training and equipment, and ensure employees can report concerns freely and without retaliation.



Environment, Climate, and Responsible Resource Use

As a real estate developer, ALFA Development aims to minimize environmental and climate impact in all projects. We expect suppliers to actively work to reduce their environmental footprint, comply with environmental regulations, integrate sustainable solutions in their operations, prioritize low-emission materials, and document materials through Environmental Product Declarations (EPDs) where possible. In demolition and renovation projects, suppliers must follow selective demolition principles and ensure proper waste sorting.

Suppliers must be able to document material flows, including what is reused, recycled, or sent to landfill. ALFA Development aims to reuse materials from its own projects and expects suppliers to collaborate in ensuring the highest possible level of circular resource use.

Ethical Business Practices and Anti-Corruption

ALFA Development has a strict zero-tolerance policy toward corruption and bribery. Suppliers must not offer, give, or receive any services, gifts, or benefits that could influence or create doubt about a business decision.

We expect suppliers to have appropriate policies, controls, and practices in place to prevent corruption, and to actively identify and report any incidents. Suppliers are also expected to comply with fair competition rules and must not participate in cartels, price-fixing, or other illegal or unethical market behavior.

Tax Practices and Financial Responsibility

Suppliers must pay taxes in accordance with local laws in the countries where they operate and must not engage in aggressive tax planning. A transparent and responsible approach to tax and financial management is expected as part of good corporate governance.

Collaboration, Transparency, and Due Diligence

Strong partnerships are built on openness and dialogue. Suppliers must inform ALFA Development if they use subcontractors on our projects or if they become aware of sub-suppliers in their value chain associated with potential negative impacts.

We may request information on relevant subcontractors, including company names and employee identification, if required for compliance or safety.

Suppliers are expected to have processes in place to identify, prevent, and mitigate negative impacts in accordance with the OECD Due Diligence Framework. Where appropriate, ALFA Development will support less resourceful suppliers in meeting these requirements to foster strong, long-term relationships.



Grievance Mechanisms and Managing Negative Impacts

If suppliers become aware of non-compliance with this policy or of negative impacts they cause, contribute to, or are directly linked to, they must report this immediately to ALFA Development.

All suppliers and their employees have access to our grievance mechanism, where serious issues can be reported anonymously and without fear of retaliation.

We expect constructive collaboration to remedy and prevent negative impacts, in line with the UNGP principles on effective remedy and responsible risk management. Inquiries can be submitted via the following [form](#)

Compliance and Consequences

Compliance with this Supplier Policy is a fundamental condition for collaboration with ALFA Development. In cases of non-compliance, we may require corrective actions, increased supervision, or conduct audits.

In cases of serious or repeated violations, the collaboration may be terminated. Termination will be handled responsibly, ensuring proper completion of ongoing tasks and minimizing risk.

Closing Remarks

This Supplier Policy is a vital part of ALFA Development's commitment to responsible business conduct and high quality throughout all phases of our projects.

We seek partnerships built on trust, accountability, and shared ambition to create sustainable and value-generating solutions for people, the environment, and society.

This policy has been developed internally within the organisation with external support and has been approved by executive management. The policy is reviewed annually and revised as necessary.

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