



POLICY

Sustainability Policy



Document Information

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| Document Holder (name and title) | Kerstin Lindvall, Chief Corporate Responsibility Officer |
| Related Documents (<u>governing document/s</u>) | Sustainability Guidelines ICA Gruppen 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 |
|---|------|-------------|
| ICA Gruppen Board of Directors | X | X |
| 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 steering document.

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 |
|------------------|--|
| 2024:1 | General review to adopt new structure (esp. sections 3-4) and to include due diligence |

1 Introduction

1.1 Background and purpose

ICA Gruppen believe 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 aim 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 Sustainability Guideline 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 Sustainability Policy apply to all operating companies (OpCos) within ICA Gruppen.

2 Sustainability Policy

Sustainability efforts form a natural and integral part of ICA Gruppen's operations and strategies. They help enhance the Group's long-term competitiveness and the aim is to create long-term value for both ICA Gruppen and the Company's stakeholders. By virtue of its size, ICA Gruppen has a great responsibility – but also the capacity and opportunity – to contribute and influence developments in a

positive direction. ICA Gruppen's sustainability work is wide-ranging and spans many different areas – the environment, health, inclusion and diversity, social responsibility, and quality.

- ICA Gruppen's products and services sold or otherwise made available by ICA Gruppen shall comply with applicable legislation. They shall also live up to the expectations of our customers and other stakeholders in the markets where we operate, in terms of function, safety, social compliance, health and impact on the environment.
- ICA Gruppen shall be, and be perceived as, responsible, and progressive in matters of sustainability.
- ICA Gruppen shall maintain a high standard of quality while constantly reducing the environmental impact.
- 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 shall meet society's expectations on openness and honesty. ICA Gruppen shall listen to customers and other stakeholders, using their opinions to help promote sustainable business growth.
- ICA Gruppen continuously improves and seeks out new knowledge and technologies and implements them, step by step, in the operations. In this way, our common resources are used to the benefit of society, ICA Gruppen and our stakeholders.
- ICA Gruppen's objective is to provide factual, reliable, and relevant information and communication that enables customers to make their own sustainable choices.

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.

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 this policy.

This responsibility includes ensuring that sufficient competencies and resources are available.

Each manager is responsible for communicating this policy to their employees. Each employee has a responsibility to act in accordance with this steering document.

It is the responsibility of ICA Gruppen's Board of Directors to approve new versions of the Sustainability Policy.

CR Group Management will monitor ICA Gruppen's compliance with the sustainability Policy and will report this to ICA Gruppen's Management Team and the Board of Directors.

Exemptions to the Sustainability Policy must be approved by ICA Gruppen's Board of Directors.

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 Policy is published on ICA Gruppen's intranet and external website.