

Citycon's Business Code of Conduct

DOING BUSINESS WITH CITYCON

Citycon's key purpose is to develop and maintain an economically sound and prosperous business. Citycon adheres to the principles of sustainable development and offers environmentally, socially and economically sustainable shopping centres providing an enjoyable experience for visitors and a pleasant working environment for people working in. At Citycon, sustainable business means financial efficiency and effectiveness, ethical business conduct and solutions which take account of the environment.

Citycon's commitment to embrace ethical principles in all Citycon's business decisions and actions is expressed in Citycon's [Code of Conduct](#). The Code of Conduct applies to every employee and executive of Citycon (including employees of our subsidiaries and joint ventures over which Citycon has management control).

This business code of conduct (the **Business Code of Conduct**) sets forth the standards of business behavior and ethics Citycon expects of its business partners as well as personnel employed by or engaged to provide services to such business partners. The Business Code of Conduct is based on Citycon's Code of Conduct. Adherence to high ethical principles will help to ensure both Citycon's and its business partners' reliability and sustainability in the market.

KEY COMMITMENTS

Integrity, transparency and compliance with legal requirements

Citycon is a publicly traded company committed to transparency and working with high integrity. The company consistently complies with the applicable laws and regulations of Citycon's operating countries in the Nordic and Baltic region. Citycon communicates its status and performance openly and directly with public statements that are fair, accurate, timely and understandable. Citycon expects comparable integrity, transparency and compliance of its business partners.

Fair dealing

Citycon is committed to fair and honest dealing in all its interactions with its business partners. Citycon respects intellectual property rights and confidentiality of business secrets of its tenants and other business partners. Citycon promotes effective competition and takes no action that might impede it. Citycon expects equal fairness of its business partners.

Citycon's responsibility as employer and respect for human and labour rights

Citycon provides a healthy, safe and respectful work environment for all personnel as well as any other persons working for Citycon. Citycon personnel reports all work-related accidents

and injuries, unsafe equipment, practices or conditions as well as any potential discrimination and harassment without delay. Citycon cultivates personal and cultural diversity. Citycon supports internationally acknowledged human rights as expressed in the [Ten Principles of United Nations Global Compact](#) and the basic labour rights stated in the [International Labour Organization's \(ILO\) Declaration on Fundamental Principles and Rights at Work](#). Citycon employees, executives and all other persons representing Citycon seek to avoid conflicts of interest and activities that may create appearance of impropriety. Citycon expects that its business partners also act responsibly as employers and support human and labour rights.

Safe and environmental friendly shopping centres and environments

Citycon takes good care of the design, construction, maintenance, repair and use of its properties throughout their life cycle. Citycon takes prompt action to remedy situations and equipment which may compromise the safety or security of its shopping centres and arranges regular safety training to all people working in the centres. Citycon is continuously looking for opportunities to improve its environmental performance by reducing greenhouse gas emissions, energy use and waste in all its operations. The company is committed to promoting the well-being and prosperity of the communities where Citycon operates. Citycon expects its business partners within the scope of their operations to support Citycon's actions towards safe and environmentally friendly shopping centres and environments.

Anti-bribery, business gifts and hospitality

Citycon is utterly opposed to bribery and corruption. Citycon employees, executives and persons representing the company may only offer or accept gifts or hospitality of nominal value from its current or prospective business partners and shall ensure that such offering or acceptance does not influence business decisions, oblige either party or create expectations of anything in return. All acceptable gifts and hospitality shall be given openly and shall not cause any doubt of the integrity of Citycon or anyone else. Citycon employees, executives and persons representing the company do not promise or pay bribes or illegal payments to government authorities or anyone else and are committed not to incite or advise anyone to offer or accept bribes, kickbacks or any facilitation or other improper payments. Citycon makes no political contributions. Citycon expects its business partners to strictly adhere to 'no' bribery and corruption as their policy.

Privacy

Citycon respects privacy and all individuals' related rights. Citycon only collects personal data on legal grounds and for its reasonable, necessary and transparent business purposes. Personal data is processed carefully and data quality and confidentiality is ensured. Citycon complies with best practices in processing and protecting personal data. Citycon expects equal respect of privacy and protection of personal data of its business partners.

EMBRACING CITYCON'S BUSINESS CODE OF CONDUCT

Citycon expects its business partners to fully embrace the principles set forth in this Business Code of Conduct and act accordingly. If you have doubts whether your actions are acceptable by law or under this Business Code of Conduct you should discuss with your contact at Citycon. Actions inconsistent with Citycon's Business Code of Conduct must be corrected promptly. If such inconsistent action is not corrected, Citycon may at the utmost choose to terminate the agreement or an existing business relationship.

SPEAK UP

Citycon's business partners can report any suspected or detected violations of Citycon's Code of Conduct by Citycon's employees, executives or other persons representing Citycon via [whistleblowing line](#) available on the company's website.