

Sustainability Policy

ICA GRUPPEN

Changes/updates

1.1 Background and purpose

- Text has been partially rewritten to better harmonize with and reflect text from ICA Gruppe's website and annual report regarding background and purpose of ICA Gruppen's sustainability work. Scope unchanged.

1.2 Scope

- Language corrections.

1.3 Communication and implementation

- Language corrections.

2. Sustainability Policy

- Changes made to better aligns the policy with language and expressions that ICA uses to explain our commitment and responsibilities regarding sustainability. Scope is still unchanged.

3. Roles and responsibilities

- Language corrections.
- **New text:** "There shall be a Sustainability Committee to the Board of Directors. Among other duties, the committee will draft policies for sustainability and business ethics. It is the responsibility of ICA Gruppen's Board of Directors to approve new versions of the Sustainability Policy".

Old text: "There shall be a Sustainability Committee, which duties are grounded in the Corporate Governance Code's instructions on a board's responsibility for setting the framework for the company's role in society. Among other duties, the committee will draft policies for business ethics and sustainability, set the structure for the company's sustainability reporting (annual and quarterly) and monitor the company's work with business ethics and sustainability. It is the responsibility of ICA Gruppen's Board of Directors to approve new versions of the Sustainability Policy".

4. Exemption management

- Language corrections.

5. Compliance

- **New text:** CR Group Management will monitor ICA Gruppen's compliance to the sustainability Policy and will report this to ICA Gruppen's Management Team and the Board of Directors.

Old text: CR Group Management shall monitor ICA Gruppen's risk profile and actions and report to the ICA Gruppen Management Team and the Board of Directors on their view including any noncompliance with this policy.

6. Annual review

- **New text:** This policy shall be annually reviewed by the Chief Corporate Responsibility Officer and submitted to the Board of Directors for approval.

Old text: The Sustainability Policy's annual review is managed by the Chief Corporate Responsibility Officer and submitted to the Board of Directors for approval.

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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 sustainability work must be credible and transparent, and based on the company's actual and potential impacts on people, the environment, and communities. 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 & 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.

1.3 Communication and implementation

Chief Corporate Responsibility Officer ensures that the latest version of the Sustainability Policy is published on ICA Gruppen's intranet.

The responsibility for implementing this policy is described under section 3 below.

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 meet society's expectations on openness and honesty. ICA 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's objective is to provide factual, reliable, and relevant information and communication that enables customers to make their own sustainable choices.

3 Roles and responsibilities

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 governing document.

There shall be a Sustainability Committee to the Board of Directors. Among other duties, the committee will draft policies for sustainability and business ethics. It is the responsibility of ICA Gruppen's Board of Directors to approve new versions of the Sustainability Policy.

4 Exemption management

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

5 Compliance

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.

6 Annual review

This policy shall be annually reviewed by the Chief Corporate Responsibility Officer and submitted to the Board of Directors for approval.