



GUIDELINE

Sustainability Guideline



1 Introduction

ICA Gruppen AB, including its subsidiaries, (the “Group” or “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 shall conduct our business in compliance with all applicable laws and regulations. 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 guidelines, this forms 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 where ICA Gruppen prioritise mitigating measures focusing on our most severe impacts. 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 by law. This applies to all employees, consultants and board members (“ICA Personnel”) and subsidiaries within the Group (“OpCO”).

Likewise, we expect our suppliers and business partners are expected to follow these whenever applicable and act in an ethically responsible way.

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

The sustainability guideline apply to all OpCos within ICA Gruppen. Instructions for Banking and Insurance, Construction and Real Estate operations, and Retail & Pharmacy can be found in ICA Gruppen’s sector-specific Instructions.

2 Sustainability Guideline

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 of 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 shall be safe and functional as well as be 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 by 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 included in the Group's agreements with all suppliers. ICA's suppliers of services and products are expected to meet

the requirements set out 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 pollution, water, ecosystems and biodiversity, resource use, 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 Pollution

ICA Gruppen seeks to limit the use of harmful substances into the air, water, and soil, in the products sold and in their production.

2.4.2 Water

ICA Gruppen seeks to use water efficiently within our operations and promote sustainable water management in our value chains.

2.4.3 Biodiversity and Ecosystems

ICA Gruppen seeks to increase responsible management of natural resources by promoting sustainable practices in agriculture, forestry, and fishing, including protection and restoration of biodiversity and combatting of deforestation.

2.4.4 Resource use

ICA Gruppen seeks to increase circularity and resource efficiency in our operations and value chains.

2.4.5 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.

2.4.6 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.

2.5 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 Implementation and Compliance

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 steering document.

The CEOs of the respective OpCos are responsible for implementation of and compliance with this guideline.

Managers are responsible for communicating and implementing these guidelines in their target groups. Enforcement and follow-up of acting in compliance is part of every manager's responsibility.

All ICA Personnel are responsible for familiarizing themselves with the contents of this guideline and acting in accordance therewith, thereby contributing to ICA Gruppen's ambition to be a leader in corporate responsibility. ICA Personnel shall be aware of applicable sustainability requirements and shall apply these within their respective product and business areas. ICA Gruppen's ambition is to at all times involve all ICA Personnel in the sustainability work, keeping them informed and providing ongoing training.

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

4 Guidance and Reporting

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

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

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

5 Updates and Reviews

This document shall be reviewed and updated annually or as needed based on the recommendations of Chief Corporate Responsibility Officer.

Document Information

Document Holder (name and title)	Kerstin Lindvall, Chief Corporate Responsibility Officer
Related Documents	Code of Conduct Governance of Steering Document Policy Sustainability Policy Process Due Diligence ICA Gruppen (instruktion) ICA Banken instruktion för hållbarhetsarbete ICA Fastigheter hållbarhetsriktlinjer (instruktion) AI Policy

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
2025:1	Amendments in line with harmonizing all steering documents with new format. Sections Document Information and Versions moved to the end of the document. Section Distribution, Implementation and Confirmation have been removed. This information is found in Governance of Steering Documents Policy, as well as included herein in sections 3 and 4. Included the subtopics of pollution, water, biodiversity and ecosystems and resource use within the area of environment (section 2.3). New headlines sections 3 and 4, including amendments harmonizing all steering documents.