

Sparc Group Code of Conduct



Acquirer in the installation industry

Sparc Group AB is an entrepreneur-driven group that coordinates and acquires companies in the installation industry. Since the start in 2021, it has acquired over 80 companies in plumbing, electricity, networks, projects and security. With over 1,000 employees, they work today from Malmö in the south to Örnsköldsvik in the north, with headquarters in Gothenburg. Growth takes place based on a common driving force of constant forward movement, where people's well-being and development methods are in focus. The vision is to create Sweden's most sustainable with a big heart workplace in the installation industry.

A compass in our daily work

Through Sparc Group, we bring installation companies together and invest in people who share our values – who believe in the idea of creating Sweden’s most attractive workplace and the installation industry’s most comprehensive offerings, through collaboration, synergy, and constant forward momentum.

Our vision is to become the installation industry’s most sustainable workplace. Our employees are the foundation of our sustainability work. Our customer offerings are both the core of our business and our greatest contribution to sustainability efforts. Through solutions, services, and products, we are contributing to a green transition in accordance with the global goals.

Our Code of Conduct serves as an ethical compass in our daily work. Our ethical rules and sustainable principles guide our operations and our relationships with each other, our customers and suppliers, and other business partners. We should all be role models and take care of and support each other. As an industry leader, this is particularly important and a crucial factor for the group’s long-term success. With the Code of Conduct, we ensure a professional approach to our entrepreneurship, supported by our group-wide policies and guidelines.

Our core values

Our conduct, actions and decision-making are responsible and always grounded in our core values.

Innovation – We have a unique view of each assignment. We do it our way, we do it right, and we do it with a focus on constant forward momentum.

Joy – With humour and the right attitude, we create joy on the job. By sparking joy, we create an attractive and welcoming workplace.

Together – Just like a big family, we’re always there for each other. Together, we’re greater than the sum of our parts.

Sustainable – We strive to run a sustainable business and take responsibility for our fellow human beings and the world around us.

Trust – We believe in each other and in each other’s skills. By trusting everyone to do what they do best, we grow both as a company and as individuals.

Who is subject to Sparc Group’s Code of Conduct?

Our Code of Conduct applies to all employees within Sparc Group, as well as all suppliers who enter into agreements with us. The Code of Conduct clarifies our expectations of ourselves and of you as a supplier, with the aim of contributing to an ethical, social, and environmentally sustainable business and industry. Together, we strive to maintain sustainable forward momentum driven by responsible entrepreneurship.

In this context, the word “supplier” refers to the organisations that provide us with products, services or personnel. This includes subcontractors, consultants, intermediaries, or other business partners.

The supplier is responsible for ensuring compliance with the requirements set out in the Code of Conduct, both within its own operations and in the supply chain.

Our Code of Conduct does not apply to individual transactions outside of agreements signed by Sparc Group, such as taxi rides and restaurant meals. Our Code of Conduct is supported and supplemented by associated policies and guidelines.



Erik Björklund
CEO Sparc Group





Our fundamental principles

- The Code of Conduct sets out minimum requirements. In addition to these, we comply with all applicable laws, regulations and rules relevant to the business we conduct and the places where we operate.
- We build our business on good corporate governance and excellent business acumen.

Our Code of Conduct is compatible with:

- The International Labour Organisation's (ILO) Eight Core Conventions, Nos. 29, 87, 98, 100, 105, 111, 138 and 182.
- The UN Convention on the Rights of the Child, Article 32.
- The UN's Universal Declaration of Human Rights.
- The occupational health and safety legislation in force in the respective country of manufacture, as well as the labour legislation (including legislation regarding minimum wages) and social security coverage in force in the respective country of manufacture.



Business ethics

We take responsibility for our business ethics

We combat bribery and corruption

- We reject all forms of bribery and corruption. We must therefore never (directly or indirectly) receive, solicit, offer, or give bribes or any other form of improper reward or benefit. Bribery or improper rewards or benefits include, for example, travel, gifts, entertainment, compensation, services, unauthorised commissions, or other benefits that may influence, or give the impression of influencing our own business decisions or those of our customers and other business partners.
- Our business is characterised by stringent business ethics, good business practice, and a sense of responsibility. We live up to the contracts and agreements to which we are a party. Our marketing and interactions with customers and other stakeholders should be honest and avoid unrealistic promises.
- Our actions and decisions are never self-serving, nor do we exploit business relationships for our own benefit or that of our loved ones.
- We do not misappropriate any tangible or intellectual property from Sparc Group or other companies.
- Reports, supporting documentation, documents and invoices are accurate, complete and not misleading.
- All sponsorship shall be characterised by transparency, be carried out with Sparc Group's best interests in mind, and be anchored in Sparc Group's core values.

We avoid conflicts of interest

- We avoid situations that could create or give the impression of creating a conflict of interest, regardless of the potential for personal gain.
- We do not allow cartelisation, price collusion, abuse of market dominance, or other illegal collaborations. We avoid any form of conflict of interest that could undermine or call into question the credibility of Sparc Group.
- We do not take any political position and do not participate in any initiatives that can be considered to take political positions. We provide no financial support to political parties.

We believe in healthy competition

- We comply with competition law and strive for healthy competition in, e.g., tenders, quotations, procurements, and purchasing.
- We follow established payment procedures that aim to be fair and prevent late payments.

We fight financial crime

- We keep accurate accounting of financial transactions and distance ourselves from all forms of financial crime, undeclared work, and the influence of illegal activities.
- We make sure to earn all our revenue in an ethically defensible and legal manner. We carry out transactions with regard for applicable rules on the prohibition and prevention of money laundering. Among other things, this means that we are always very familiar with the parties with which we do business.





Employees

We take responsibility for our employees

We take responsibility for ensuring a good and safe work environment

- The work environment of our business must be such that we do not suffer from ill health or injury as a result of our work. We always take all feasible measures to prevent occupational injuries, accidents, and ill health.
- We work systematically and in collaboration to create a physically, mentally, and socially safe and healthy workplace, where risks of occupational injuries, accidents and ill health are prevented and professional and personal development are encouraged.
- To create a good work environment in which employees feel engaged and happy at work, Sparc Group must have competent and exemplary leaders and offer opportunities for skills development within the context of, i.e. Sparc Academy.
- Sparc Group's workplaces must always be alcohol- and drug-free. It is thus unacceptable for employees to be under the influence of alcohol or drugs during working hours.

We believe in diversity and the equal value of all people

- We respect the equal value of all human beings and never allow discrimination or victimisation. No one may be discriminated against on the basis of their skin colour, sex, age, political opinion, religion, ethnicity, national origin, sexual orientation, illness, disability, trade union membership, or on the basis of other personal characteristics, ILO Nos. 100 and 111.
- We maintain a safe work environment that respects all employees and provide all employees with equal opportunities based on their skills, experience and performance, regardless of skin colour, gender, age, political opinion, religion, ethnicity, national origin, sexual orientation, illness, disability, and/or trade union membership.

- Our operations shall be characterised by an inclusive and open culture in which employees' abilities, experiences, and perspectives contribute to social diversity and equality.
- We strive to promote the well-being and participation of all our employees. We take a democratic approach to our governance that respects dissent and gives employees the opportunity to exercise influence.

We believe in fair working conditions for all

- We respect human rights, as enshrined in the UN's Universal Declaration of Human Rights. Human rights are rights that belong to all people regardless of gender, nationality, ethnic origin, language, religion, or other status. Human rights are universal, indivisible, and interdependent.
- We offer working conditions (e.g. working hours, wages and benefits in accordance with the applicable framework.
- We do not accept any form of child labour. For young workers under the age of 18 (and no younger than 15 years of age), special rules shall be applied with great consideration for the young person's health, safety and development.
- We do not accept any form of forced labour or human trafficking. Forced labour under paragraphs 29 and 105 of the ILO Convention, i.e. work carried out involuntarily and under duress, is universally recognised as a criminal offence and must not occur.
- We never restrict the freedom of any employee, for example by requiring the handover of identity documents such as passports or work permits.
- We respect each employee's right to freedom of association and with it, for example, the right to organise in trade unions and engage in collective bargaining, or to refrain from doing so.



Environment

We take responsibility for the environment

We prevent and reduce our negative impact

- We work actively and consciously to reduce and prevent the negative impact of our business on the environment.
- We make the most of our collective commitment, competence and development, and our innovations drive positive change wherever we live and work.
- We collaborate with our customers, suppliers and industry actors to contribute to a common green transition.

We are resource-efficient

- We strive to achieve resource-efficient and circular flows.

We make conscious product choices

- We must have good knowledge of the effect the Supplier's product, service, and activity on the environment. The Supplier must have procedures in place to reduce its energy and resource consumption, as well as waste and emissions into the soil, air, and water. Chemicals must be handled in a way that is safe for humans and the environment. The Supplier must comply with local and national environmental legislation.

We protect information

- We care about the privacy of each individual and therefore process, register, compare, and store personal data such as names, personal identity numbers, photos, and healthcare information in accordance with applicable laws and regulations, such as data protection legislation.
- We treat all information about Sparc Group’s prices and terms as strictly confidential.
- We respect and protect the intellectual property rights of third parties and protect confidential information by securing it against misuse, theft, fraud, and improper disclosure.
- We are obligated to keep confidential all information about the facilities, systems and conditions applied to each object at each customer’s site. All parts of upcoming, ongoing, or completed work are subject to complete confidentiality, with the exception of what needs to be reported to ensure compliance with Swedish law. This duty of confidentiality shall not prevent the Supplier from disclosing confidential information to the Supplier’s personnel and subcontractors engaged by the Supplier, provided that they are covered by a corresponding confidentiality agreement.

Compliance, follow-up, and measures

As a Sparc Group employee or supplier, you undertake to comply with and act in accordance with the principles of this Code of Conduct. Each employee has a personal responsibility for their actions. Repeated or serious violations of the Code of Conduct shall lead to corrective measures that may include termination of employment or of the business partnership.

When our supplier evaluation is conducted, Sparc Group’s suppliers must have a Code of Conduct accepted by Sparc Group, the principles of which at least correspond to those of Sparc Group’s Code of Conduct. Sparc Group reserves the right to audit its suppliers.

Whistleblowing

In the event of suspicion of something that is in serious violation of Sparc Group’s Code of Conduct and/or applicable legislation, Sparc Group, our suppliers, and our employees must immediately report these violations. Such reports are to be filed via Sparc Group’s whistleblower function. Sparc Group is responsible for the confidential handling and investigation of the reports and for subsequently taking appropriate measures.

No employee shall be subjected to or accept negative consequences as a result of having reported violations or suspected violations in good faith.

Sparc Group’s CEO is the document owner and, together with the board, ultimately responsible for the Code of Conduct. Respective Company Managers within the group are responsible for ensuring that their employees have information about the Code of Conduct and that internal training is carried out to increase understanding of the issues regulated in the Code of Conduct. It is the responsibility of each company manager to ensure that the Code of Conduct is complied with within his company activities and area of responsibility.

Sparc Group’s Code of Conduct shall be revised as necessary and determined annually by the board.

THE VISION

With a big heart, create
Sweden's most sustainable workplace
in the installation industry.