

# Supplier Code of Conduct

2022-01-26

# About the Code of Conduct

## Introduction

Hemnet Group AB (publ)'s and its subsidiaries' ("Hemnet" or the "Company") operations adhere to clear principles of lawfulness, ethics and morals – and it is important for Hemnet that these principles are respected by our suppliers as well. This Code of Conduct for Suppliers (the "Code of Conduct") has been adopted by Hemnet to ensure that the principles we ourselves adhere to are also clear to our suppliers. The Code of Conduct describes our expectations in relation to human rights, working conditions, the environment and sound business principles.

The Code of Conduct is based on the principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights. These international guidelines serve as inspiration for both the structure and design.

The Code of Conduct has been adopted by Hemnet's Board of Directors.

## Applicability

The Code of Conduct applies to all Hemnet's supplier relations, and thus also includes the supplier's subcontractors, employees and consultants, and is to be applied in all the supplier's operations, including manufacturing, delivery, sales and support. Suppliers are thus expected to adhere to the Code of Conduct in all parts of their business – including within the framework of purchasing and procurement of goods and services.

## Monitoring of compliance

Hemnet reserves the right to undertake follow-ups and audits regarding compliance with the Code of Conduct. Failures in compliance with the Code of Conduct are treated as breaches of the business agreements that are in force between Hemnet and the supplier at any given time.

The Code of Conduct may be updated over time and suppliers to Hemnet shall keep themselves updated on the Code of Conduct as updated from time to time. The Code of Conduct will be available on the Company's website [www.hemnetgroup.se](http://www.hemnetgroup.se) where updates will also be posted.

## **Reporting channels and contact regarding the Code of Conduct**

Hemnet encourages all suppliers to ensure an adequate internal system for dealing with violations of the law and the principles set out in this Code of Conduct. As a starting point, it shall be possible to submit complaints anonymously and without fear of reprisal.

Compliance issues identified by the supplier shall be reported to Hemnet's Head of Legal, who also handles other issues related to the Code of Conduct. Contact details are available on the Company's website [www.hemnetgroup.se](http://www.hemnetgroup.se).

In addition, severe misconduct may be reported anonymously via Hemnet's whistleblowing system that can be found here: <https://report.whistleb.com/sv/hemnet>

# **Human rights**

## **The UN Universal Declaration of Human Rights**

The supplier and its employees shall respect the internationally recognised human rights as described in the UN Universal Declaration of Human Rights. The business must be conducted with respect for the human rights of all individuals.

## **Diversity, equality and non-discrimination**

At Hemnet, we believe in equal rights and opportunity for everyone. We put great value on competence, experience and performance and believe that all employees should have the right to be judged according to objective criteria. We believe that successful teams are improved by diversity within the group. Suppliers are expected to share our approach to diversity, equality and nondiscrimination and have zero tolerance against all forms of discrimination, racism and sexism.

# Working conditions

## **Safe and secure working environment**

Suppliers to Hemnet are expected to continuously work in a structured way to ensure a safe and secure work environment for their employees.

Furthermore, we expect our suppliers to have zero tolerance for bullying, persecution and harassment.

## **Freedom of association**

All employees must have the right to form, join or choose not to join trade unions. Hemnet expects the supplier through its management to have an open dialogue about working conditions, where employees and/or its representatives can raise complaints without fear of reprisal.

## **Child labour and forced labour**

Hemnet does not accept any form of forced labour or child labour within the framework of activities that are under the supplier's influence. In particular, the rights of children must always be protected, and it is the responsibility of the supplier to ensure that children are protected with relevant measures within the framework of the supplier's business activities.

## **Labour laws**

The supplier shall comply with labour laws in the jurisdictions in which the supplier operates and respect minimum wages and regulations relating to the number of hours worked. All employees shall be entitled to sufficient time for recovery between work shifts. Minimum wages should be reasonable in relation to the cost of living. Wages must be paid directly to the employees, with regularity, on time and in full.

# Environment

## **Minimum impact on the environment**

At Hemnet, we constantly strive to make as environmentally friendly choices as possible, both in our daily work but also from a more long-term perspective. The starting point is that the business should have the least possible negative impact on the environment in order to contribute to a sustainable development. This means that we also require from our suppliers that they contribute to meeting our ambition, through structured environmental efforts and by striving to reduce their negative environmental impact and to use the most environmentally friendly technologies.

## **Reduced carbon footprint**

In order to reduce carbon dioxide emissions over the long term, as far as reasonable and possible suppliers should choose the most environmentally friendly mode of transport for deliveries and transportation that take place within the framework of the contractual relationship with Hemnet. For work-related journeys, environmental aspects must be taken into account when choosing the mode of transport. The supplier should strive to use energy from renewable sources and is expected to work actively with its total energy use, for example by working as much digitally as possible, such as only printing documents when necessary.

## **Waste**

The supplier is expected to, as far as reasonable and possible, work actively on sorting waste and recycling. Waste must be handled in accordance with applicable regulations, and with respect for the environment.

# Business principles

## Sound business principles

Hemnet's suppliers are expected to comply with all applicable laws and regulations in all locations where they operate. In addition to complying with all applicable legal and statutory requirements, suppliers are also expected to act in accordance with good business ethics and the business principles described below.

## Bribery, fraud and anti-corruption

Hemnet does not tolerate any kind of bribery or fraud and constantly strives to counter all forms of bribery, fraud and corruption within the company and in connection with the business. Failure to comply with laws and regulations against fraud can have very serious consequences and the supplier must have adequate procedures to ensure their own compliance. The supplier understands that all forms of corruption are unacceptable to Hemnet.

A benefit or gift offered to an employee by a supplier is typically not allowable if it affects or risks affecting the employee's objectivity and ability to make commercially sound decisions.

Suppliers shall under no circumstances offer such benefits or gifts to employees of Hemnet and should pay particular attention to the following:

- Do not give gifts that, based on time and value, are intended to influence a decision (e.g. supplier selection).
- Benefits and gifts must be provided with openness and transparency.
- Ensure that there is a clear connection with the recipient's work or assignment and the benefit/gift.
- Do not give unusually large discounts in connection with private purchases.
- Do not offer pleasure trips or holiday trips that have no serious business connection to the employment or the assignment.
- Do not submit offers for private use without market compensation of, for example, holiday homes, boats, cars or other similar items.
- Never use gifts as a means of influencing an individual's decision to the supplier's favour.

## **Conflicts of interest**

Suppliers should avoid conflicts of interest that may affect Hemnet's credibility or stakeholders' trust in Hemnet.

In a situation that potentially involves a conflict of interest, the supplier is expected to act transparently and responsibly towards Hemnet.

## **Competition**

Hemnet welcomes competition and conducts its operations in accordance with applicable Swedish competition laws, which is intended to ensure an open and fair market with competition on equal terms among market players, to the benefit of consumers.

The Supplier shall respect and comply with applicable competition laws and shall not enter into business agreements or take any measures with the purpose or effect of restricting competition.

# **Management of confidential information and data protection**

## **Management of Hemnet's confidential information**

Hemnet's information assets are protected regarding confidentiality, accuracy and accessibility in accordance with the classification assigned to the information. The supplier shall take relevant protective measures with Hemnet's confidential information and ensure that such information is only used within the framework of the delivery that is made to Hemnet. Employees at the supplier shall be bound by confidentiality and the supplier shall ensure that access to Hemnet's confidential information is only given to those employees who need it in order to fulfil the agreement with Hemnet.

## **Rights to privacy and private communication**

Employees' right to personal privacy must be taken into account by the supplier, and relevant measures to meet the requirements of applicable data protection legislation must be implemented by the supplier.



## Confirmation

We hereby confirm that we have read the Code of Conduct. We understand and accept that we have an obligation to meet the principles and requirements set out in the Code of Conduct, and to inform relevant employees and, where applicable, subcontractors, of the content of the Code of Conduct.

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Company name

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Date

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Signature

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Printed name