

Code of Conduct

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Word from the CEO

Hemnet has been on the market for over 20 years and with its over 62,5 million monthly visits, Hemnet has staked a clear position as Sweden's largest property portal; a large proportion of the country's home sellers and buyers turn to Hemnet when they buy or sell their home. Hemnet plays a role in hundreds of thousands of property transactions annually which, for many people, is the most important business transaction of their lives. With this comes a responsibility that we take very seriously.

We conduct our business based on principles of ethics and responsibility that are reflected in every part of our business. Hemnet is a reliable classifieds platform that only market property brokered by registered agents. Thus, we also provide a safe advertising space for our commercial advertisers who want exposure on Hemnet to reach their target audiences.

We who work at Hemnet must strive together to achieve our vision – to be the key to your property journey. We want to contribute to an effective, mobile and transparent housing market. To achieve this, the efforts from our employees are incredibly important. Hemnet should be a place to flourish, a safe and inclusive workplace, where we take care of our employees, and where there is zero tolerance for all forms of harassment and abusive behaviour. Hemnet actively strives to provide a good working environment, and together we create a workplace where employees are happy.

All of us working at Hemnet should strive to build a company that makes a positive impression on the market and in society. A company to be proud of! This is why it is important that we have clear rules and procedures for how we act as employees and as a company. This Code of Conduct contains these rules pertaining to ethics, social and environmental responsibility and should be understood as a guide in our daily work.

Cecilia Beck-Friis

Cecilia Beck-Friis
CEO Hemnet AB

About the Code of Conduct

Purpose of the Code of Conduct

Hemnet's Code of Conduct ("**the Code of Conduct**") serves as a guide for our entire business and should be used as a tool in our daily operations, both in terms of how we relate to each other as colleagues as well as in relation to external stakeholders. It clarifies the principles that govern the company and its employees in relation to customers, suppliers and society at large.

The Code of Conduct includes employees of all companies owned or controlled by Hemnet. 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 have been used as inspiration in both its structure and design.

The Code of Conduct has been adopted by Hemnet's Board of Directors and is subject to review annually in order to ensure that it is adjusted to both the demands and expectations of the outside world as well as the development of our own organisation and business operations. The Code of Conduct should be updated as needed.

The Code of Conduct's connection to other governance documents

Some sections of the Code of Conduct refer to more detailed information in Hemnet's internal steering documents. The purpose of such referrals is to make it easier for company employees to access more detailed information and instructions on various areas that are affected by the Code of Conduct.

Hemnet's responsibilities

Hemnet is responsible for providing employees with the guidelines and tools necessary to ensure that we apply laws, ethics and morals in a relevant way in our everyday lives.

As part of Hemnet's corporate governance, there must be relevant steering documents and competence available when an employee needs advice. It is also Hemnet's responsibility to foster a culture of openness, and to clarify proper reporting channels to highlight violations of the Code of Conduct. No one should be subjected to reprisals of any kind for having called attention to potential violations, and such matters should be handled professionally with great respect for all involved.

Ultimately, it is Hemnet's responsibility to ensure that our workplace is safe and secure, and that we as a company take responsibility for the environmental impact of our operations.

Employee's responsibilities

Each employee is responsible for taking note of and following the Code of Conduct, and the steering documents that lay out in detail what we should do at any given time and how we should conduct ourselves to meet the requirements placed on our business.

Everyone is expected to contribute to compliance by reporting to superiors their concerns or potential violations, taking responsibility on their own part by asking questions in the event of uncertainty.

Management's responsibilities

Managers should also guide their employees in terms of behaviour and act as good role models. Managers are expected to uphold the Code of Conduct in day-to-day operations, and to foster openness where compliance with laws and rules, ethics and morals are natural parts of the culture.

It is your responsibility as a manager to ensure that new employees receive the Code of Conduct and related governance documents as part of the introduction and on-boarding.

Human rights

Hemnet and its employees respect the internationally recognised human rights as described in the UN Universal Declaration on Human Rights. We conduct our business with respect for the human rights of all individuals, and we expect the same from our suppliers.

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 personal development and to be judged according to objective criteria. We believe that successful teams are improved by diversity within the group.

We understand, respect and value each other's differences and have zero tolerance for all forms of discrimination, racism and sexism.

Safe and secure working environment

We work continuously to ensure the best possible physical working environment for our employees. This is not only the case at the office; we also have routines in place in relation to how we contribute to ergonomic home-offices for our employees. To promote the psychosocial work environment, we work proactively with health and stress management. We encourage our employees to take care of their health and well-being through different joint initiatives consisting of both physical and social activities and gatherings. We strive to ensure that all employees are happy with their work and have a good balance between their work and private lives.

At Hemnet, we treat each other with respect. Hemnet has zero tolerance for bullying, persecution and harassment, which is handled in the company's ***Action Plan for Dealing with Abusive Behaviour and Discrimination***. We continuously follow-up on working environment aspects in our employee surveys, and train our managers in working environment matters.

Right to privacy and private communication

Data is a key asset for Hemnet, and in our business we collect and process large amounts of data that can be directly or indirectly linked to an individual. All use of such information (personal data) shall be handled with respect for personal privacy and in accordance with applicable data protection legislation.

We all have a responsibility to ensure that the following basic principles are respected, as described in more detail in Hemnet's *Policy for Data and Information*.

- Our personal data processing is transparent and is carried out on adequate legal basis.
- We use personal data for specific and limited purposes.
- As we develop our business or make changes to how we handle data, we ensure that any change is handled properly with help from Legal.
- We only collect such personal data as is necessary for the stated purpose and do not store it for longer than is justified for that purpose.
- We do not share personal data with suppliers unless they have entered into a so-called Data Processor Agreement with us.
- We follow applicable information security guidelines e.g. in relation to Slack, e-mail and other tools, to ensure that personal data is processed in a controlled context and that it is protected by relevant security measures.

Suppliers and partners

Hemnet as a company requires all suppliers to conduct their business responsibly and in a manner compatible with the law and our values. For us at Hemnet, it is important that our supply chain does not act in a way that goes against the principles of this Code of Conduct. To that end, we have developed a Supplier Code of Conduct which we expect our suppliers and partners to follow even if it dictates a higher standard than is required by national laws or regulations, that is part of our contract routine for all negotiated agreements.

Hemnet's *Supplier Code of Conduct* applies to all of the supplier's operations, including manufacturing, delivery, sales and support.

Civic participation



Hemnet



**STOCKHOLMS
STADSMISSION**

Since June 2019, Hemnet has been a proud partner to the NGO Stockholm Stadsmission and its initiative Bobyrån – “the housing bureau.” Bobyrån is an activity within Stockholm Stadsmission that assists vulnerable people with the management of apartments, coordination and administration, and support with advice on housing with the help of a service team. The collaboration is an example of how Hemnet builds a culture where we as a company strive to do good in society. As an employee of Hemnet, you are encouraged to bring up initiatives that you see could make a difference, especially for those people who are outside the housing market.

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 lasting and sustainable development. Our environmental work is focused on the following areas, which are also described in the company's *Guidelines for Hemnet's Environmental Work*.

Transport and travel

Over the long term, in order to reduce carbon dioxide emissions per employee, the company chooses the most advantageous mode of transport from an environmental point of view for deliveries to and from the office, as much as possible. For work-related journeys, employees choose the most appropriate mode of transport for the trip and in addition to cost, time and safety aspects, in particular should consider environmental aspects in their decisions. In Hemnet's *Instructions for Work-Related Travel*, these issues are discussed in more detail.

Waste

At Hemnet, we actively strive to sort waste and currently have, in addition to household waste, sorting for corrugated cardboard, glass, plastic, metal, incandescent lamps, deposit returns and electrical scrap for recycling. Each employee contributes by observing the recycling opportunities on offer.

Energy use

Hemnet uses eco-labelled electricity for its office premises and all tenants in the building are connected to a green electricity agreement. We take joint responsibility for our total energy use, and each employee contributes by being aware of their own use of electricity in connection with the job and by striving for a completely digital way of working, for example only printing documents when absolutely necessary.

Suppliers

Hemnet chooses goods and services with low environmental impact as much as possible. Relevant environmental aspects are considered when purchasing and contracting for goods and services.

As a company, Hemnet requires external suppliers to consciously work to minimise environmental impact. This is also stated in Hemnet's *Supplier Code of Conduct*.

Bribery, fraud and anti-corruption

Hemnet's employees are subject in different ways to influence from others, and in turn they can have an impact on others through, for example, marketing, relationship-creating activities, etc. This is a natural part of entrepreneurship and how long-term relationships are created and maintained. On the other hand, it is of the utmost importance that these types of processes are formally correct and that there are clear guidelines for what this should look like to ensure it is not inappropriate.

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. Failure to comply with laws and regulations against fraud can have very serious consequences for Hemnet and for the individuals concerned. Hemnet employees therefore must be very careful to always make credible judgement calls and should never end up in a position that may violate the company's internal guidelines regarding bribery and fraud. A benefit or advantage offered to an employee by an external person is typically inappropriate if it affects or risks affecting the employee's objectivity and ability to make smart business decisions.

Internal guidelines on bribery and fraud

Bribery is when a person offers or gives (or asks for, accepts or receives) something of value for the purpose of affecting a business or decision in an inappropriate way.

A typical example of a bribe is when a supplier offers money or other form of compensation to an employee of a company with the intention of getting business from that company. Another typical example is to offer gifts or entertainment to an employee with the intention of unduly influencing him or her to take a specific action. A bribe or inappropriate benefit can look and behave in different ways and can also involve paid costs, loans, discounts, personal benefits, accommodation, support for a campaign or something that can be considered of value to a person or organisation.

What can be classified as "inappropriate" varies, depending on the circumstances. The situation should be assessed from a comprehensive perspective, and factors such as the size of the benefit, the relationship between the parties involved, the frequency of gifts or the service and whether it can be delivered in a transparent manner should be considered.

However, as a company and employee of Hemnet, we should act in accordance with the following guidelines:

- We accept gifts from external parties with caution and always assess the situation from a comprehensive perspective. We do not accept gifts that, based on time and value, are intended to influence a decision (such as supplier selection). We apply the same principles when we give away gifts or benefits ourselves.
- We only accept benefits and gifts that are provided with openness and transparency and apply the same principle when it comes to gifts from Hemnet.
- We only accept and give benefits and gifts where there is a clear connection with the recipient's work or assignment.
- We do not accept unusually large discounts in connection with private purchases.
- We do not accept pleasure trips or holiday trips and events that have no serious business connection to the employment or the assignment.
- We do not accept offers for private use without market compensation of, for example, holidayhomes, boats, cars or other similar items.
- We never use gifts as a means of influencing an individual's decision in Hemnet's favour.

Creating good relationships with our customers and partners is a vital and important part of our business. This includes activities to foster customer relations, such as summer and Christmas gifts, lunches, customer events and such. When we give away something, however, we always do so with clear consideration of whether it is appropriate based on the value and timing.

When in doubt - always contact your supervisor or Hemnet's Head of Legal.

AML (Anti Money laundering)

Hemnet's core business is targeted at sellers who are to sell their real estates via a registered real estate agent. Within the framework of the agents' statutory obligations, routines include applicable anti money laundering legislation and anti money laundering regulations. This means that Hemnet's primary customer group is subject to sound routines in order to counteract money laundering. Against this background, Hemnet has not implemented its own anti money laundering procedures.

Conflicts of interest

A conflict of interest arises when your personal relationships, participation in external activities or interest in other business activities can be perceived as affecting your behaviour as an employee of Hemnet.

You are expected to be open about potential and actual conflicts of interest – and to notify your manager of them. Make sure that you do not participate in situations where a conflict of interest can affect your judgment.

Competition

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

Competition law prohibits (i) contracts and agreements that intend to or may restrict competition, and (ii) exploitation of a dominant market position.

Implied agreements, e-mails and coordinated business behaviours etc. can also be considered as contracts and agreements.

As an employee, you are expected to know these basic principles of competition law, and to raise questions with your manager or with Hemnet's Head of Legal:

- Do not discuss agreements and contracts and do not enter into agreements that may restrict competition in the market. In particular, this refers to agreements relating to price, margins or business conditions and agreements that restrict or control access to the market, technological development or the supply chain.
- Be observant of the responsibility resulting from having a strong or dominant position in the market – a responsibility that must not be abused by, for example, unreasonable prices or contract terms, the application of different terms to business and transactions that are otherwise equal.

If you are uncertain about the application of these principles, you should consult with your manager or contact Hemnet's Head of Legal.

Information security and handling of confidential information

Hemnet's information assets must be protected with regard to confidentiality, integrity and availability in accordance with the classification assigned to each information asset. Protective measures must be designed in such a way that they have as little impact as possible on customers' and users' experience of Hemnet's services and employees' way of working. The goal should be availability 24 hours a day and maintaining confidentiality and integrity.

Employees' responsibilities

Each employee is responsible for following the rules and guidelines laid down by management and for promoting responsible use of Hemnet's IT resources and IT security in the form of both systems and data as well as clients and personal resources. All employees must also follow the guidelines that apply to accessing, storing and disseminating information according to the classification of each individual item of information.

We all have a responsibility to ensure that confidential information is not spread to unauthorised persons, either internally or externally. Confidential information is information that is not known to the public and that should not be known to the public. Examples of such information are business plans, budgets and information relating to transactions, business development, product development or company strategies.

- Everyone takes responsibility for the protection of Hemnet's confidential information.
- Ensure that confidential information is not shared in a manner that risks it being disclosed to or received by unauthorised persons.
- Never discuss confidential information in a public environment or talk on the telephone in a public environment about confidential information. A public environment can be on the street, in restaurants, on the subway, on an airplane or in the elevator, for example.

- Do not talk about confidential information privately either, such as at home or with friends.
- Be especially careful when using email as a means of communication to discuss or share confidential information. Always ensure that the recipients are authorised for access to the information, and to the extent that you share information externally, that the recipients are bound by confidentiality.
- If you change jobs, be aware that you still have an obligation not to disclose confidential information.
- If you are unsure whether or not information is confidential – consult your supervisor and treat the information as confidential until you have confirmed that it is public.
- Confidential information that is or may be so-called insider information must be handled with special care, in accordance with what is stated below.

Insider information

As a listed company, Hemnet is responsible for meeting stock market law and also the requirements set by the stock exchange regarding the handling of information that is likely to affect the market price and that has not been disclosed - such information may be so-called "insider information". As an employee of Hemnet, you may receive such information and you are obligated to familiarise yourself with and follow Hemnet's *Insider Policy*. Examples of such information may be information about the acquisition or divestment of part of the business, financial information or the conclusion of new agreements with a significant impact on Hemnet's business that has not yet been disclosed.

How Hemnet handles insider information as well as what requirements are placed on each person who shares and receives insider information, respectively, is regulated in Hemnet's *Insider Policy*. Among other things, these rules mean that it is prohibited by law for anyone with access to insider information to trade in the Company's shares. All listed companies must as a main rule disclose insider information immediately, which is usually done through a press release, and it is only when a press release has been published that the information is considered public. In certain cases the disclosure can be postponed, in which case you - if you have access to the information - will be included on a so-called insider list held by the Company, and informed about what this entails.

All employees must adhere to the following principles:

- We do not trade Hemnet shares when we have access to insider information.
- We do not share insider information with others unless it is strictly justified.
- We all take responsibility for evaluating whether the information we have access to may be insider information and for contacting the Head of Legal in case of any uncertainty.
- In cases where we have access to insider information, we follow Hemnet's procedures for insider lists and take due note of the information provided with regards to applicable rules in such situations.
- We act with caution if we are unsure whether information is insider information and treat it as insider information until we have confirmed that this is not the case.

More information and guidelines can be found in Hemnet's *Insider Policy*.

Suspected violations of the Code of Conduct

Hemnet promotes a culture of openness and accountability. We therefore expect you as an employee to act immediately if you believe a violation of the Code of Conduct or applicable law has taken place or will take place in the future. This is an important aspect of the sustainability of our culture.

What to do in the event of a possible violation

Each employee is asked to raise the issue with the person concerned in the matter in the first place where possible. If this is not suitable or possible, you should contact your supervisor first. If it is also not suitable or possible, you are asked to contact your supervisor's supervisor, Hemnet's HR manager or Hemnet's general counsel.

Hemnet's managers are responsible for encouraging an open dialogue and for supporting employees by addressing concerns without them having to worry about negative reactions or any sort of reprisal. Each case must be handled seriously, and as far as possible the identity of the persons concerned shall be kept confidential.

What should be reported:

- Violations of laws or regulations.
- Violations of the Code of Conduct.
- Failure to comply with the policies, guidelines and instructions that govern us in our operations.
- Other cases involving inappropriate, unethical or immoral behaviour that you believe are serious enough to report.

Hemnet must take relevant measures to investigate such reported infractions and violations that may lead to legal consequences.

In addition to the internal reporting channels, severe misconduct may be reported anonymously via Hemnet's whistleblowing system that can be found here: <https://report.whistleb.com/sv/hemnet>. Hemnet has relevant routines in place to ensure that whistleblowers are granted the protection that they are entitled to under law.

Questions

Do you need advice or help with questions related to the Code of Conduct?
Contact your supervisor or Hemnet's Head of Legal.