

Supplier Code of Conduct

2025-05-06

About the Code of Conduct

Introduction

At Hemnet, we conduct our business based on principles of ethics and responsibility that are reflected in every part of our business. Hemnet and its employees respect the internationally recognised human rights as described in the UN Universal Declaration on Human Rights and where we are guided by the [UN Guiding Principles on Human Rights in Business](#). We conduct our business with respect for the human rights of all individuals, and we expect the same from our suppliers. This Code of Conduct for Suppliers (the “Code of Conduct”) sets out our expectations on suppliers in terms of basic ethical and moral principles related to sustainability and human rights. Furthermore, suppliers are expected to take responsibility for the whole supply chain, by actively specifying requirements and following up on sub-contractors’ work with human rights, in particular in relation to sub-contractors’ human resources.

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

Reporting channels and contact regarding misconduct

Hemnet encourages all suppliers to establish an adequate internal system for dealing with violations of the law and other severe misconduct. As a starting point, it shall be possible to submit complaints anonymously and without fear of reprisal.

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 zero tolerance for all forms of discrimination, prejudice, and bias, including racism, sexism, and other harmful attitudes. By discrimination, we mean every form of negative treatment due to sex, gender identity, sexual orientation, ethnicity, nationality, culture, religious beliefs, political views, age, disability, and socioeconomic background.

Working conditions

Safe and secure working environment

The supplier's employees must not be exposed to serious risks to health and safety at work. Suppliers to Hemnet are expected to continuously work in a structured way to ensure a safe and secure work environment for their employees with a work environment that is clean, hygienic and well-maintained, with sufficient light, ventilation and, where necessary, heating.

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

Freedom of association

The supplier's employees must have the right to form, join or choose not to join trade unions, or participate in collective bargaining negotiations without fear of discrimination, violence or harassment, whether physical or psychological. 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 tolerate any form of forced labour or child labour within the framework of activities that are under the supplier's influence. Suppliers are responsible for safeguarding children's rights and ensuring their protection through appropriate measures within their business operations. It is the supplier's responsibility to establish and enforce policies that explicitly prohibit trafficking in human beings, forced or compulsory labour, and child labour. Suppliers must ensure these policies are effectively implemented and take measures to prevent violations within their supply chain.

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. Employees are not to be charged with any fees and costs related to recruitment, hiring and termination, and employees are not expected to leave deposits when they start a job. It is expected that the supplier's employees are informed of their rights.

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. Our long-term ambition is that our impact shall be climate neutral. This means that we are interested in working with suppliers that contribute to us meeting our ambition, through structured environmental efforts and by striving to reduce their negative environmental impact and to use the most environmentally friendly technologies. Hemnet encourages that the Company's suppliers have

concrete emission targets, by way of example by joining Science Based Target Initiative (SBTi).

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.

Privacy, data protection and confidentiality

Management of Hemnet's confidential information

Hemnet's information assets are protected regarding confidentiality, accuracy and accessibility. 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 fulfill the agreement with Hemnet.

Rights to privacy and private communication

Individuals' right to privacy shall be taken into account by the supplier, and relevant measures to meet the requirements of applicable data protection legislation shall be implemented by the supplier. This applies both to personal data processed within the framework of the agreement with Hemnet, and otherwise in the supplier's operations.

Processing of personal data on behalf of Hemnet

If the supplier processes personal data on behalf of Hemnet, a data processing agreement must be in place in accordance with applicable data protection legislation. The supplier shall not transfer personal data outside the EU/EEA unless this is permitted under the data processing agreement with Hemnet and the supplier has ensured an adequate level of protection through approved transfer mechanisms, such as based on an adequacy decision from the European Commission or through standard contractual clauses or other approved transfer mechanisms in accordance with Chapter V of the GDPR.

Governance

Roles and Responsibilities

This Supplier Code of Conduct is owned by the General Counsel, with any updates or amendments requiring approval from the Board of Directors. Management and the Board of Directors are responsible for ensuring compliance with this Supplier Code of Conduct.

Follow-up and compliance

Monitoring and Review

This Supplier Code of Conduct undergoes an annual review in accordance with Guidelines for Hemnet's Steering Document and the Policy for Corporate Governance, to ensure its proper implementation and continued relevance to Hemnet's operational needs. During the review, it is assessed for effectiveness in addressing current risks and compliance requirements.

The review process is conducted by the General Counsel, in accordance with Hemnet's Policy for Corporate Governance. The General Counsel ensures the Supplier Code of Conduct remains aligned with regulatory changes, evolving business needs, and ensures compliance through appropriate supporting documents and training. The results of the review process, including any necessary updates, are reported to the Board of Directors for final approval.

Policy Accessibility

This Supplier Code of Conduct is accessible to all employees and relevant stakeholders through internal communication platforms and Hemnet's corporate website at <https://www.hemnetgroup.se/>.