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CEO	Anna Forsebäck	2024-03-15	Policy	
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Policy for Corporate Governance

Information

What does this policy cover?

This Corporate Governance Policy (the "Policy") includes the internal regulations that apply to the corporate governance of the Hemnet Group AB (publ) and its subsidiary ("Hemnet" or the "Company").

Who is affected by this policy?

This Corporate Governance Policy affects all of Hemnet and its operations, including the parent company Hemnet Group AB (publ) and all its subsidiaries. The policy pertains to the overall steering documents, and Hemnet's other policies are subordinate to this policy.

Why have we created this policy?

This policy is designed to ensure good corporate governance, compliance with laws and regulations, and to ensure communication and compliance with Hemnet's values and desired business ethics. In addition to this policy, this is ensured through Hemnet's policy documents each time they are adopted. For a complete list, see the *Overview of Steering Documents*. The Company's policies are designed to create a foundation for good corporate governance, with the aim of aiding the Company in achieving the main objectives of the business, including sustainable profitability for the shareholders. The way in which the Group is governed is crucial for the development of the Group's value over time.

Content

Implementation and reporting

The Board of Directors shall ensure that the Company always follows good corporate governance.

The Board of Directors shall submit an annual report and a corporate governance report. If the Company does not fully follow the Swedish code for corporate governance (sv. svensk kod för bolagsstyrning), this should be explained in the corporate governance report.

Board of Directors' roles & responsibilities

The duties of the Board of Directors are set out in the Board's rules of procedure. In addition, the Board is responsible for documenting corporate governance principles through the following documents:

- The Board's rules of procedure, including the rules of procedure of the Audit Committee and the rules of procedure of the Remuneration Committee
- CEO instructions
- Instruction regarding financial reporting to the board

These documents form the basis for the governance of Hemnet. The core values and work processes of Hemnet are determined by the policies that have been adopted. All Hemnet's policies are to be adopted by the Board.

The CEO's role & responsibilities

The CEO is responsible for defining, maintaining and leading a proper organisation, which has the ability and capacity to achieve the company's vision and goals, in accordance with the CEO's instructions.

Steering documents

Hemnet's governing documents have a defined hierarchy, based on the following table:

Document type	Description	Document owner	Approved by
Policy	Management's intentions and guidelines. Compulsory. All departures and exceptions to be prepared by the Board of directors.	Responsible manager at senior executive level	The Board of Directors
Code of Conduct	Code of Conduct for all employees with a description of the principles that guide us in our daily work	General Counsel	The Board of Directors
Supplier Code of Conduct	Code of Conduct for Hemnet's Suppliers	General Counsel	The Board of Directors
Guidelines	Clarifies policy and explains what to do	Responsible manager at senior executive level or General Counsel	CEO
Routines/instructions	Explain how things should be done through concrete instructions	Responsible manager	Responsible manager at senior executive level or General Counsel

Policies and steering documents shall address at least the following areas:

- Corporate governance
- Communication
- Human resources
- Finances
- Information and data

For a complete list of all control documents, see [Overview of Steering Documents](#) .

The management of steering documents is generally done in accordance with the *Guidelines for Hemnet's Steering Documents*. Among other things, these guidelines state that:

- All policy and guideline documents are followed up and reviewed on an annual basis,
- That all control documents are approved according to the table above and revised when necessary, and
- That document owners are responsible for compliance and that action is taken in the event of violations being identified.

Compliance with the steering documents is the responsibility of every employee.

Violations in compliance with policies are reported to the General Counsel, and are reported by the CEO to the Audit Committee and the Board of Directors annually.

Business planning and follow up

On an annual basis, Hemnet will prepare a budget for the following year as well as a business plan that extends over a period of 3 years.

The budget and business plan shall be prepared in a standard format. Follow-up and reporting of outcome compared to budget shall be made monthly to the Board of Directors. The CEO is responsible for the reporting with the support of the CFO.

Financial reporting

Hemnet's routines and processes for financial reporting shall be documented in a *Financial handbook*. The Financial handbook should ensure that processes and procedures for financial statements and preparation of financial reporting are not dependent on specific personnel. The Financial handbook should be updated annually and approved by the Audit Committee.

Risk management and control

The Board of Directors shall ensure that the Company has relevant internal controls and risk management systems in place that are appropriate in relation to the scope and nature of the Company's operations. The purpose of these internal controls and risk management systems is to conduct the Company's operations in a manner that:

- Safeguards the financial interests of all shareholders,
- Ensures compliance with relevant laws and regulations applicable to the business, as well as
- Ensures that clear and accurate information can be provided to the Company's stakeholders in accordance with set schedules, not least in terms of financial reporting.

The Board shall ascertain that an annual review of the Company's most important risk areas and these risk areas' control routines are conducted. The CEO is responsible for documenting these risks in an overall risk analysis and that this is reported to the Audit Committee and the Board of Directors. This document should cover at least the following areas:

- Operational risks
- Strategic risks
- Legal risks
- Financial risks
- Sustainability risks

Detailed risk assessments must be updated annually, and internal controls must be designed and implemented to manage these risks. Controls must be designed in such a way that they are clear on what should be followed up on and that results for each control can be determined.

A self-evaluation of (i) the design of the controls, (ii) the performance of the controls and (iii) the results of the controls must be done annually and reported to the Audit Committee and the Board. The CFO is responsible for this process.

For further information, see the *Guidelines for Risk and Control*.

Crisis management

The Company must be prepared for crises of all kinds and must have relevant business continuity plans for this purpose. . The CEO is responsible for crisis management and shall consult the Chair if appropriate.

Reporting channels for compliance issues

Hemnet's Code of Conduct indicates which reporting channels are to be used by employees who detect violations in compliance with Hemnet's steering documents. Each employee is asked to raise compliance issues with the person concerned in the matter in the first place where possible. If it is not suitable or possible, the employee should contact the immediate supervisor. If that is also not suitable or possible, employees are asked to contact their supervisor's supervisor, Hemnet's Chief People & Culture Officer or Hemnet's General Counsel. Also, severe misconduct can be reported anonymously via the Company's whistleblower function available via <https://report.whistleb.com/en/hemnet>.

Violations of this policy

Violations of this policy will always be taken very seriously and may lead to disciplinary action, including dismissal. In addition, violation of relevant laws may mean that you (and/or the Company) are subject to legal sanctions.

Related documents

- Code of Conduct
- Code of Conduct for Suppliers
- Guidelines for Steering Documents
- Guidelines for Risk and Control
- Authorisation instructions
- Overview of Steering Documents
- Financial handbook
- Business continuity plans