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Insider Policy

Information

What does this Policy cover?

This policy (the “**Policy**”) sets out the framework that applies to employees and other persons with access to inside information regarding Hemnet Group AB (publ)’s (“**Hemnet**” or the “**Company**”) operations, as well as the specific rules that apply to persons discharging managerial responsibilities in the Company, so-called PDMRs. This Policy promotes a company culture that prioritises ethical conduct, transparency, and accountability in the handling of inside information.

Who does this Policy apply to?

All employees of the Company, as well as other persons who have or may gain access to inside information, shall take note of this Policy and comply with the rules herein as well as applicable legislation and regulations.

Why have we created this Policy?

The core objectives of this Policy are to specify the Company’s procedures for handling inside information and to describe the rules on trading prohibitions that apply to all persons holding inside information. The Policy further describes the rules for the reporting of certain transactions for persons discharging managerial responsibilities and persons closely associated with them, as well as the rules on so-called closed periods applicable to these executives.

Prohibition of insider trading and/or market manipulation

Insider regulations and applicable laws

Everyone who trades the Company’s shares or other financial instruments related to the Company must comply with Swedish and EU-adopted securities laws and regulations, such as the European Parliament and the Council’s Regulation (EU) No. 596/2014 on market abuse (“**MAR**”), including the amendments following from the European Parliament and the Council’s Regulation (EU) No. 2024/809 (the “**Listing Act**”), the Act with Supplementary Provisions to the EU Market Abuse Regulation (Sw. *lagen (2016:1306) med kompletterande bestämmelser till EU:s marknadsmissbruksförordning*), as well as the Act on Penalties for Market Abuse on the Securities Market (Sw. *lagen (2016:1307) om straff för marknadsmissbruk på värdepappersmarknaden*).

MAR contains provisions on prohibitions against insider trading, prohibitions against unlawful disclosure of inside information, and prohibitions against market manipulation, see below. Furthermore, MAR prescribes an obligation for persons discharging managerial responsibilities in the Company, as well as persons closely associated with them, to notify the Company and the Swedish Financial Supervisory Authority (the “**SFSA**”) (Sw. *Finansinspektionen*) of transactions in the Company’s shares and other financial instruments. For persons discharging managerial responsibilities, a special trading prohibition also applies as a general rule during 30 calendar days before the publication of a quarterly report or year-end report, see further below under the heading *Trading prohibition*.

This Policy is, for practical reasons, not exhaustive in relation to all applicable legal provisions. All employees of the Company shall be responsible for complying with the provisions of this Policy as well as applicable laws and regulations at any given time regarding inside information and securities trading.

Additional restrictions regarding the handling of information may follow from individual employment agreements or engagement agreements.

Definition of inside information

In this Policy, the term “inside information” shall have the meaning set out in MAR, which means that inside information is information of a precise nature that has not been made public, which directly or indirectly concerns one or more issuers or one or more financial instruments and which, if made public, would be likely to have a material impact on the price of those financial instruments or on the price of related financial derivative instruments.

Nasdaq Stockholm has issued a special guidance text to the Nasdaq Nordic Main Market Rulebook for Issuers of Shares (the “**Nasdaq Rulebook**”) which provides certain guidance on how the assessment of whether information constitutes inside information can be made. The guidance text also sets out the following examples of situations where inside information may exist:

- orders,
- investment decisions,
- cooperation agreements or other agreements of major importance,
- business acquisitions and divestitures,
- price or exchange rate changes,
- credit or customer losses,
- joint ventures,
- research and study results,
- legal disputes and government and court decisions,
- financial difficulties,
- liquidity provision agreements,

- information concerning subsidiaries and affiliated companies,
- audit report,
- change in financial results or financial position, and
- substantial changes to the issuer's operations.

The assessment of what constitutes inside information shall be made on a case-by-case basis. Decisions on whether information is to be considered inside information, and thus shall be disclosed as such pursuant to MAR and the Nasdaq Rulebook, shall be made by the Chief Executive Officer (CEO) in consultation with the General Counsel, and if possible and appropriate, also with the Chief Financial Officer (CFO). Each of the CEO, the General Counsel and the CFO shall individually have the authority to decide that information is to be considered inside information, if consultation is not possible or appropriate. The Chief Communications Officer (CCO) shall be informed immediately for the implementation of necessary communication measures. In the event that the CEO is not involved in the decision, the CEO shall also be informed before publication takes place. For further information, see the Company's *Communications Policy*.

In case of doubt as to whether certain information constitutes inside information, the Company shall seek external advice from a specialised legal adviser, or alternatively contact the surveillance department at Nasdaq Stockholm for guidance.

Prohibition against insider trading

A person who is in possession of inside information may not use such information by, for own or another person's account, directly or indirectly, acquiring or disposing of financial instruments to which the information relates. The prohibition applies regardless of whether the transaction takes place on or off the stock exchange, regardless of how the person obtained the inside information, and regardless of whether the person holds a managerial position or is included in the Company's insider list. It is furthermore prohibited to use inside information by cancelling or modifying a trading order relating to the financial instrument to which the information relates, if the trading order was placed before the person gained access to the inside information.

A person who is in possession of inside information may not recommend or induce any other person to engage in insider trading.

Handling of inside information and prohibition against unlawful disclosure

Hemnet shall as soon as possible disclose inside information that relates to the Company. This does not, however, apply to inside information relating to intermediate steps in a protracted process, where those steps are connected with bringing about or resulting in particular circumstances or a particular event. In such processes, as a general rule, only the final circumstances or the final event shall be disclosed as soon as possible after they have occurred. If the information instead relates to a final event or other inside information that is not to be disclosed immediately, the Company may, provided that certain specific conditions are met, delay the disclosure, see further Hemnet's *Communications Policy*.

A person who is in possession of inside information is prohibited from disclosing such information to any other person, unless the disclosure occurs as a normal part of the exercise of the person's employment, profession or duties, and it can be ensured that the recipient is bound by a duty of

confidentiality, either by law or by agreement. This prohibition also applies internally within the Company – a person who is employed by or is a consultant to the Company may not disclose inside information to another employee or consultant unless the recipient needs access to the information in order to fulfil their duties.

Each time inside information arises within the Company an assessment shall be made as to whether the information shall be disclosed as soon as possible, whether it relates to an intermediate step in a protracted process, or whether conditions exist for a decision on delayed disclosure in accordance with the Company's *Communications Policy*. When inside information arises, regardless of whether it relates to a one-off event or a protracted process, the Company is obliged to establish an insider list with information about the board members, employees, consultants and advisers who have access to the inside information, see further below under the heading *Insider list*. The occurrence of information that may constitute inside information shall be reported immediately to the Company's General Counsel, CEO, CFO or CCO. Inside information is to be regarded as confidential information in accordance with the guidelines for information classification in the Company's *Policy for Information and Data* and shall be handled with great care and in such a way that unauthorised persons do not gain access to the information. If inside information is provided to an employee or consultant, the person disclosing the inside information shall notify the recipient that the information constitutes inside information and that the recipient will, as a result, be included in the Company's insider list. The person who disclosed the information is obliged to provide the required information without delay to Hemnet's General Counsel, who is responsible for the Company's insider list.

If inside information is disclosed to external counterparties, such as major investors, lending banks or contractual counterparties, the Company shall ensure that the disclosure is made in accordance with MAR and that the recipient is informed that the information constitutes inside information and of the legal obligations arising therefrom. The Company shall furthermore ensure that the recipient is bound by a confidentiality agreement. The handling of such external counterparties in the Company's insider list shall be in accordance with what is set out below under the heading *Insider list*.

Prohibition on market manipulation

It is prohibited to engage in, or attempt to engage in, market manipulation. Market manipulation includes, among other things, entering into a transaction, placing an order to trade, or any other behaviour which gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of the Company's financial instruments, or which secures or is likely to secure the price of one or more of the Company's financial instruments at an abnormal or artificial level, unless such transaction, order or behaviour has been carried out for legitimate reasons and conforms with an accepted market practice. Market manipulation also includes disseminating information through the media or by any other means, which gives, or is likely to give, false or misleading signals, as well as the transmission of false or misleading data or input in relation to a benchmark.

Insider list

In accordance with Article 18 of MAR, the Company is obliged to draw up and continuously update a list of all persons who have access to inside information and who are working for the Company under a contract of employment, or otherwise performing tasks through which they have access to inside information (a so-called insider list). The Company's General Counsel is responsible for establishing and maintaining the insider list in each case of inside information and where a decision has been made on delay of disclosure. The Company's General Counsel shall also ensure that an insider list is established and updated for inside information relating to a protracted process where intermediate

steps are not disclosed immediately. Also, in cases where there is neither a protracted process nor a delay of disclosure, an insider list shall be established if disclosure “as soon as possible” does not mean that disclosure takes place immediately.

The insider list shall be promptly updated and, upon request, be provided to the SFSA as soon as possible. Requirements regarding formats and templates for the insider list can be found in the Commission Implementing Regulation (EU) 2022/1210.

Furthermore, the Company is obliged to take all reasonable steps to ensure that each person included in the insider list acknowledges in writing the legal and regulatory duties entailed and is aware of the sanctions applicable to insider dealing and unlawful disclosure of inside information.

The Company’s General Counsel is responsible for maintaining the insider list and for the related disclosure of information to the persons concerned. The Company’s external consultants and advisers may be instructed by the Company to draw up and keep up to date their own insider lists. For advisers and consultants who can be expected to have their own procedures for compliance with MAR, such as law firms, banks and audit firms, the Company should include a contact person for the respective adviser in the Company’s insider list, after which the adviser/consultant shall be instructed to draw up and maintain its own insider list. For other advisers and consultants, the Company should include all of the adviser’s or consultant’s employees who have access to the inside information in the Company’s insider list.

Transactions carried out by persons discharging managerial responsibilities

Persons discharging managerial responsibilities

Article 19 of MAR regulates transactions carried out by persons discharging managerial responsibilities, as well as persons closely associated with them.

A person discharging managerial responsibilities is a person who:

- a) is a member of the Company’s administrative, management or supervisory body, which includes Hemnet’s board members, the CEO and their deputies, or
- b) is a senior executive who is not a member of the bodies referred to in a), who has regular access to inside information directly or indirectly relating to the Company and has the authority to make decisions at management level that affect the Company’s future development and business prospects.

A person closely associated with a person discharging managerial responsibilities is:

- a) Spouse or a person considered equivalent to a spouse, such as a partner or cohabitant, of a person discharging managerial responsibilities.
- b) Children whom the person discharging managerial responsibilities has custody of in accordance with national law.
- c) A relative who has shared the same household for at least one year at the date the transaction took place, such as children of legal age.

d) Legal persons, trusts or partnerships:

- whose managerial responsibilities¹ are discharged by a person discharging managerial responsibilities or by a natural person closely associated with such a person, or
- that is directly or indirectly controlled by such person; or
- which is established for the benefit of such a person or whose economic interests substantially correspond to the interests of such a person.

A legal person referred to in d) above is presumed to be closely associated with a board member and is subject to the notification requirement, see the heading *Notification requirement for transactions* below. Exemptions apply solely if the legal person organises its governance in a manner that precludes the board member from participating in or exerting influence over the legal person's capital investment decisions, whereby the legal person shall ensure that evidence to that effect is maintained.

Hemnet may correspondingly be presumed to be closely associated with a person discharging managerial responsibilities in another listed company, if such person is also a board member of Hemnet. Hemnet's General Counsel is responsible for keeping a register of such listed companies to which Hemnet is closely associated, as well as ensuring that if any transaction is carried out in such company's shares etc., the necessary reporting is conducted.

Register of persons discharging managerial responsibilities and notification obligation

Hemnet shall (i) identify all persons discharging managerial responsibilities, (ii) notify such persons in writing of their obligations under MAR, and (iii) establish a register of persons discharging managerial responsibilities and persons closely associated with them. It is Hemnet that determines which persons that are discharging managerial responsibilities in accordance with the Company's *Routine for handling of PDMR-related requirements under MAR*.

A person discharging managerial responsibilities is obliged to (i) notify the Company of which persons are closely associated with such person, (ii) notify the closely associated persons (both natural and legal persons) of their obligation to report transactions in accordance with MAR, and (iii) retain a copy of the notification. Persons discharging managerial responsibilities shall inform the Company of which persons are their closely associated persons no later than in connection with, and without delay after, the person discharging managerial responsibilities has notified their closely associated persons of their obligations under MAR.

¹ Managerial responsibilities are discharged by, for example, the CEO and any deputy CEO. Board members shall, as a starting point, also be deemed to discharge managerial responsibilities when performing customary board duties. However, an overall assessment of the circumstances in the individual case must always be made when assessing whether a board member has discharged managerial responsibilities. Having regard to how operations are organised at any given time, holders of other senior positions may also be deemed to discharge managerial responsibilities.

Notification requirement for transactions

Pursuant to Article 19 of MAR, persons discharging managerial responsibilities and persons closely associated with them are each separately obliged to notify the SFSA and the Company of transactions conducted on their behalf in respect of Hemnet's shares and debt instruments issued by the Company, as well as derivatives or other financial instruments linked thereto.² The notification obligation is subject to a threshold of EUR 20,000 per calendar year. The transaction that reaches or exceeds the threshold and all subsequent transactions during the calendar year shall be reported as set out below. Disposals and acquisitions are not netted.

The notification obligation is fulfilled by reporting transactions to the SFSA and the Company. Notification to the SFSA shall be made without delay and no later than three business days after the transaction date and is carried out electronically via the SFSA's website. Notification to the Company shall be made by sending the receipt obtained from the SFSA in connection with the notification to pdmr@hemnet.se.

Trading prohibition

For persons discharging managerial responsibilities, a special trading prohibition applies during the 30 calendar days preceding the publication of an interim report or year-end report (a so-called closed period). During such period, persons discharging managerial responsibilities may not conduct transactions for their own account or for the account of a third party, directly or indirectly, in the Company's financial instruments or in related financial instruments. This applies regardless of whether a person discharging managerial responsibilities is in possession of inside information or not. The trading prohibition does not apply to persons closely associated with persons discharging managerial responsibilities in their capacity as closely associated persons.

Under certain circumstances, the Company is obliged to, upon written request from a person discharging managerial responsibilities, permit trading during a closed period in accordance with Article 19.12 of MAR. The Company may furthermore permit a person discharging managerial responsibilities to trade during a closed period under the additional conditions set out in Article 19.12a of MAR. Such exemption shall be granted by the Company's CEO or CFO. Further information on the circumstances under which such exemption shall or may be granted is set out in Commission Delegated Regulation (EU) No. 2016/522.

Responsibility

Hemnet's General Counsel is responsible for ensuring that there are fit-for-purpose routines and processes to enable the Company to fulfil its obligations regarding persons discharging managerial responsibilities and persons closely associated with them, in order to ensure that notification of transactions carried out by persons discharging managerial responsibilities is handled in accordance with this Policy and applicable regulations at any given time.

² Such transactions include, among other things, acquisitions and disposals as well as short selling, pledging and gifts. Furthermore, transactions carried out within the framework of endowment insurance policies are also covered. For further examples of notifiable transactions, reference is made to Commission Delegated Regulation (EU) No. 2016/522 and the SFSA's website.

Non-compliance with obligations

Penalties

Violations of the prohibitions against insider trading, unlawful disclosure of inside information or market manipulation may result in criminal sanctions in the form of imprisonment or fines pursuant to the Act on Penalties for Market Abuse on the Securities Market. In addition, the SFSA may impose administrative sanctions in accordance with MAR and the Act with Supplementary Provisions to the EU Market Abuse Regulation. Such sanctions may be directed at both the Company and individual executives.

In addition to the above sanctions, the Company may take employment law or contractual measures against an employee or consultant who intentionally or through gross negligence violates this Policy. Such measures may, for employees, include termination or dismissal, and for consultants, termination of the engagement agreement.

The Company's cooperation with authorities

If an authority, such as the Swedish Economic Crime Authority (Sw. *Ekobrottsmyndigheten*) or the SFSA, contacts the Company in connection with a suspected violation of applicable securities legislation, the Company shall cooperate fully with the authority in its investigation.

Consultation

An employee or consultant of the Company who is uncertain as to how this Policy shall be applied in a given situation shall without delay contact the Company's General Counsel. All such contact is confidential. If there is uncertainty as to whether certain information constitutes inside information, the information shall be treated as inside information until an assessment has been completed and it has been established that it is not.

Governance

Roles and responsibilities

The CCO is responsible for the Policy. All updates or amendments to this Policy require approval from the Board of Directors. The Board of Directors and senior management are responsible for ensuring that the Company's routines for handling inside information, as well as the rules on trading prohibitions for all persons holding inside information, are upheld in accordance with this Policy.

Follow-up and compliance

Monitoring and review

This Policy shall undergo an annual review in accordance with Guidelines for Hemnet's Governing Documents and Policy for Corporate Governance, in order to ensure that it is correctly formulated and remains fit for purpose for the Company's operations. The review is conducted by CCO and aims to assess whether the Policy needs to be updated as a result of changes in applicable regulations, the Company's operations or working methods, or whether there is otherwise a need for clarification to ensure that the Policy provides appropriate and clear support for regulatory compliance and good

corporate governance. The review is conducted as part of the Company's overall work on risk management and corporate governance.

The Policy's accessibility

This Policy is accessible to all employees and consultants as well as other relevant stakeholders through the Company's internal communication platforms and Hemnet's website at www.hemnetgroup.se.

All employees of the Company undergo mandatory training on Hemnet's *Code of Conduct*, which, among other things, addresses the proper handling of inside information. The training aims to reinforce the Company's commitment to ethical conduct, transparency and compliance with applicable inside information regulations. For further information on the Company's expectations, see Hemnet's *Code of Conduct*.

Reporting channels for compliance issues

Hemnet's *Code of Conduct* sets out which reporting channels shall be used by employees who detect deficiencies in compliance with the Company's steering documents. Each employee is encouraged, where possible, to first raise the matter with the person concerned. If this is not appropriate or possible, the responsible manager shall be contacted. If this is also not appropriate or possible, the employee is encouraged to contact their manager's manager, Hemnet's Chief People & Culture Officer or Hemnet's General Counsel. In addition, serious misconduct may be reported anonymously through the Company's whistleblower function, which is available at www.report.whistleb.com/en/hemnet.

Violations of this Policy

Violations of this Policy will always be taken very seriously and may result in employment law or contractual measures, including termination or dismissal, or termination of engagement agreements. In addition, violations of applicable legislation may result in criminal or administrative sanctions for the individual and/or the Company, as set out above under the heading *Penalties*.

Related documents

Hemnet's General Counsel is responsible for establishing, maintaining and making available the following documents insofar as they are deemed necessary for compliance with this Policy:

- Communications Policy
- Routine for handling of PDMR-related requirements under MAR
- Rutin för beslut om insiderinformation (only available in Swedish)