

Title	Version	Replaces	Org. locations	Page # (of #)
Sustainability Policy	1.3	1.2	N/A	1(6)
Owner	Changed by	Latest changed	Document type	
CCO	Jessica Sjöberg	2026-04-14	Policy	
Adopted by	Adopted on (Date)	Status	Replaced by	
the Board of Directors	2026-05-08	Adopted	N/A	

# Sustainability Policy

## Information

### What does this policy cover?

This Sustainability Policy (the “Policy”) describes the principles for Hemnet Group AB (publ) and its subsidiaries (the “Company’s”, the “Group’s”) sustainability work, the model for how we conduct our sustainability work, and how this work is reported. The policy also defines our overall sustainability goals and Hemnet’s sustainability approach.

### Who does this policy apply to?

On the one hand, the policy is intended to support and apply to employees in the Company who are responsible for driving, tracking and developing the sustainability work (e.g. CEO, CCO, CPCO, General Counsel); on the other hand, it is intended to serve as a general guide for the Company’s approach to sustainability, which in many cases involves all employees in the Company.

### Why have we created this policy?

Hemnet is committed to integrating sustainability practices into all aspects of our operations. Therefore, this Policy has been created to address Hemnet’s sustainability focus, ensuring transparency and accountability in our initiatives. By establishing clear guidelines and responsibilities, we aim to mitigate risks, enhance transparency, and foster continuous improvement in the following key areas: being one of Sweden’s best workplaces, contributing to the combat against climate change, living by strong ethical principles, and creating positive social impact.

## The principles behind Hemnet's sustainability work

As one of Sweden's most visited digital platforms and a hub for the country's housing businesses, Hemnet plays an important role in the Swedish housing market. With our position comes great responsibility, and we are actively working to build a Company that makes a positive impact on the market in which we operate, as well as on society at large.

Hemnet is strongly committed to ensuring that its operations contribute to sustainable development in economic, environmental, and social terms. The Company strives to be open about its sustainability work and expects the same openness from its suppliers. The Sustainability Policy forms the basis for Hemnet's sustainability work, which is implemented in day-to-day operations primarily through our Code of Conduct. Hemnet's expectations of suppliers and partners are set out in our Supplier Code of Conduct.

## **Framework and reporting structure**

The core of our sustainability approach is to be a trusted and independent marketplace enabling a mobile, efficient and transparent property market. As an independent platform, we offer homebuyers, sellers and real estate agents equal access to the market we represent. Hemnet is to be a reliable partner that can be trusted at all times. Thus, ensuring the accuracy, credibility, and high quality of content on Hemnet is a priority. We maintain strict standards for real estate agents listing properties on our platform and monitor adherence to our publication guidelines. We constantly invest in our services to ensure the best quality in our offering and high accessibility to the millions of Swedish consumers turning to our platforms weekly.

We enhance market efficiency and mobility by consolidating a substantial portion of the Swedish housing market in one location. Coupled with our high visitor traffic, this creates an ideal environment for various market players to connect. With nine out of ten properties that are sold in Sweden over a year listed on Hemnet, we contribute to the effectiveness on the property market, and thorough information also about sold objects, including pictures, contributes further to transparency and mobility.

### *Sustainability focus areas*

As described above, contributing to a sustainable and well-functioning market for buying and selling real estate in Sweden is at the core of our business model and vision to enable a mobile, transparent and efficient property market. It is also the core of our sustainability framework. In addition to this our sustainability efforts focus on four areas in which we strive to create positive change:

- Being one of Sweden's best workplaces
- Contributing in the combat against climate change
- Living by strong ethical principles
- Creating positive social impact

### *Sustainability reporting*

Sustainability reporting is intended to help investors, consumers, decision-makers and other stakeholders evaluate the Company's non-financial results in the context of sustainable and responsible business operations. Hemnet should therefore identify sustainability risks in relation to its overall operations, as well as relevant key performance indicators in each of the above focus areas, and follow up on these annually in the Sustainability Report. The focus areas should also be reflected in the Company's Code of Conduct to provide guidance for internal compliance.

## **Sustainability in relation to own workforce**

Hemnet has an appointed People & Culture Officer whose tasks include to manage material impacts, risks, and opportunities related to its workforce across the organisation as well as aligning operational activities with the Company's sustainability efforts, also mirrored in the Code of Conduct. Hemnet's Code of Conduct as well as the HR-Policy and the established processes and routines of Hemnet's People & Culture Team are closely aligned with internationally recognized standards, ensuring our practices support the rights and well-being of all employees. This alignment includes adherence to the UN Guiding Principles on Business and Human Rights.

The relevant processes and routines are described in the HR Policy as well as in other steering documents including the guidelines and routines against victimisation. Specific emphasis is placed on mitigating risks related to workforce well-being and fostering opportunities for growth and development. An example of this is the continuous temperature checks that are carried out digitally and anonymously, where employees are also encouraged to provide comments. Hemnet shall have a stated goal regarding employee satisfaction (eNPS).

## *Health and Safety*

The Company is committed to ensuring employee health and safety. Hemnet's Work Environment Plan, in combination with the Code of Conduct and HR Policy, details our commitment to a safe and healthy workplace and the procedures for managing workplace accidents.

## *Diversity and Inclusion*

Hemnet's Code of Conduct and the HR Policy explicitly covers discrimination based on race, ethnicity, gender, sexual orientation, disability, and other protected characteristics. We are committed to creating an inclusive environment and actively implement measures to prevent discrimination, promote equal opportunities, and support vulnerable groups through employee training.

## *Equal Employment Practices*

Our recruitment, placement, and advancement practices are based on qualifications, skills, and experience, ensuring equal opportunities for all. Senior management is held accountable for promoting equality, and we provide regular training to raise awareness of non-discrimination practices. For more information, see Hemnet's HR Policy.

Hemnet shall strive for an even distribution of gender within all parts of the Company, including the Board. The Company bases its long-term gender distribution goal on the Swedish Equality Authority's definition according to which equality is considered to be achieved when the proportion of women and men in a group is 40/60 percent or more equal.

## **Sustainability in relation to climate change**

### *SBTi*

By joining the Science Based Targets initiative (SBTi), Hemnet has committed to the initiative's net-zero targets for small and medium-sized enterprises. The company has set ambitious targets to reduce direct emissions in Scope 1 and indirect emissions in Scope 2 (those linked to electricity consumption) by 42% by 2030. In 2023, this ambition was expanded by adopting an additional climate target, aiming to achieve net-zero emissions in all three scopes by 2050. For more information on climate work and SBTi, read more in our climate policy.

### *Waste, energy efficiency and renewable energy deployment*

Hemnet's digital business model results in a relatively low impact on climate and the environment. However, we are determined to take responsibility and do our part to contribute to a sustainable housing market within the limits of the planet. Hemnet aims to completely eliminate on-premise IT operations and only use cloud services, which means that no server equipment is managed directly by Hemnet. Our IT solutions are provided by suppliers with ambitious carbon reduction targets. In addition, we focus on energy-efficient practices in our operations and ensure that we maintain high standards of energy efficiency.

A significant portion of the emissions generated by Hemnet stem from the activities of our employees and the operation of our office premises. Therefore, it is important that we choose office properties that meet high sustainability and energy efficiency standards. Hemnet strives to operate in buildings that minimise energy consumption and environmental impact. All energy use and waste management within Hemnet's offices should be done in a way that reduces emissions, promotes resource efficiency and supports circular economy principles, ensuring that our operational footprint is in line with our climate goals.

## *Reduced resource utilisation*

Hemnet shall reuse technical equipment that is no longer required for the business, extending the life cycle of hardware and reducing electronic waste. Obsolete computers, monitors and mobile phones that no longer meet the company's needs are sold to companies that specialise in buying back this type of equipment. The idea is that the products should be reused as much as possible in the local area by, for example, schools, businesses, and individuals. Other technical equipment that no longer functions or meets the company's needs is first examined to see if there are components that can be reused or resold within the company. What is considered e-waste is forwarded to certified recycling companies.

## *Limited travel*

Based on our long-term goal to become climate neutral, we place demands on ourselves as a company and on our employees to make climate-conscious choices when it comes to travel and transport. Hemnet is a national operation, meaning that travel is primarily conducted within Sweden, where we choose the most suitable mode of transport for the purpose. We try, where possible, to prioritize cycling, electric scooters, walking, or using public transport. As a second option, we choose taxis or private cars.

International travel may occur, for example, for knowledge exchange with international counterparts to Hemnet or to meet with investors. We strive to choose digital meetings for international contacts where possible, but sometimes in-person meetings are important for the business and justified. Our employees are expected to make wise choices and not fly more than necessary, and where possible and time permits, choose trains as an alternative.

## **Sustainability in relation to ethical principles**

### *Human Rights Commitments*

The Company is committed to upholding human rights in alignment with key international guidelines, such as the UN Guiding Principles on Business and Human Rights. Our commitment is reflected in our Code of Conduct, HR Policy, and the established processes and routines of our People & Culture Team. These documents provide guidance on relevant human rights areas, with a particular focus on labor rights.

The Company shall have a measurable goal regarding how the Company trains about, and follows up on, compliance with the Code of Conduct internally.

### *Consumer Privacy*

Data is a critical asset for Hemnet, and we process personal data in a transparent way, with respect for privacy and in accordance with applicable data protection legislation. As one of Sweden's most visited platforms, it is crucial that we handle data in a responsible way. We monitor user trust through various methods, including annual checks with The Swedish Authority for Privacy Protection (IMY) on complaints received.

Transparency is central to our goal of improving the housing market, and it is therefore important for us to publish various data points, such as prices and pictures of sold homes. Although our publication certificate provides GDPR exemptions, we are actively working to ensure buyers and sellers are comfortable with published material and that we respect each individual's wishes.

We do not share personal data with suppliers without a data processing agreement and ensure legal safeguards for transfers outside the EU/EEA. These principles underpin our personal data protection efforts and are outlined in our Code of Conduct and, in more detail, in Hemnet's Guideline for Data Protection.

## *Responsible Marketing Practices*

At Hemnet, we are committed to responsible marketing that aligns with human rights, relevant legislation, and ethical advertising standards. To ensure a safe and trustworthy platform for our users, we do not allow advertisements that promote gambling, political messages, misleading information, scams, or false claims. Additionally, we prohibit ads that endorse illegal activities, adult content, harmful products such as tobacco, alcohol, or illegal drugs, as well as advertisements containing malware, excessive tracking, or disruptive auto-play features. Our ad policies are strictly enforced through our ad server settings to maintain a high-quality user experience. Furthermore, the advertisements we sell are not targeted at children, ensuring that our platform remains a responsible and reliable space for all users.

## **Governance**

### **Roles and Responsibilities**

This policy is owned by the CCO, with any updates or amendments requiring approval from the Board of Directors. Senior management and the Board are responsible for ensuring that Hemnet's sustainability practices are upheld in accordance with the 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.

### **Policy Accessibility**

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

### **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**

Breaches of this policy are taken seriously and may be addressed through appropriate measures, which in some cases could include disciplinary action. If a breach also involves a violation of applicable laws, it may have legal implications for both you as an individual and the Company.

## **Related documents**

- Code of Conduct
- Code of conduct for suppliers
- Equality and equal treatment plan
- Hemnet's Principles and Guidelines for Salary Setting
- Action Plan Against Abusive Treatment and Harassment
- Guidelines for Hemnet's environmental work