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Communications Policy

Information

What does this policy cover?

This policy covers the regulations that apply to Hemnet Group AB (publ)'s (the "Company") disclosures to the stock market, the media and the general public as a listed company. Hemnet's *Insider Policy* complements this policy and includes the regulations that apply to persons with access to insider information regarding the Company, as well as senior executives in the Company (so-called PDMRs).

Who is affected by this policy?

It provides support for information and communications efforts for the CEO and senior executives, communication managers and all employees of the Company.

Why have we created this policy?

This policy specifies how and when information is to be provided to the stock market, the media and the general public and by which spokespersons.

Applicable regulations

A company listed on Nasdaq Stockholm must comply with the marketplace's requirements for providing information. The requirements are primarily regulated by Article 17 of the EU Market Abuse Regulation (596/2014) ("MAR") which entered into force on July 3, 2016 and the Nasdaq Nordic Main Market Rulebook for Issuers of Shares ("Nasdaq's Rulebook"). In addition to the rules for providing information to the market, MAR also includes rules for handling inside information and obligations for senior executives and their close associates. Nasdaq's Rulebook also includes more extensive rules for providing information and rules on how financial reports should be designed and disclosed. In addition, there are rules that complement MAR in the Act (2016:1306) on provisions complementing the Market Abuse Regulation, and provisions on criminal proceedings and penalties in the Act (SFS 2016:1307) on penalties for market abuse in the securities market.

Handling of insider information

According to MAR, insider information is information of a specific nature that has not yet been disclosed, which directly or indirectly concerns one or more issuers or one or more financial instruments and which, if published, is likely to have a material impact on the price of these financial instruments; for example, information that a reasonable investor would probably use as part of the basis for an investment decision.

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This policy handles the communication of insider information, while Hemnet's *Insider Policy* covers the rules that apply to persons with access to insider information regarding the Company, as well as persons discharging managerial responsibilities in the Company (PDMRs).

Decisions on whether information is to be regarded as insider information, are made in accordance with the process set forth in the Insider Policy. The Chief Communication and Brand Officer (CCBO) shall be informed immediately for the execution of communication activities.

Disclosure requirement regarding insider information

The main rule is that the Company must publish insider information **as soon as possible**. If there are reasons for the Company not to publish the insider information immediately, the Company may instead under certain circumstances decide to postpone publication of the insider information, see further below, and at the same time decide on the opening of an insider list, see the Company's Insider Policy.

Delayed publication of inside information

In accordance with Article 17 of MAR, the Company may, at its own risk, delay the publication of insider information, provided that the following conditions are met:

- a) Immediate disclosure is likely to harm legitimate interests of the Company.
- b) Delayed publication is not likely to mislead the public.
- c) The Company can ensure that the information remains confidential.

Decisions on postponement of the publication of inside information are made by the CEO in consultation with the General Counsel and, if possible and appropriate, with the Chief Financial Officer (CFO). Each of the CEO, the General Counsel and the CFO shall be independently mandated to decide on the postponement of publication, if consultation is not possible or appropriate. In case the CEO is not involved in the decision, he/she shall be informed, at the latest before the communication is released. The CCBO shall be informed immediately for the purposes of planning of communication activities. If the publication of insider information is postponed according to the above, the Company shall, in conjunction with the postponement decision, document the decision, including information about the person/those persons who made the decision and how the above three conditions have been met. The decision coincides with the opening of an insider list.

If the Company has postponed the disclosure of insider information and then publishes it, the Swedish Financial Supervisory Authority (the "SFSA") must be informed about this immediately. Upon request from the SFSA, the Company must also provide a written explanation of how the conditions for the delayed publication have been met and how it has been ensured that these have been upheld during the whole period of time preceding the publication of the information, which is why the above-mentioned documentation must be prepared. The SFSA shall be informed at the same time as a press release to the market containing the information that has been the subject of delay is published.

Press releases and publication of insider information

According to what has been stated above, insider information shall be published as soon as possible after the decision or event that gives rise to the publication. The disclosure shall not take more time than what is required to compile and distribute the information. A publication cannot be postponed

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until the next trading day, but must in cases where the obligation to disclose information arises during the evening or weekend be published at that time.

The CCBO is responsible for preparing a draft press release prior to a decision with proper planning. Before distribution, the press release must be approved by the CEO and the CFO. Press releases containing insider information are commented on by the CEO and in certain issues, by the Chair of the Board.

It is prohibited to provide insider information, for example, at the Annual General Meeting or at a meeting with analysts, unless the information is published simultaneously. If Hemnet intends to provide such information during an Annual General Meeting or other meeting, a press release with the insider information shall be published simultaneously.

Distribution of insider information

Hemnet shall ensure that the insider information is published in a manner that gives the public quick access to the information and that provides for a complete and correct assessment of the information in a timely manner. The CCBO is responsible for ensuring that insider information in the form of a press release is published without delay to the public in a non-discriminatory manner. CFO has the corresponding for interim reports and annual reports. Hemnet shall not combine the disclosure of inside information to the public with marketing.

For distribution of press releases with insider information, an established information distributor is used to ensure that Nasdaq Stockholm, the SFSA, established news agencies, newspapers and the public in general can simultaneously access published information without delay. Hemnet's regulatory press releases are to be distributed in Swedish and English and are also made available in connection with distribution on the Company's website, hemnetgroup.com, where it is clearly marked which press releases are of a regulatory or commercial nature respectively.

Press release content and labelling

Information published by Hemnet must be accurate, relevant and clear, and it must not be misleading. Information regarding decisions, facts and circumstances must be sufficiently detailed to enable an assessment of the significance of the information to Hemnet and its financial instruments.

In a press release with insider information, the most important information must be clearly presented at the beginning of the press release. Each message should have a heading that summarises the content. This means that the information must be sufficiently detailed to enable an assessment of the significance of the current matter to Hemnet and its financial instruments. To exclude information could also result in Hemnet's disclosure being incorrect and misleading.

All of Hemnet's press releases containing insider information must be clearly marked with reference to MAR. The press release should also contain the following:

- That the information released is inside information.
- Company name.
- The identity of the person communicating the message as well as contact information.
- Date and time of the release to the media.

Other regulatory press releases are published in accordance with Nasdaq's Rulebook or other applicable laws and regulations. For relevant legal references in press releases, etc., see the document "Press release template" which includes examples of references in press releases containing inside information and financial reports.

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Other communications pertaining to insider information

The CCBO is responsible, when necessary, for drawing up documentation that summarises questions that may arise as a result of the published communication, as well as the Company's official responses and messages regarding the news being communicated. Communication should also be prepared when necessary, to inform Hemnet's staff, (for insider and regulatory information, the internal information should never be released prior to information to the stock market and its stakeholders without exception – see below under the section "Internal communication"). Any communication relating to insider information shall be approved by the CEO and the CFO.

Handling and archiving of documents with insider information

Preparation for press releases and other communications concerning insider information are done with great care and in such a way that only those logged in the insider list have the possibility to access the information in advance of release. Any printouts around the information must be stored in a locked place or discarded in lockable containers intended for confidential information.

All documentation that contains insider information must be handled with great caution. The documents are only to be shared with individuals logged in the insider list. In the event there is a need to share information with an individual that is not on the insider list, the individual shall be added to the insider list according to the routine detailed in Hemnet's Insider Policy. Advance information to Nasdaq Stockholm

If the insider information is of extraordinary importance, Nasdaq Stockholm should be contacted prior to release. This is to ensure a fair distribution of the information to the greatest extent possible. In instances where an event occurs outside the Company's control, the Company shall inform the exchange about the event as soon as possible.

Profit warnings

In the event that the financial results or financial position of Hemnet deviates significantly from what is reasonably expected based on previously published information by the Company, information on such a deviation may constitute insider information and shall then be published as soon as possible. Nasdaq's view is that in such a case, a postponed disclosure would likely mislead the market, so an immediate disclosure through a press release must be done (commonly referred to as a profit warning). If there is uncertainty as to whether results or a financial position materially deviates from what can reasonably be expected, the Company shall immediately consult Nasdaq's Surveillance department and the Company's advisers.

Release of regulatory information

In accordance with Nasdaq's regulations, the Company also has an obligation to publish information under the specific situations below, regardless of whether these events are considered insider information or not.

- Meetings
 - Notice of general meetings of the shareholders and annual general meeting communication.
- Board of Directors, executive management team and auditor

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- All changes in the composition of the Board, significant changes in the executive management team and the resignation, dismissal or change of auditor.
- Incentives
 - Decision of the Company to introduce share-related incentive programs. The information must be sufficiently detailed to enable an assessment of the program's impact on the Company's earnings and financial position.
- Issuance of shares or equity-related instruments
 - If the Board of Directors or the annual general meeting decides on the issue of shares or financial instruments with the right to subscribe for shares or if the Board decides to propose to the annual general meeting on such a decision.
- The buying or selling of own shares
- Trading at another trading venue
 - In the event that another stock exchange or marketplace decides to initiate/suspend trading in financial instruments issued by the Company.
- The Company shall publish the audit report immediately after it has been submitted to the Company if it is qualified or does not have standard content.
- Annual reports and interim reports.

The CCBO is responsible for preparing press releases for the above situations in consultation with the CFO and the CEO. As in the case for press releases for insider information, other regulatory press releases should always be approved by the CEO and the CFO before publication.

The CCBO is also responsible for developing external (questions and answers) and internal information as described under the heading *"Press releases and publication of insider information"* above.

Authorised spokespersons

The following positions, without exceptions, may speak on behalf of Hemnet in communication with the stock market's stakeholders and the media regarding financial and regulatory information:

- **The Chair of the Board** speaks on questions relating to ownership and board matters as well as issues of great strategic importance to the Company. This applies, for example, to issues surrounding the Board's work, general meetings, incentive programs and management remuneration.
- **The CEO** is the spokesperson in important issues concerning the Company's strategy, focus and operational activities and the only one, in addition to the Chair of the Board, who comments on insider information in press releases and to the media. Regarding follow-up questions from the media relating to already communicated regulatory information, the CEO can delegate the spokesperson responsibility to the CFO, CCBO or Head of PR. Regarding follow-up questions on regulatory information from the capital market, the CEO can delegate the spokesperson responsibility to the CFO or to the IR Manager.
- **The CFO** is ultimately responsible for communicating with the capital market. The CFO can delegate this responsibility to the IR Manager. The CFO can also answer questions from the media around areas concerning the Company's communicated financial results and questions concerning the Company's relationship to the capital market. The CFO is also responsible for providing the CEO and the Board of Directors with correct and relevant information about the Company's financial position and results.
- **The CCBO** is ultimately responsible for communication from the Company to the media and employees and for relevant information to be distributed to relevant stakeholders (for

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example, to the media, authorities, opinion leaders and the Company's employees). The CCBO is also responsible for ensuring that clear messages and Q&A are in place regarding issues that may come from the media in general, but regarding communicated insider information in particular. CCBO has the mandate to speak on behalf of the Company in matters concerning operational activities as well as commenting on behalf of the CEO on follow-up questions regarding published insider information, according to agreed messages. The CCBO can delegate the spokesperson role to the Head of PR.

- **The Head of PR** is responsible for the Company's relations with the press and media. The Head of PR has the mandate to speak for the Company in issues relating to general news from the Company, products, certain organisational changes or other operational events (see below under "Spokespersons for commercial information"). Regarding issues concerning communicated insider information, the Head of PR always speaks in consultation with the CEO, CFO or CCBO and in accordance with agreed messages. The Head of PR is also operationally responsible for distributing relevant information to the media and other stakeholders through the Company's system for distribution of press releases.
- **The Investor Relations manager** is responsible for the Company's relations with and communication to the capital market, and also has the mandate to speak for the Company to this target group.

The CEO, CFO and CCBO should strive to always be available, especially in connection with reporting, when press releases are made or when a news item that concerns the Company has come up.

Other employees and senior executives within the Company, who are contacted by investors, shareholders, analysts or the media, must, without exception, directly refer to the Head of PR or CCBO who then passes the question on to the relevant spokesperson depending on the nature of the question.

Spokespersons for commercial information (not insider or regulatory information)

In commercial communications for marketing purposes that are not of a regulatory or insider nature, spokespersons other than those above may be relevant depending on the topic and area. Anyone who makes a statement to the media should always coordinate this through the Head of PR or the CCBO. The Head of PR can also act as a spokesperson on these issues. When it comes to questions about the Company's overall strategy, results or other issues that are critical to the business, the Head of PR never speaks until messages have been agreed to by the CCBO and approved by the CEO.

In the case of in-depth questions about the Company's overall strategy and results, solely the CEO or Chair of the Board may make a statement.

Individual employees may never act as spokespersons for the Company unless agreed to by the Head of PR/the CCBO.

The Company's investor relations contacts with the stock market's representatives

In order to give a true and fair view of the Company, Hemnet has an immediate, transparent and continuous contact with the stock market. This means that, with the exception of quiet periods, representatives of Hemnet can have ongoing conversations and meetings with analysts, institutional investors or other professional players in the market.

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All contacts with the stock market are handled or coordinated by the CFO and/or IR Manager. At the Company, only the CFO and/or IR Manager as well as the CEO are allowed to meet and talk with stock market representatives on their own. If necessary, other experts from the Company can also contribute to provide a more detailed picture of, for example, the development of a business area or a product. However, representatives from the Company other than the CFO, IR Manager or CEO may never, on their own initiative or by themselves, hold discussions with stock market representatives. It is the responsibility of the relevant speaker (CFO, CEO or IR Manager) to ensure that the information provided is factual, consistent and complies with the Company's adopted Communications Policy.

It may be permissible to submit information that has not been publicly disclosed to analyst contacts if the information is not considered insider information. However, it is important to keep in mind that if sensitive information is disclosed, and the disclosure may harm the Company, e.g. for competition reasons, the informant may be liable for damages against the Company, which is why such information may not be provided without permission from the CFO, CCBO or CEO. It is however always allowed to:

- Remind about previously released information.
- Correct misunderstandings, accounting errors and obvious factual errors.
- Provide industry statistics.

Should insider information be accidentally disclosed in a dialogue with stock market representatives, for example in response to a question, a press release should immediately follow in accordance with the procedures for press releases on insider information detailed in this policy.

Regarding the Company's analyst and media contacts, the following applies:

- If an analyst has received certain information, the Company cannot deny another analyst or journalist the same information. This should be included in the Company's assessment of whether the information can be disclosed.
- The Company should be prepared to provide the same information for analysts to the media.
- It is forbidden to provide analysts or journalists with information about upcoming news, regardless of whether they promise not to publish it prior to release. This does not apply to purely commercial news or PR activities that are not of an insider or regulatory nature.
- The Company should always invite the media to analyst meetings to reduce the risk of such meetings being perceived as suspicious.
- Analysts should be treated fairly and have access to the same information whether they represent a small or large owner or analyst firm.
- Hemnet should only comment on analyst reports to the extent that they contain factual errors.

Crisis management and managing information leaks

For incidents that could potentially develop into a crisis, or where information leaks would have a negative impact, the CCBO is responsible for preparing material in the form of draft press releases, internal communications, and questions and answers to address questions from the public, the media and customers.

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Managing information leaks

By following the routines in this Communications Policy, the Company works proactively to avoid information leaks. It is vitally important that the Company's employees know the significance of not sharing sensitive information and follow the Company's established procedures and processes for disseminating information. The Communications Department is responsible for ensuring that all new employees within the Company receive a review of the primary elements of this Communications Policy during their on-boarding, and that all of the Company's employees are informed of the contents of this policy at least once a year or when necessary. Furthermore, senior executives should make it clear to employees who have access to insider information how important it is not to disseminate this information. When handling information relating to regulatory and insider information, the Company must be careful to never inform more people than necessary.

In the event that insider information is still leaking from the Company, the Company shall immediately contact Nasdaq Stockholm for advice so that trading can be stopped if necessary before it is affected by any information leakage. In the event of information leakage, the Company must always report the actual circumstances.

For questions from the media, the general public and customers about rumours and speculation regarding the Company, the Company must consistently and always respond: "The Company has a policy not to comment on rumours and speculation". If the rumour is harmful to the Company, a clarification should be made through a press release.

Prior to important decisions, the CCBO is responsible for preparing the basic information for a press release and approving it promptly in accordance with the procedures described above for "*Press releases and publication of insider information.*"

Internal information

Communication is one of the most important tools to help a company to achieve set goals. Well-functioning communication creates participation and ensures that everyone is striving for the same goal. Within Hemnet, there are great expectations that information be honest, fast, accurate, complete and easily accessible. All employees should be continuously informed about important events in the Company and specific information relating to specific offices or departments. Through good internal information, Hemnet aims to increase employees' knowledge and also provide them with the opportunity to offer their views on the business.

The goal is for all employees to know and understand the Company's goals and plans. They should be aware that the outside world's view of the Company affects the Company's success in the market. Managers are all responsible for ensuring that the information functions as it should within their area of responsibility and that internal information - regardless whether such information is confidential or not - is not publicly disclosed in other ways than as set forth in this Policy. In order to ascertain that the Company is in control of internal information, employees must not engage in consultancy engagements where they are asked to share knowledge or information about any aspect of Hemnet or Hemnet's business or the property market.

All internal information must take into account existing regulations, which may lead to limitations in the scope of internal information. This means that not all information can be disseminated to all employees due to regulations and competition reasons. Insider information must, according to the rules, be properly released before the information is distributed internally. It is therefore important that all employees handle all company information carefully. If they do not know for sure that certain

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information is not price-related or has been published, they may not disseminate information about the Company either within or outside the Company.

It is the responsibility of the Company's CCBO to ensure that the Company's employees know the information dissemination guidelines as laid out in this policy.

Release of financial reports

Hemnet publishes interim reports and annual reports within two months of the end of the reporting period. The Company shall on www.hemnetgroup.com publish a financial calendar with information on the date when the Company is expected to publish these, among other things.

Annual general meeting and extraordinary general meetings

The annual general meeting and any extraordinary general meetings are Hemnet's highest decision-making body, where the owners jointly decide on important issues for the Company. The date of the annual general meeting must be stated in good time, which in the case of the annual general meeting means at the latest in connection with the publication of the report for the third quarter.

The CFO is responsible for sending out the notice of the annual general meeting and extraordinary general meeting as well as for other planning and implementation of the meetings. The CFO or IR Manager is also responsible for updating the Company's website with relevant information regarding the annual general meeting, etc.

Financial Calendar and quiet periods

According to Nasdaq's Rulebook, the company is obliged to publish a financial calendar on its website for each calendar year with dates for publication of interim reports, year-end report, annual report, annual general meeting and payment of dividends. Any changes to the pre-announced dates must be announced in a press release.

Hemnet observes a quiet period starting 30 days before the publication of a quarterly report. During this period, the Company's representatives refrain from meeting financial media, analysts and investors and from answering questions or commenting on financial developments.

The Company's website for financial information

On the Company's website, hemnetgroup.com, all published information about the Company since the date of the Company's listing on Nasdaq Stockholm should be available. The information must be kept available for at least five years. However, financial reports must be available on the website for at least ten years following publication. The published information shall be made available on the website as soon as possible after publication. Press releases containing regulatory and/or insider information should be separable from news that does not contain regulatory and/or insider information.

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The website must also contain, among other things, the following information:

- Annual reports, prospectuses and other information published or made available to shareholders.
- Information about the Board of Directors.
- Executive management group information.
- Information on corporate governance in accordance with the Swedish Code of Corporate Governance.
- Current Articles of Association.
- Financial calendar.

The CCBO is ultimately responsible for the Company's website for financial information and for keeping the page updated with relevant and accurate information. In addition to CCBO, the General Counsel, IR Manager and Head of PR have the mandate and possibility to update the website with relevant information in their respective areas.

Guidelines on participation in stock chats and social media

So-called "stock chats" are discussion boards for those interested in the stock market. It is not consistent with Hemnet's Communications Policy that the Company's employees participate in such chats with regards to Hemnet, even if it involves disseminating or commenting on information that is already known by the market. This is not allowed even if it is done under a pseudonym or if participation is from a private computer.

Our employees are our best ambassadors, and we are positive if they want to spread information and knowledge about Hemnet in a positive way in their own channels. However, the Company's employees may not spread or comment on information about the Company via social media beyond what is specified in the guidelines below. Our employees must distinguish between when they participate in social media within their employment framework and when they participate privately. As a private person, you should remember that participation and comments may be perceived as a post from Hemnet, especially if it concerns industry-specific issues or when you, as an employee of Hemnet, express yourself based on your profession.

Employee Guidelines for Participation in Social Media

- All communication and participation in social media must be consistent with the Company's Communications Policy and Insider Policy.
- As an employee at Hemnet, you are careful with professional advice via social media. Employees must refer to the correct instance/channel to avoid incorrect information or misinterpretations.
- It is of course permitted, and positive, to share the posts from Hemnet's channels and participate in discussions that fall within the scope of individual employees' areas of expertise. As an employee at Hemnet, it is however important that you are clear about your role and that you represent the business (for example on LinkedIn).
- Employees report to Hemnet's communications department if they discover negative/inappropriate messages about the business that Hemnet should respond to from the Company's side.
- It is encouraged to publish your posts from the workplace, for example, by sharing small and big joys at work.

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- Material that can be perceived as offensive or threatening should never be published.
- Employees must never publish confidential or sensitive content concerning company secrets, customers, or colleagues.
- As an employee, you never comment on anyone or anything in a derogatory tone.
- Hemnet's employees mention competitors, customers, partners, suppliers, or other stakeholders to Hemnet with caution. Employees at Hemnet are always a representative of the Company, and without exception, we treat our various stakeholders with business acumen, professionalism, and respect.

Enforcement of compliance

The owner of the Communications Policy is Hemnet's Chief Communication and People Officer (CCBO) who is responsible for the Company's communications department, which in turn is responsible for the Company's brand and marketing; relations with the media and authorities and Customer service.

The Communications Policy is applicable to all internal and external communication from Hemnet and thus affects all of the Company's employees. The Communications Policy must thus be made open and accessible to all the Company's employees. It can also be made available to external stakeholders upon request.

The Company's CEO is ultimately responsible for the communication and compliance with this policy as well as with the rules that surround it.

Ensuring compliance with this policy

Updates to this policy

This policy is to be reviewed by the Company's CCBO for content and correctness annually in accordance with Guidelines for Hemnet's Steering Documents.

Assessment of compliance

Once a year, the CCBO together with the General Counsel conducts an internal check of compliance with this policy. The evaluation includes to:

- Check that insider lists that have been kept have been closed in conjunction with the publication of the relevant information;
- Check that the Communications Policy is available for all staff; and to
- Check that closed periods have been respected, meaning that the Company 30 days ahead of report release have refrained from meeting financial media, analysts and investors and from answering questions or commenting on financial developments.

Any compliance-issues in relation to this policy shall be reported to the General Counsel.

Reporting to the Board of Directors

The CEO annually reports policy compliance to the Board of Directors. The results of the internal assessment described above shall be reported annually to the Company's Audit Committee and the Board of Directors within the framework of this report.

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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

The Company's CCBO is responsible for compiling, making available and maintaining documents containing the following documentation for the publication of insider information:

- Instructions for labeling press releases containing insider information and financial reports