

C.E.O. on C.o.C.	Intro to the code	Living by the code	We act ethical in line with our beliefs
We celebrate diversity & equality	We contribute to a workplace free from harassment	We promote a safe & healthy workplace	We avoid conflicts of interest
We communicate in an open, honest & responsible way	We protect trade secrets & confidential information	We reject bribery & inappropriate gifts	We keep accurate records & protect company assets
We follow the law	We play fair	We promote a happy, healthy life for consumers	We contribute to a happy planet
We contribute to a healthy society	Reporting breach of the code	Code acknowledgement	

# Our Code of Conduct and why it matters

**Our Code of Conduct reflects what we stand for** and applies to all employees, management and board members. It defines the standards of behaviour that are essential to our company and its ethical business principles.

We recognize that our primary responsibility is to our consumers, health authorities and government bodies around the world in the fight against the negative effects of tobacco. We strive to act ethically and morally in everything we do. We provide pioneering products and cutting-edge insights that create enlightened ambassadors for change and provide great consumer experiences. By our actions, we help millions to enjoy a longer, healthier and richer life. We believe that our influence on the global arena will make a difference and help consumers make informed choices now and in the future.

We want to enlighten people to choose safer nicotine by educating and providing healthier alternatives. We are committed to reducing or even preventing the 8 million deaths related to tobacco each year, whereof over 1 million deaths due to secondhand smoking. We offer tobacco consumers healthier alternatives – from tobacco free products with nicotine to ease the transition and help break unwanted habits, to nicotine free products for a brighter future.

**The goal of making the transition to a healthier and happier life** is at the core of what we do.

In order to do this, we must all act both responsibly and ethically. We must consider the impact of our behaviour on both our consumers and colleagues and recognise that how we interact every day shapes our future. Each of us has an obligation to represent our company in a responsible, honest and ethical manner. The Code of Conduct defines the main principles on how we do business.

The Code of Conduct cannot cover every situation that we may encounter at work, but it can help guide us in the most common situations. We are all accountable for our own actions, so when in doubt please raise concerns with your supervisor or management. If you wish to raise your concerns and remain anonymous, please raise consider the whistle blower policy described later in the Code of Conduct.

We expect every colleague to be familiar with Haypp Group's Code of Conduct. If we live by the spirit of the Code of Conduct and use it in our daily interactions, we can take pride in the results that we achieve.

Our fundamental rule for success is to use good judgement in all situations to ensure we do the right thing for today and tomorrow. If it doesn't feel right – it probably isn't. Understanding our Code of Conduct is a good starting point for that journey. Let's take action to ease the transition to longer and healthier lives for our consumers and their families.

Gavin O'Dowd, CEO

# Introduction to the Code of Conduct

This Code of Conduct is one of the most important documents you will read during your time with Haypp Group. **It represents our dedication to compliance with the law and our commitment to ethical business practices.**

The code applies to all employees, managers and executives within the Haypp Group as well as the Board of directors. References to “us”, “we” or “you” in the Code include all these individuals that must follow the Code of Conduct guidelines.

Haypp Group and its subsidiaries are sometimes referred to collectively in the Code as the “Company” or “Haypp Group Companies”.

Suppliers to Haypp Group must follow a separate code called **“The Haypp Supplier Code”**.

## How the Code can help you...

It enables you to:

- Make good day-to-day decisions
- Understand what is expected from you.
- Uphold our values, care for our reputation and build our brand.
- Conduct yourself honestly and ethically.
- Understand what to do or where to go if you need guidance.



# Living by the Code

At Haypp Group, we take pride in the commitment of our people and the amazing achievements that result from that drive. This can only be achieved in a climate of **trust, respect and an open and honest communication**. All of your dealings with your colleagues should be conducted as a partnership, in which each individual's behaviour is governed by an **overriding commitment to maintaining the highest ethical standards**.

When you make decisions or are faced with difficult situations, ask yourself the following:

- Is the action legal?
- Am I authorized to take this action?
- Does it comply with the Code?
- Does it comply our policies?
- Does it respect the right of others?
- Does it reflect our company values and ethics?
- Does it benefit the company as a whole – not just a certain individual or group?
- Would I be comfortable if my actions were made public?

If you are unsure about any of the answers, ask for help from you manager or the Legal department.

## EMPLOYEES have a responsibility to...

- **Treat people with respect and trust.** A great working environment starts with you. Everyone can foster friendly, open and honest working relationships.
- **Follow the Code.** Understand it and live it in your daily working practices.
- **Abide to the Law.** Understand the relevant laws and regulations that apply to your job. If you are unsure about specific matters, contact Haypp Legal.
- **Think first, then act.** Use good judgement, Act honestly and ethically.
- **Dare to ask.** If anything in the Code is unclear discuss it with your colleagues or talk to your manager.
- **Be aware.** Stay alert to any the issues within the company that may breach this code or other company policies.
- **Report concerns.** Do not ignore violations of the Code of Conduct. Report any concerns to your supervisor or manager immediately.

## MANAGERS responsibilities...

- **Lead by example.** Be a role model and show that you take the Code seriously. It will protect and build our brand long-term.
- **Treat people fairly.** Treat them as individuals and provide them with the freedom they need to do their jobs. Foster a happy and healthy workplace where creative and innovative problem solving thrive.
- **Talk about the Code.** Let the Code be part of the day-to-day work at the office.
- **Stay informed.** Make sure you keep up to date with any changes to the Code of Conduct and respond appropriately if your colleagues raise concerns.
- **Guide your colleagues.** Make them aware of our ethical expectations and provide them with feedback for performance improvement.
- **Be open and create a “speak up” culture.** Make sure people feel comfortable discussing any issues that may arise.
- **Take action.** If you have are worries about misconduct or simply have ideas on how to improve the Code, talk to your manager or use the anonymous whistleblower function.

# The purpose of ethical behaviour

Everyone contributes to the happy working environment at Haypp Group. Your behaviour creates an inclusive, open and meaningful workplace that allows us all to grow and thrive in an environment where commitment, personal accountability and integrity lead to mutual trust and respect. We live what we believe and let our purpose, vision and mission guide us to do the right thing.

We aim to make a difference in society and to have a positive impact on world health. All principals in this code derives from that intent. Our higher purpose is to **inspire healthier enjoyment** and thereby improve people's lives. We believe that enlightened people will choose safer nicotine, so it is our job to ensure that as many people as possible are well-informed and can make an easy transition to a healthier choice.

We put the consumer first. We engage with them every day to understand their needs and desires, and we aim to know them like no other in the industry. Our vision will help consumers change harmful habits, and at the same time increase our global presence. It is a win-win for all parties.

## Our values

Society is demanding a change in the tobacco and nicotine industry. We believe that to inspire to a healthier choice is pivotal to drive the global change. As a result of our success in Scandinavia and our recent achievements when entering new markets, we are in a unique position to help drive that change to society.

We are truly passionate about people's health and well-being and we can and will be a changing force in society in this matter. In our mission we will analyze to **gain insight** and **interact** with all necessary stakeholders with the aim to **accelerate change** and **improve the customer experience**.

**OUR HIGHER PURPOSE**  
Inspiring Healthier enjoyment.

## OUR MISSION

We are the consumers first choice because we are the leading, innovative and disruptive force that delivers first class customer experience. We truly understand our customers needs and desires and shape our business thereafter.

## ETHICAL BEHAVIOUR

**The consumer is the focus of our business model and everything depends upon the consumer's experience.** To earn their trust, we maintain the highest ethical standards for customer service, and for handling any complaints or for dispute resolution.

To prevent all forms of corruption, bribery and extortion, we have policies and procedures in place. These ensure appropriate behaviour to guide us in the workplace. We have a mechanism for "whistle blowing" in case things go awry. Ethical behaviour is fundamental to the way we do business and is necessary to support our ambitions in a market that places high demands on both us and our suppliers.

**Our ethical standards are key to maintaining the highest level of consumer confidence.**

# Diversity and equal opportunities

We strive to maintain an **inclusive work environment** and achieve excellence by attracting and retaining **people of all backgrounds** in our workforce. Diversity matters. Studies prove that diversity creates better workplace performance with more innovative ideas and broader perspectives.

Everyone should enjoy **equal opportunities** in the workplace. There should be no discrimination based on race, color, religion, gender, age, nationality sexual orientation, marital status, disability or any other potential cause for discrimination. We encourage all employees to embrace differences as an opportunity to see new things, learn and innovate.

See the **Employee handbook** for more details on how we work with diversity.

## Did you know...

Diversity in gender, country of origin, career path, and industry background are all inextricably linked to innovation. Diverse teams can leverage a greater variety of perspectives and opinions; provide more comprehensive, well rounded solutions; solve problems faster and have increased job satisfaction and knowledge sharing.

A diverse working environment is also linked to reduced instances of interpersonal aggression and discrimination, since a diverse team is more likely to recognize and act on risk factors. Companies with gender-diverse boards have fewer instances of controversial business practices such as fraud, corruption, bribery, and shareholder battles.



## Celebrate diversity

Talk to everyone at work – regardless of interests, background, goals or views. The more different they are from you the better – you might gain a new perspective, grow and learn more. It can even be a source of new ideas or the start of a successful friendship.

We encourage creative and innovative thinking. New perspectives and insights can help you with that.

If you are a supervisor, treat your team members as individuals and embrace diversity.

# Treat each other with dignity and respect

We recognise the right of everyone to work free from violence and harassment. We are committed to ensuring that all our employees and business partners work in a safe and respectful environment that is free from harassment, bullying and discrimination. Our everyday interactions should show respect for each others' opinions. All employees must be treated equally and in a respectful manner.

Any type of harassment, including but not limited to physical, sexual, verbal, is unacceptable and can result in disciplinary action up to, and including, termination. Our non-harassment policy includes all employees, job seekers, trainees and hired or borrowed workers, in all encounters with our company.

## Contribute to a happy workplace

Treat all fellow employees, customers, business partners and other stakeholders with dignity and respect at all times. Be respectful and kind and you will see the positive impact it has on the company's culture and a rewarding work atmosphere.



## Did you know...

**Harassment can include** actions, language, written words or objects that create an intimidating or hostile work environment, such as:

- Yelling at or humiliating someone
- Physical violence or intimidation
- Unwanted sexual advances, invitations or comments
- Visual displays such as derogatory or sexually-oriented pictures or gestures
- Physical conduct including assault or unwanted touching
- Threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences

### **Bullying behaviour includes:**

- Spreading malicious rumour or gossip
- Excluding or isolating someone socially
- Establishing impossible deliverables
- Withholding necessary information or purposefully giving the wrong information
- Intimidating someone
- Hindering someone's work
- Unfairly denying training, leave or promotion
- Constantly changing work guidelines
- Sending offensive jokes or emails
- Criticizing or belittling someone constantly
- Tampering with a person's personal belongings or work



# Safe in the workplace

We are passionate about health and strive to contribute to a healthier life. We continuously strive to create a happy and healthy workplace that goes beyond health and safety laws. We endeavour to eliminate potential hazards from the workplace. We comply with applicable occupational health and safety standards. We continuously improve improvement in our health and safety policies and procedures. We raise awareness of stress and mental illness to make our workplace a rewarding and productive as possible.

All employees are expected to contribute to these aim and comply with applicable health and safety laws, regulations, policies and procedures at all times. Employees are required to report workplace injuries, illnesses or unsafe conditions.

## WORKPLACE PERFORMANCE

A success factor for companies is the engagement and skills of the employees, personal development is increasingly important for them. We know that HAYPP develops when our employees reach new levels in their own development. People who are involved in HAYPP's operations and development should know the long-term ambitions of the group.

It should be clear that there are development opportunities for all and that efforts to improve leadership, sustainability, innovation and other skills form a coordinated whole and create value for employees, customers, companies and society alike.



## We all contribute to a happy workplace

- We want everyone to contribute to a safe and healthy working environment. It helps to provide your own productive work life.
- Stay informed of potential hazards at work and help reduce risk.
- Don't be afraid to talk to your manager or HR if you, or a colleague, suffer or risk suffering from any mental or physical illness.
- Try to maintain a healthy work-life balance for you and your team. Care for yourself, your family and fellow team members.
- Schedule regular physical activity. It has many health benefits and helps you sleep better, increases your mental abilities and helps you cope with stress. It can even make you happier.
- Be moderate and responsible at company gatherings or when representing the company with external parties. Know and follow our **Drug and Alcohol Policy**.
- Feel free to provide suggestions for further improvements to inspire a healthy, happy and productive workplace.



# Avoiding conflicts of interest

A conflict of interest can occur when an employee's personal activities, investments or associations compromise their judgment or ability to act in the company's best interests. It is important to avoid anything that seems to compromise your objectivity or use of independent judgment in conducting business for or with the Company.

Conflicts can arise in many situations and it will not always be easy to distinguish between proper and improper activity. Employees should strive to avoid the types of situations that can give rise to conflicts of interest.

It is important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their manager or the legal function before taking action.

## How to avoid conflicts of interest?

You can avoid a conflict of interest by making a conflict officially known or removing yourself from a decision that involves the subject of conflict. E.g. you may wish to suggest that your sister or brother is the best person for a job, but let someone else, who has no conflict of interest, be the judge.

Three common areas where conflicts arise:

- Do not disclose confidential information or trade secrets.
- Do not compete or put your personal interest first.
- Do not solicit employees or customers to leave Haypp.

## Did you know...



### Examples of conflict of interest:

- To have a side business or a second job that competes with you work at Haypp.
- To improperly disclose or personally use **confidential information** gained through your employment.
- To hire a close friend or relative, without someone impartial making the decision.
- To discuss the company with external parties.
- To provide a benefit to a supplier who is a friend or relative and allow that supplier to circumvent the bidding process or give the supplier the bid without following appropriate procedures.
- To ask for and **take bribes** or **accept inappropriate gifts** (this can often be a crime).
- To take the company's customer list or other trade secrets and directly compete.
- To disclose information that may conflict with the best interest of the company is prohibited even after you have left the company.
- To convince other employees to leave the company with you.

# Communication

We strive to have open and honest communication between people in the organisation based on mutual respect and trust and to foster a positive workplace. We ask everyone to take responsibility for communicating, be inquisitive, ask questions, take the initiative, and share insights regardless of whether you are a manager or not. Collaboration and creativity are critical to solving problems and achieving the goals of your unit and company. An open, honest and understanding atmosphere makes it possible.

Internal and external communication that are not face-to-face should be done through the proper channels and IT resources allocated by the company. It is important to remember that you are the public face of the company and are communicating in the company's behalf.

## External communication on behalf of the company

- Feel free to talk about Haypp and your working day with friends and family, but never talk about our strategies and business plans with people outside Haypp.
- In order to protect our brand and our business and give correct information only authorized personnel are to represent the company to media and/or legal authorities.
- If approached by, Media, State Agencies, Bloggers, Financial Analysts, NGOs, Business Organizations, Competitors, Schools, refer them to the External Affairs department, don't give answers you are not authorized to give. Please consult with External Affairs about next step.
- We do not make health claims about our products. We refer to others claims.
- We never compare nicotine pouches with tobacco, food or pharma.
- If in doubt, please ask.

## USE OF INTERNET AND SOCIAL MEDIA

The Internet and Social media offers opportunities to network, find information and create exposure for the company and the brand. The company respects the employees' right to use Internet and social media for personal and professional purposes provided that the use does not interfere with any direct or indirect obligations with or for the company. Employees are responsible for following the company's policies and procedures when communicating on social media. Employees are responsible for the information they publish online.

### Follow these rules on-line

- Be honest about your relationship with the company when you comment online about questions related to the us.
- Respect the privacy of other employees and refrain from posting pictures of them without consent.
- Make sure all information you publish about the company is accurate.
- Follow the rules for the social media sites you use.
- Please follow Haypp in social media and update your LinkedIn profile.
- If you want to, please like and share Haypp's posts.
- Please do not write about any of the Haypp products on your own channels.
- We never engage with underaged consumers.
- Don't pretend to be someone you are not online.
- Don't speak on behalf of the company unless you explicitly have the authority to do so
- Don't share confidential information about the company, its customers, stakeholders or suppliers.
- Don't post comments or images which can be perceived as abusive and offensive or may harm the company's brand, reputation or commercial interests .
- Don't violate the law, e.g. don't incite action against ethnic, religious, political or ideological groups, don't view child pornography, don't post depictions of violence, do not slander or defame and do not infringe data breach or copyright rules.
- Don't download files, programs or click on links, either on websites or in e-mail, which may affect the company's IT security. Check Haypp's **IT Policy** for further guidance.
- **If in doubt, please ask.**

# Privacy & confidentiality

## RESPECT AND PROTECT PRIVACY

We respect the privacy of our employees, customers and business partners. We protect the personal data with which we have been entrusted, and we are committed to process the data in a responsible manner and in accordance with all applicable privacy regulations.

We safeguard individuals' rights to information and appreciate that by being transparent about our privacy practices, we build trust and loyalty. Therefore, we are open and honest about how we collect, use and share the personal data of our employees, business partners and customers.

Privacy is a central pillar in the culture of Haypp Group. Each employee plays an important role in keeping the personal data of our employees, customers and business partners safe. By respecting and protecting privacy, we gain trust, strengthen our brand and create a sustainable business model.

## DATA BREACH RESPONSE

Employees must immediately report any suspected personal data breach to the legal team, including breach of confidentiality, theft or unauthorized access, and loss – whether accidental or by intent. To ensure that no personal data breach takes place undetected, we continuously train our employees on how to identify and report a data breach.

## TRADE SECRETS AND OTHER CONFIDENTIAL INFORMATION

We value an open and honest discourse – both internally and externally with our stakeholders. However, it is important that some information must be kept confidential. Haypp Group's **trade secrets, personal data, and other confidential information are very valuable assets**. A trade secret is information used in connection with Haypp Group's business operations which is not generally known or easily discovered and could be competitively sensitive. Therefore, employees must maintain its confidentiality. Protection of trade secrets and other confidential information plays a vital role in our continued growth and ability to compete. Employees are expected to respect this both during and after termination of employment.

## Privacy principles



All our processing practices comply with the following fundamental privacy principles:

- We ensure that all processing is **legitimate and fair**, and we are **transparent** about our privacy practices and inform individuals about our data collection and uses.
- We only collect personal data for specific and legitimate purposes, and do not process more data than what is necessary for those purposes.
- We ensure that the personal data is **accurate**.
- We delete personal data when it is no longer needed.
- We **protect data** safe from inappropriate use and unauthorized access.

## Did you know...



**Example of confidential information:**

- Customer and supplier lists
- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Marketing strategies and plans
- Other information that could damage the company, its customers or suppliers if disclosed.

# Fighting corruption

We are in the business for the long run and make every effort to have a positive impact in society. Reputation and trust are invaluable and hard-earned assets that we have to protect in order to succeed. We will not take part in any action or transaction that may be deemed a 'grey area' since will damage our reputation and may contravene the law.

We have zero-tolerance towards all forms of corruption. It is unacceptable to offer, give or receive gifts, payments or other benefits to influence , or even appear to influence, any business decision. We do not attempt to influence the judgement or behaviour of a person in a position of trust by paying a bribe or kickback. This applies to people in government and in private business. We do not permit facilitation payments to government officials or private business in order to secure or speed up routine actions.

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. We are committed to winning business only on the merits of our products, services and people and we comply with all legal requirements in respect to giving and receiving gifts and entertainment.

As a company we do not make political contributions. Employees are free to support any political party or entity on a personal level. However this must be kept separate from company business. There are specific rules governing appropriate conduct in dealing with federal, state, local or foreign government officials. These rules differ from the rules for dealing with nongovernmental entities.

The company may make charitable contributions to causes and organisations that are not politically linked. Employees should check with the legal department before making any charitable contributions on behalf of the company.

**Always comply with the law, regarding gifts and other benefits.**

## These are the rules we follow:

- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships.
- Never give or accept a gift or service if it compromises you or could appear to compromise you. This does not include occasional, reasonable business entertainment or gifts of nominal value.
- Never accept gifts or entertainment that are illegal, immoral or would reflect negatively on the company.
- Never accept cash, cash equivalents, stocks or other securities.
- Select third parties carefully and monitor them continuously to ensure they comply with the company's anti-bribery policies.
- Keep accurate books and records at all times and ensure that funds are not being used for bribery or facilitation payments.
- Refuse any offer or request for an unlawful payment and report the incident to the legal department.
- Never offer or provide government employees or governments with any gift, gratuity or item of value, including meals or travel, unless pre-approved by the legal department.
- If you intend to give or receive, or have given or received any gift, payment or other benefit that is more than nominal in value and if you believe such a gift, payment or other benefit was offered in an attempt to influence a business decision, you must contact the Legal department.
- If you are offered lunch or offer a lunch in good faith, please ensure that all persons present pay for themselves, to avoid violating corruption laws.
- When in doubt check with the legal department.

# Finance and Accounting

## ACCURATE BOOKS AND RECORDS

We are legally required to record the financial position of our Company and the results of its operation in accordance with generally accepted accounting principles. Company policy, as well as the law, requires Haypp Group to **maintain books, records and accounts that accurately and fairly reflect the nature of the business transactions** and the disposition of Company assets.

All documents, databases, voice messages, mobile device messages, computer documents, files and photos are classified as part of these records. Employees are required to:

- Maintain records and protect their integrity for as long as required.
- Maintain appropriate record keeping systems to retain and file any records required for business, legal, financial, research or archival purposes .
- Dispose of such records according to the company's records retention and disposition policy.
- Employees should never destroy documents in response to, or in anticipation of, an investigation or audit.

## MONEY LAUNDERING

We comply with anti-money laundering legislation. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin. Employees must never knowingly facilitate money laundering or terrorist financing and must take steps to prevent inadvertent use of the company's business activities for these purposes.

Employees are required to immediately report any unusual or suspicious activities or transactions such as:

- Attempted payments in cash or from an unusual financing source.
- Arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer.
- Unusually complex deals that don't reflect a real business purpose.
- Attempts to evade record-keeping or reporting requirements.

## PROTECT ASSETS

Company assets, facilities or services must be used only for lawful, proper and authorized purposes. The theft of money, property or services is strictly prohibited. The use of Haypp Group equipment, systems, facilities, corporate credit cards and supplies must be related to your job at Haypp Group or for purposes authorized by management. You are personally responsible not only for protecting the property entrusted to you by the Company, but also for helping to protect the Company's assets in general. You should be alert to any situations or incidents that could lead to the loss, misuse or theft of Company property and you must report all such situations to your manager as soon as they come to your attention. Only certain Company employees have the authority to make commitments affecting the Company's assets. Unless properly authorized, you should not make commitments affecting Company assets. If you have questions or need clarification, you should contact Haypp Group's Chief Financial Officer (CFO).

Haypp Group's IT resources must be used responsibly. Haypp Group's IT resources include all current and future equipment, software and services that collect, store, communicate and process data owned, leased or provided by Haypp Group. The company expects its employees to help it safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the company. Cyber-security training is provided to all employees to ensure compliance with computer security policies. The company safeguards against inappropriate access by individuals or groups untrained in correct company policies or procedures. The company does not use software for which it does not have a license. See the **IT Policy** for further guidance.

## INSIDER TRADING

Employees may learn information about the company's associates, clients, business partners or other companies that is not publicly available. It is illegal for any individual to use information obtained in this way for personal gain or to share it with others. Employees are required to report suspected insider trading immediately to the legal department or via the anonymous whistleblower function.

Employees are prohibited from:

- Buying or selling securities based on knowledge that is not already in the public domain and which is gained in the course of business.
- Providing information or tips or encouraging another person to buy or sell securities based on inside information.

# Legal Compliance

## COMPLY WITH ALL APPLICABLE LAWS

At Haypp Group we take pride in being fully compliant with applicable laws and regulations. This differs us from many competitors and is key to the success and sustainability of Haypp Group.

However, simply following the law is not enough, we hold ourselves to the highest applicable standards relevant to our business. We also require the highest ethical conduct from all our employees; no employee is permitted to violate any law or regulations or applicable standards.

## REGULATED PRODUCTS


Tobacco and nicotine products are often governed by specific regulations with the objective to protect consumers. The content of those rules varies between countries and regions. So, what is legal in one country, state or region, may be illegal in another. However, the regulations typically include three key aspects:

- **License to sell**, with the consequence that any failure to comply with applicable legislation may result in the suspension or revocation of our license.
- **Age verification** where we are obligated to ensure that the customer is old enough to purchase the products.
- **Marketing restrictions**, such as targeting youth or using certain claims.

## Did you know...



- The sale of snus is prohibited in the EU, with the sole exception of Sweden. Since Norway and Switzerland are not EU members, the ban on snus sales does not apply in those countries.
- While snus is governed by EU tobacco laws, there is no EU legislation targeting tobacco-free nicotine pouches as of yet.
- In the US, tobacco and nicotine products are regulated both on a federal and on state level. The legal landscape is complex, including ban on online sales and/or flavour bans in several states.



**We always comply with the letter of the law.  
Whenever in doubt, consult with the legal  
team before you act.**



# Ethical treatment of stakeholders

## DEAL ETHICALLY WITH SUPPLIERS, CUSTOMERS, CONSUMERS AND OTHER THIRD PARTIES

Honest and ethical dealing with suppliers, customers, consumers and other third parties is essential to sound, lasting business relationships. We give all potential third parties fair and equal consideration. Vendor selection decisions are based on objective criteria such as price and quality, as well as reliability and integrity. In addition, we extend no personal favors to third parties on prices, promotional allowances, marketing assistance or the like. [See more on how to earn trust here.](#)

## ...and compete in a fair way

### COMPLY WITH COMPETITION LAWS

Haypp Group and its employees must comply fully with competition laws that apply in every country, where we conduct business. The purpose of these laws is to protect consumers and other companies and to ensure that companies compete fairly. Competition includes offering lower prices, more innovative products and better service and that companies do not interfere with the market forces of supply and demand.



### Compete fairly

- Communicate the company's products and services in a manner that is fair and accurate, and that discloses all relevant information.
- Remember our fair competition policy and remain aware of the consequences of any violation of policies or laws governing fair competition
- Consult the company's legal department before engaging in any new practice that may affect fair competition.
- Refrain from price fixing, bid rigging, and any other anti-competitive activities.
- Use only publicly available information to understand business, customers, competitors, business partners, technology trends, and regulatory proposals and developments.
- Advise your manager immediately of possible violations of fair competition practices.
- If you have any questions, ask your manager or the legal department.

# Customer satisfaction

## OUTSTANDING CUSTOMER SERVICE

Our success depends on consumer satisfaction, trust and goodwill. We recognize the importance of anticipating and responding to consumer needs and preferences. We believe that the customer's opinions, concerns and inquiries about our products and services are a vital source of information to make Haypp even better. Consumer needs are constantly changing, so we must constantly listen to what people want. When a consumer expresses dissatisfaction, our team addresses the problem quickly, politely and fairly and makes every reasonable effort to maintain or regain the consumer's goodwill.

## CONSUMER HEALTH

Consumer health is a matter of concern for all industry players who manufacture or supply products in daily commodity trade, especially products containing chemicals or additives. At HAYPP Group this means working with consumer health, respecting and enforcing age restrictions, being transparent about product information and correctly labeling products so that consumers can make informed choices.

In addition, we offer non-nicotine alternatives for customers that wish to reduce their nicotine use or to quit altogether. We support and encourage initiatives that promote healthy user habits including sports and other activities that contribute to a healthy and balanced life. This is in line with the expectations from our stakeholders and our own values.



## INFORMATION & AWARENESS

We aim to provide stellar service and information about our products and their impact on health, the natural environment and society. We always represent our consumers in the public conversation.

We believe we can be a worldwide provider of essential health related insights to potentially save millions of lives every year.



## NICOTINE AND MINORS

Haypp Group has a **no nicotine rule for those under 18**. It firmly states that all tobacco and nicotine products will only be sold to adults of legal tobacco age in each market and who are 18 years of age or over. **We do not direct any marketing, advertising or promotion of products containing nicotine to individuals under the age of 18.**

Samples are only provided to adult consumers. Haypp Group advertises and promotes products and services in a manner consistent with applicable marketing laws and regulations or of high ethical standards if no such regulation is in place. We give truthful and correct information about all the products we offer.

If you feel that we are not fulfilling our obligations to our customers, please speak up. It is everyone's responsibility to keep our business on the right track.





# Environmental impact

A healthy and happy planet is fundamental to a healthy society. We contribute to a healthy environment in any way we can based on our business impact and our sphere of influence. We have a commitment to **minimizing the environmental impact of all of our activities used to deliver services to our customers**. We are committed to operating in an environmentally responsible manner, from the provision of products and services, to the operation of our offices and warehouses, selection of suppliers and other business activities. Haypp Group complies with all applicable environmental laws and regulations and we have our own self-imposed commitments to sustainable practices and environmental protection. We expect everyone at Haypp to consider and care for the environment whilst working for Haypp Group.

## INNOVATION FOR SUSTAINABLE GROWTH

We are constantly looking for new smoke and tobacco-free products with a balanced nicotine content. We focus on converting smokers to tobacco-free nicotine pouches and we are convinced that with our growth in the global market for nicotine products, we are building a healthier, happier consumer base.

Haypp's strive to provide a product range in line with our high sustainability standard. The products we sell need to meet our requirements regarding; sustainable farming, energy efficiency, sustainable transport, safe ingredients and efficient packaging. This includes lowering the need and use of fossil material and fuel as well as energy consumption in the whole value-chain of the products and services Haypp offers.

We are one of the global leaders in consumer insight in our field. We hope that this can lead product development from a market perspective.



## Tips on what we can do as individuals:

- Travel less by air and car, take the train and use your body more – take the bike to work.
- Inspire people to quit smoking.
- Lower your meat consumption and eat more legumes.
- Eat everything on your plate and particularly more greens and colourful food.
- Eat less processed food and try to cook more, especially with leftovers – don't waste food.
- Try a shopping free month – buy nothing new, only vintage.
- Lower the heat one degree and wear more clothes.
- Turn off the light when you leave the room and switch to LED-lighting.
- Invest in a new fridge or freezer that use less energy.
- Invest in solar panels and produce your own energy.
- Wash your clothes in cooler water – 30 degrees instead of 60 will cut the energy use in half.



# Impact on society

We are dedicated to making a positive impact on society. We know that our business can help reduce the number of smokers in the world and in this way we can contribute to longer and healthier lives for many. But our commitment does not end there.

We understand that it is our responsibility to society to be a fair and serious corporate citizen, this encompasses our entire supply chain. This includes not only the products and services provided, but also human rights, ethics and social practices for our company and its suppliers.

Our goal is to build partnerships with like-minded organizations by actively seeking business partners who are the most environmentally and labour-friendly. Our supplier code reflects our work practice policy, in accordance with international labour rights guidelines set out by the ILO. We make it clear that none of our suppliers may violate human rights, engage in forced labor or child labor.

We also recognize our responsibility to engage and participate in our local communities, including our online communities. We want to support local business and talent by sourcing local services and products when possible.

## Overall statement on Sustainability and Accountability

Haypp Group has a strong to commitment to Sustainability and Ethical behaviour. This is an integral part of our daily operations and an important facet of our business development. Our strategic focus areas for sustainability are:

- Consumer and public health,
- Consumer and market insights related to tobacco and nicotine consumption
- Ethical behaviour
- Sustainable growth and product development
- Workplace



We follow the guidelines of ISO 26000 to maximize our contribution to Sustainable development and report our progress according to the International framework GRI and the Sustainable Development Goals. Our strategy is validated through Stakeholder dialogue and revised every year.

We recognize United Nations Sustainable Development Goals – in Agenda 2030 and contribute in particular to **Goals 3, 12 and 17**. To maximize our contribution to sustainable development we follow the guidelines of the international standard for sustainable business conduct ISO 26000, and report our progress according to the international framework for reporting – GRI Standards.

# How to report misconduct

## SPEAKING UP

As employees of Haypp Group, our personal conduct must reflect the Group's commitment to high ethical standards. Upholding these standards is everyone's responsibility.

## COMMUNICATION AND DISCLOSURE ARE ESSENTIAL

When commencing employment with Haypp Group, each individual becomes accountable for their compliance with the standards of conduct, laws and regulations, the employee handbook prepared by our Company and its subsidiaries. Managers are responsible for communicating these standards to those they work with, ensuring that they understand and abide by them, and creating a climate in which people can discuss ethical and legal issues freely.

## WE HAVE INTERNAL RESOURCES TO ASSIST YOU IF YOU NEED GUIDANCE

The Code cannot provide definitive answers to all questions. We must ultimately rely on each person's good sense of what is required to adhere to the Company's high standards, including a sense of when it is proper to seek guidance on the appropriate course of action. If you have questions regarding any of the content discussed in the Code or if you are in doubt about the best course of action in a particular situation, please seek guidance from your manager or the legal department.

## NO RETALIATION

We have a policy of non-retaliation against those who report concerns and breaches of the Code. This is vital for the best interests and long-term wellbeing of our employees, our customers and the company at large. The Group asks for a commitment from everyone from the very top level and throughout the company to ensure that there is no retaliation for reporting concerns of any kind. This non-retaliation policy means that no one will be punished in any way for reporting ethical concerns. They should rather be praised for taking responsibility and having the courage and commitment to speak up.

## WHERE DO I GO IF I NEED HELP OR WISH TO REPORT A CONCERN?

The company encourages all employees to ask questions and raise issues without fear of retaliation. The Company takes all reports seriously and will investigate them thoroughly. Employees must report suspected unethical, illegal or suspicious behaviour immediately. The company does not tolerate retaliation against anyone who makes a report in good faith of suspected misconduct or otherwise assists with an investigation or audit.

### The Legal Counsel

Contact Haypp Group's legal counsel with any compliance questions or to obtain advice or assistance with the interpretation of laws, regulations or company policies including the Code.

### Your manager or a member of our management team

Speak with your manager or a member of Haypp Group's management team to discuss ethical concerns or questions. If they are unable to assist you, they will refer you to the appropriate resource.

### The anonymous Whistleblower function

If you have concerns and wish to remain completely anonymous, please use the [Online Whistleblower Function](#) to make your report.

Employees who report their concerns in good faith can not be subjected to any adverse employment action including:

- Unfair dismissal, demotion or suspension
- Unfair denial of a promotion, transfer or removal of any other employment benefit
- Bullying and harassment, either in person or online
- Exclusionary behaviour
- Any other behaviour that singles out the person unfairly

If you experience retaliation after having raised a concern, please report it to your manager or the CEO.

# Code of Conduct Acknowledgement

I certify that I have read and understood the Code of Conduct and acknowledge that:

- I have had the opportunity to clarify any unclear aspects of the Code.
- I agree to abide by the principles in the Code of Conduct.
- I agree to report any violations of the Code to the company.
- I agree to cooperate in any investigations concerning violations of this Code.

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Place, date

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Signature

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Name