

HAYPP GROUP AB

BUSINESS PARTNER CODE OF CONDUCT

HAYPP GROUP

1. BACKGROUND

Haypp Group AB (publ) and its group companies (“Haypp Group”) are determined to conduct business in a sustainable manner. We expect our contracting parties, manufacturers and suppliers (“Business Partners”) to share this vision.

This Code of Conduct specifies what Haypp Group demand of their Business Partners in relation to key sustainability aspects. We expect our Business Partners to comply with this Code of Conduct and that they demand the same compliance from their sub-contractors.

As a fundamental starting point, we require all Business Partners to comply with applicable local, national and international laws and regulations in the territories and areas in which they operate, manufacture and sell their tobacco-, nicotine- or and/or other products subject to the agreement with Haypp Group (“Products”). When there is a discrepancy between such laws and regulations on one hand and this Code of Conduct on the other, the strictest requirements shall be followed.

Haypp Group reserves the right to verify the Business Partner’s compliance with this Code of Conduct, to which the Business Partner shall provide all reasonable cooperation. The Business Partner is also expected to report any actual or suspected breaches of this Code of Conduct to the contact person within Haypp Group, or through the anonymous [Whistleblowing Service](#)¹.

Haypp Group reserves the right to terminate business relationships with Business Partners who do not comply with this Code of Conduct.

Naturally, a Code of Conduct cannot be exhaustive, and Haypp Group therefore trust that all Business Partners, at all times, use their good judgment. In case of guidance or questions concerning this Code of Conduct, the Business Partner should consult its contact person within Haypp Group as soon as possible.

2. PRODUCT COMPLIANCE

The Business Partner shall ensure, and to Haypp Group guarantee, that the Products provided by the Business Partner at all times comply with all statutory requirements and industry regulations regarding production, content, packaging, labelling, warning texts and marketing. Haypp Group requires that Business Partners comply with, and fulfil, all relevant laws, regulations and obligations, which include, but are not limited to, the following regulations on local, national and international level (as applicable):

- a) **Rules regarding content:** Relevant laws include, but are not limited to, food legislation, tobacco legislation, nicotine legislation, specific product legislation, as well as industry regulations, advice/regulations from authorities as well as published standards given out by organisations such as ISO, CEN and SIS, e.g. SIS/TS 72:2024.
- b) **Rules regarding manufacturing, presentation, marketing and sales:** Relevant laws and regulations on manufacturing, presentation, marketing and sales, including recommendations by relevant authorities.
- c) **Obligation to provide information:** Relevant laws and regulations might require that those who manufacture or import Products shall notify and report the Products to the relevant authorities.

¹ <https://report.whistleb.com/en/hayppgroup>

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- d) **Labelling requirements:** Relevant rules and regulations on labelling requirements and their placement, including but not limited to health warnings, ingredients, “track and trace”, as well as CLP regulations (classification, labelling and packaging), industry regulations and advice/regulations from authorities.
- e) **Nicotine content and pH-levels:** Nicotine pouches must not have a higher nicotine content than 20 mg per pouch and must not have a higher pH-level than 9.1 or lower pH-level than 5.6.
- f) **Other provisions:** The Products might be governed by a number of laws and regulations that the Business Partner must understand and follow. Each Business Partner must adhere to and at all times comply with relevant regulations, and upon request by Haypp Group supply relevant documentation related to the Products (e.g. certificates of origin) that may be requested from time to time.

3. BUSINESS INTEGRITY

3.1 Bribery and corruption

Haypp Group have zero tolerance against bribery and corruption. This is one of the fundamental principles of our business and we require our Business Partners to share this view. Haypp Group require that the Business Partner at all times complies with relevant laws and regulations that apply in the markets in which the business is conducted, including but not limited to, the antibribery legislation in Chapter 10 of the Swedish Criminal Code, the US Foreign Corrupt Practices Act and the UK Bribery Act. Bribery and other forms of corruption are punishable in both private and public sectors and are prohibited whether committed directly or indirectly through a third party.

3.2 Fair competition and anti-trust

Haypp Group believe in fair competition and abide by applicable competition, anti-trust and fair-trading laws and regulations. We expect our Business Partners to do the same.

3.3 Anti-money laundering and terrorist financing

The Business Partner shall ensure that they do not engage in any activity which would constitute a money laundering or terrorist financing offence.

3.4 Taxes and other fees

The Business Partner undertakes to fulfil and comply with all applicable fiscal/tax obligations, both in relation to direct and indirect taxation. This means, *inter alia*, that the Products that the Business Partner sell to Haypp Group must be final and properly taxed at the time of ownership change, unless other rules and regulations apply.

Tax- and fee obligations that the Business Partner must comply with include, but are not limited to, the following, as applicable:

- a) Excise tax if applicable by local or national law
- b) VAT / Sales tax according to local regulations
- c) Mandatory taxes and fees related to its obligations as an employer

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4. HUMAN RIGHTS AND WORKING ENVIRONMENT

The Business Partner shall ensure, and to Haypp Group guarantee, that they do not violate, or contribute to violation of, human rights or labour rights. This means that the Business Partner, *inter alia*, should ensure that their operations comply with fundamental human rights of others (as affirmed by international standards such as the Universal Declaration of Human Rights) and that they respect the rights of their workers (as stipulated by the ILO fundamental conventions). This means compliance with the following at the workplace:

- Ensure equality and no discrimination
- Protect health and safety
- Respect freedom of association
- Fair wages and benefits
- No child labour
- No modern slavery or exploitation of labour
- Fair working hours

5. ENVIRONMENTAL SUSTAINABILITY

Haypp Group is actively trying to contribute to the global environment in a positive way. As we are primarily a sales-based organisation, product development is something we engage in together with our Business Partners. Haypp Group brings consumer and market insight to the table and encourages sustainable and climate innovative initiatives from our Business Partners which can create a more sustainable range of products and services. We expect our Business Partners to identify, understand and actively work towards avoiding, minimizing and mitigating their associated negative impacts on the environment. We encourage our Business Partners to uphold high ambitions in relation to environmental and climate innovations, and expect them to follow industry standards and relevant international guidelines for their environmental work.

ACKNOWLEDGEMENT

On behalf of the company I hereby acknowledge and agree to abide by this Code of Conduct, and will ensure that all employers, directors, agents, representatives and sub-contractors are aware of and will abide by such policies and principles during the performance and administration of all agreements entered into with Haypp Group.

Authorized Signatory Name: _____

Signature: _____

Job Title: _____

Company: _____

Date: _____