

Code of Conduct

HAYPP GROUP

Introduction

Message from our CEO

We are transforming the industry and are incredibly proud of the success and momentum we've built. Our growth has been strong, and we've expanded into new markets around the world.

However, success brings responsibility and for us, that responsibility is even greater because of the industry we're in and the products we offer. We know we're held to a higher standard and operate under a heightened level of scrutiny, and we take that very seriously. Our leadership position and the nature of our business demand that we conduct ourselves with integrity and stay fully aligned with all applicable laws and regulations. That is non-negotiable.

It is important to ensure that we run our business the right way, with integrity and a long-term mindset. That is why we have aligned our business model with key sustainability practices, creating what we call our Sustainable Business Model. At the core of it is a strong commitment to ethical business practices.

We hold ourselves to high standards when it comes to ethics and compliance – and we are proud to lead by example. This isn't just about our company; it's about influencing the broader industry for the better. We have always been pioneers in what we do, and with our Code of Conduct we will continue setting a positive example.

Our Code of Conduct is more than a rulebook, it's our compass. It keeps us grounded in our values and guides us in how we operate every day. It defines the principles that shape who we are and how we do business.

Gavin O'Dowd
CEO



Our Code of Conduct

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Our Commitment

We act responsibly

We comply with applicable laws, this Code of Conduct, and our internal policies. We take personal responsibility for understanding and upholding these expectations.

Application

Our Code of Conduct is one of the most important documents you will read during your time at Haypp Group. It reflects our commitment to conducting business professionally, respectfully, and with integrity.

The Code of Conduct applies to Haypp Group AB (publ) and all its subsidiaries (collectively referred to as “Haypp”, “Haypp Group” or the “company”). It must be followed by all employees and others performing work on behalf of Haypp. Any violation of this Code of Conduct may result in disciplinary action, up to and including termination of employment.

We are committed to complying with all applicable laws and regulations in every market where we operate. In addition, we are required to follow this Code of Conduct, as well as all internal policies, instructions, and procedures issued within Haypp Group. If there is ever a conflict between legal requirements and internal rules, we will follow the stricter standard.

We also expect our Business Partners to share and uphold our values and ethical standards. For that reason, we’ve developed a separate Business Partner Code of Conduct that applies to them.

Sustainability report

We recognize that the standards set out in this Code of Conduct are high—and we hold ourselves accountable to them. Each year, we assess how well we meet the principles outlined here. This includes publishing relevant KPIs and progress updates in our annual Sustainability Report.

Responsibility

All employees are expected to understand and comply with the Code of Conduct, as well as all related policies, instructions, and procedures within Haypp Group. When required, employees must also complete mandatory Code of Conduct training. Managers play a critical role in setting the tone. They are expected to lead by example, guide their teams in applying the Code of Conduct, encourage a speak-up culture, and take action to uphold and improve our standards.

If you have questions about this Code of Conduct or are unsure how to act in a specific situation, speak with your manager or contact the Compliance Function. Guidance and support is always available.

We speak up & listen up

Those who speak up deserve recognition, not just for their honesty, but for the courage it takes to protect what we stand for.

A foundation of a sound corporate culture

Speaking up when something doesn't feel right is one of the most important things we can do. It's a sign of integrity, courage, and care, not just for our company, but for each other.

Raising concerns helps prevent misconduct and builds the foundation for a strong, transparent, and responsible culture.

Just as important as speaking up, is listening. When someone raises a concern, we all have a responsibility to listen, especially those in leadership roles. That's what we mean by "listen up."

At Haypp Group, we take every compliance concern seriously and will follow up and investigate appropriately.

Speak up and raise compliance concerns

There are several ways of speaking up and raising compliance concerns. As a first step, we recommend that employees turn to their manager, People & Culture Function or the Compliance Function. If you prefer to raise a concern anonymously, you can use our Whistleblower Function or our Speak Up Channel.

The Whistleblower Function and the Speak Up Channel

Our Whistleblower Function is managed by an independent third party. The Speak Up Channel is a supplement to the Whistleblower Function and is handled by an internal Haypp Team. Both channels allow you to raise concerns securely, confidentially, and completely anonymously if you choose.

No retaliation

We do not tolerate retaliation against anyone who speaks up in good faith. No one will face punishment or negative consequences for reporting a suspected violation of this Code of Conduct, internal policies, or any applicable laws or regulations. On the contrary—raising concerns should be recognized and appreciated since it takes courage and a strong sense of responsibility to speak up.

Did you know…

…that in order to create an environment where employees feel safe to speak up, we must first ensure that we take our responsibility of "listen up"? We all have a responsibility to listen up, not only managers. This means that we need to take cases of "speak up" and compliance concerns seriously and – to the full extent possible – support our colleagues in reporting a concern.

You are expected to:

- Speak up and raise a compliance concern when something doesn't feel right.
- Encourage colleagues to speak up and raise compliance concerns to their manager, the People & Culture Function, the Compliance Function or the anonymous Whistleblower Function or our Speak Up Channel.
- Listen up, meaning that you need to take cases of speak up and compliance concerns seriously.
- If you are a manager, you are required to create an atmosphere within your team where employees feel safe to speak up.

More information

Whistleblower Function
Whistleblowing Privacy Notice
Whistleblowing Policy
Speak Up Channel

We serve our customers

Our success is built on customer satisfaction, trust, and long-term goodwill.

Customer focus

Our customers are at the center of everything we do. As a consumer-driven e-commerce company specializing in oral nicotine, vape and tobacco products, our success depends on customer satisfaction, trust, and long-term goodwill. We actively listen to our customers, recognizing that their feedback, preferences, and questions help us improve our products, services, and experience. Their input is a vital source of insight and an opportunity to continuously evolve.

In many ways, we are not only serving our customers; we also represent them and the product category in public debates. We engage in political discussions to ensure that our customers' needs are adhered to, and publicly express views that benefit our customers. We do this in our own name, while remaining politically non-partisan.

Delivering quality customer experience

We demonstrate our commitment to customers by supporting the development of high-quality products, maintaining a curated offering of trusted brands, and applying strict standards across our operations. We are committed to delivering products of the highest quality. To uphold this commitment, we require independent laboratory testing of the products we sell, verifying that they meet rigorous quality and sustainability standards. This testing reflects the expectations our customers rightly hold us to and deserve.

Legal Age Access Only

We take our responsibility seriously when it comes to preventing underage access. Our products are strictly intended for adult consumers, and we implement robust age and identity verification measures to ensure compliance with all legal requirements. We do not target minors with advertising, marketing, or promotional efforts, nor do we interact with underage individuals in any way.

Did you know…

…the legal age to purchase tobacco and nicotine products varies between countries? We must always be mindful of local restrictions in the markets we operate.

… we routinely test nicotine pouches before listing them on site and the testing is performed by an independent, accredited Swedish lab. The results are used as part of an internal review process to identify whether a product aligns with declared specifications and relevant market standards.

You are expected to:

- Act in a way that ensures customer satisfaction, trust and goodwill.
- Ensure that only people of legal age can access our products.
- Not direct any marketing, advertising, or promotional activity toward individuals under the legal age.

More information

Haypp's Pouch Testing Standards

We have a clear sustainability ambition

Sustainability is a central part of our business strategy, shaping how we operate through our Sustainable Business Model.

Sustainability at the core

At Haypp Group, sustainability is a key part of how we do business, not a separate initiative. It's embedded in our business model and addressed with the same strategic focus as any other core priority.

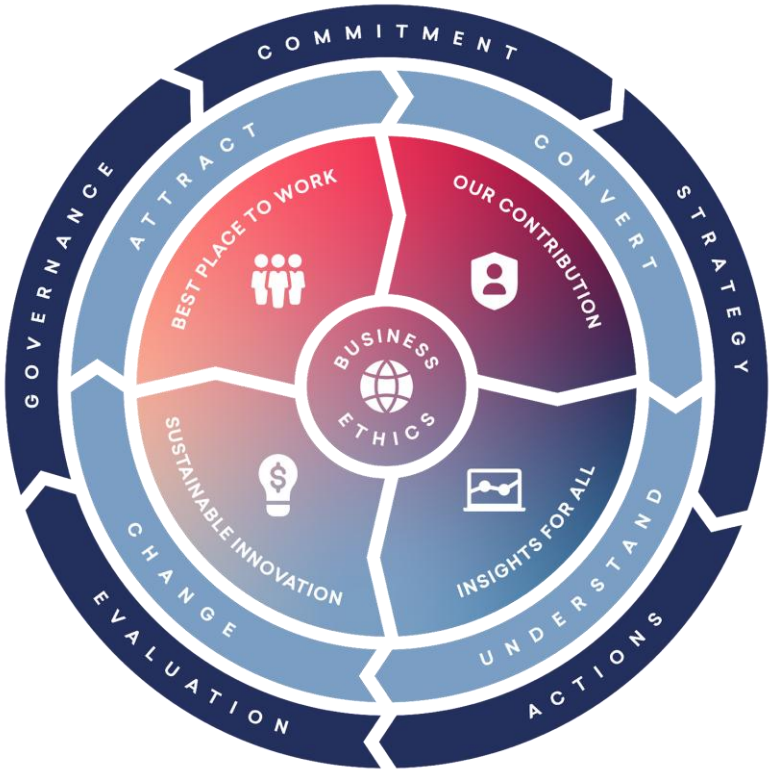
Our Sustainable Business Model

Our integrated approach forms the foundation of what we call our Sustainable Business Model. The model is built around five strategic sustainability areas, designed to support both operational excellence and long-term impact. These areas are business ethics, our contribution, insights for all, sustainable innovation and best place to work.
As an industry leader, we recognize our opportunity and responsibility to contribute to a more sustainable future. Our ambition is to be recognized as a frontrunner in sustainable e-commerce practices. This commitment is reflected in the way we operate, the decisions we make, and the way we engage employees at every level.

We believe that sustainability is everyone's responsibility. Every employee is encouraged to contribute to our sustainability goals in their daily work and to speak up when they see opportunities to improve. At Haypp Group, sustainability and business performance go hand in hand.

A systematic and accountable approach

We take our sustainability responsibilities seriously and follow internationally recognized guidelines in how we track and report progress. Each year, we share our achievements and goals in our publicly available Sustainability Report, which includes relevant data and performance across ESG areas.



More information

Sustainability Haypp Group

Sustainability Policy

Our People & Workplace

We live by our values

Our values define who we are and how we work together. They reflect the behaviours that make us unique and help drive our collective success.

We live by four core values that guide how we collaborate, lead, and grow. These values were shaped through a bottom-up process where employees across the company helped describe what defines us, and what we want to preserve as we move forward. By living these values, we ensure that every team member contributes to maintaining the culture that makes Haypp special. Below, we outline the key behaviours behind each value.

Just Be Kind

- We greet each other with a smile and are supportive, always.
- We keep a friendly and constructive tone to ensure that Haypp remains an inclusive space where we can get our best work done.
- We show our appreciation because what's the point in hiding it?

We Team Up

- We accomplish our goals together with a cross-functional approach.
- We are ready to lend a hand if someone needs it.
- We seek to involve people with diverse opinions, interests and capabilities in all contexts.

Innovation Drives Us

- We welcome everyone's input and recognize that game-changing ideas often come from unexpected places.
- We push the boundaries and explore new ways to help Haypp grow, knowing that our colleagues will always have our back.
- We recognize that mistakes are part of the process and can fuel creativity.

We Go The Extra Mile

- We are not afraid to take ownership.
- We are proactive and always push forward.
- We set clear, ambitious targets and celebrate when we reach them.



We ensure a safe working environment

We are committed to providing a safe, healthy, and supportive work environment. We do everything we can to keep you safe and well, and we expect you to do the same for yourself and those working with or alongside you. Safety is a shared responsibility.

One Policy, several Instructions and Handbooks

Haypp has a global Occupational Health and Safety Policy applicable to the whole Group, supplemented with local OHS Instructions and Employee Handbooks. This approach to Occupational Health and Safety ensures global and local compliance, as well as a safe and positive work environment for all employees.

A workplace free from harassment

Everyone has the right to work in an environment free from violence, all forms of harassment, and intimidation. Haypp Group maintains a zero-tolerance policy toward any form of violence, harassment, intimidation or other disrespectful behavior.

All employees are expected to treat colleagues, customers, business partners, and all stakeholders with dignity and respect, at all times.

Safe and fair working conditions

We are committed to ensuring just, safe, and favourable working conditions across all areas of our business. Our goal is to maintain a safe workplace resulting in zero work-related injuries, illnesses, or fatalities. We strive to create an environment where everyone can thrive physically, mentally, and emotionally.

Compliance with applicable laws and regulations

We comply with all applicable occupational health and safety laws, regulations, and standards whether in our offices, warehouses, or other facilities. All employees are also expected to follow our policies, instructions and handbooks, and to report any unsafe conditions, incidents, or concerns immediately. We track and report on our occupational health and safety performance annually in our Sustainability Report.

Did you know…

…that harassment includes but is not limited to the following:

- Violent, hostile, humiliating actions either in physical, oral or written form.
- Offensive remarks, bullying, jokes, images or name-calling.
- Unwanted sexual advances, invitations or comments, or other invasions of private or personal space.

… that discrimination and/or harassment include conduct linked to gender, ethnicity, religion, sexual orientation, disability, or, age depending on jurisdiction.

You are expected to:

- Promote a workplace free from all form of harassment.
- Work responsibly and safely by always complying with our policies, instructions, handbooks and other safety rules.
- Contribute to a psychologically safe workplace that promotes physical health, safety and wellbeing for all.
- Speak up and raise your concern if you identify any health or safety risks.

More information

Occupational Health & Safety Policy
OHS Instructions
Employee Handbooks

Our Business

We have zero-tolerance for bribery and corruption

Integrity and transparency are at the core of how we do business.

Conducting business with integrity

We enforce a strict zero-tolerance policy against all forms of bribery and corruption. Offering, receiving, or giving gifts, payments, or any other benefit with the intent or even the appearance of influencing a business decision or securing an improper advantage is strictly prohibited. We also reject facilitation payments, which are unofficial payments made to expedite routine government actions, such as obtaining visas, licenses, or permits. These actions are not only unethical but also criminal, exposing both the company and the individuals involved to penalties, including fines and imprisonment.

Political and charitable contributions

We do not fund political parties or make political donations.

While employees are free to engage in political activities on a personal level, these must remain separate from company affairs. The Company may support charitable initiatives and donate to organizations, but this require prior approval from the Compliance Function.

Gifts, entertainment and hospitality

While modest gifts, entertainment and hospitality – such as paying for a business meal with a business partner – may be appropriate and legitimate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them which can be problematic. Therefore, you need to be modest and restrictive with any type of gift, hospitality and entertainment - whether offered to you, or by you. The Travel & Expense Instruction contains guidance on these matters, which you are always required to comply with.

Did you know…

…that bribery and corruption are illegal and prohibited in both the private and public sector. However, more stringent rules apply in relation to public officials, which is why gifts, entertainment and hospitality should not be offered to this category unless prior approval has been received from the Compliance Function. **Public officials** are members, employees or representatives of:

- Governments – whether national, regional or local
- State-owned or state-controlled companies
- The military, police and courts
- Political parties, candidates and politically exposed persons
- Public international organizations and royal families

You are expected to:

- Be modest, restrictive and cautious in relation to gifts, entertainment and hospitality and contact the Compliance Function for guidance by sending an email explaining the situation to compliance@hayppgroup.com.
- Read, understand and comply with the Travel & Entertainment Instruction

More information

Travel & Entertainment Instruction

We avoid conflicts of interest

Perception matters. Even if you believe there is no issue, if a situation could be viewed by others as a conflict of interest, it must be disclosed.

Understanding conflicts of interest

As employees, we are expected to act in the best interests of Haypp Group at all times. However, in some situations, our personal or private interest could be (or could be perceived to be) in conflict with our professional duties and responsibilities. When these conflicts occur, there is a risk that our objectivity, integrity, independence or professional judgement may be compromised. This is called a conflict of interest.

Examples of conflicts of interest

While every situation is unique, here are a few scenarios that could present a conflict of interest:

- Conducting business on behalf of Haypp Group with companies owned or controlled by you, relatives, or close friends.
- Hiring, managing, or influencing employment decisions involving someone you are related to or have a close personal relationship with.
- Taking on outside work—such as freelance or part-time jobs—with a competitor or business partner of Haypp Group.

These examples are not exhaustive. You can find more information and guidance in our Conflicts of Interest Instruction, which you are required to read, understand and comply with at all times.

Your duty to report

Having a conflict of interest may not be wrong in and of itself. What matters is how you handle it. If you recognize a conflict – or even suspect one – you are required to disclose it promptly to the Compliance Function at compliance@hayppgroup.com.

Did you know…

…that you can mitigate a conflict of interest situation by reporting it to the Compliance Function, following the advice given, and removing yourself from a decision that involves the subject of conflict. For example, you may wish to suggest that your sister or brother is the best person for a job but let someone else – who does not have a conflict of interest – make the decision on whether or not to hire.

You are expected to:

- Avoid conflict of interest situations, to the extent possible.
- Remember that perception matters, meaning that if a situation might be perceived as a conflict of interest by others, you need to report it.
- Report a conflict of interest situation as soon as you become aware of it to compliance@hayppgroup.com
- Read, understand and adhere to the Conflicts of Interest Instruction.

More information

Conflicts of Interest Instruction

We communicate responsibly

We are committed to ensuring that all external communication is accurate, consistent, and reflects our values.

External communication

To safeguard our brand and reputation, only the Head of Legal & External Affairs, specific members of the management team, and other authorized personnel are permitted to communicate on behalf of Haypp Group. If you are contacted by an external party, such as a journalist or industry representative, do not respond. Instead, forward the inquiry to our Head of Legal & External Affairs, who will handle it appropriately. Similarly, only authorized individuals may post on behalf of Haypp Group across official communication channels, including social media, press releases, and external publications. Further guidance can be found in our Communication Policy and Insider Policy.

Employee use of social media

We encourage employees to engage with and follow Haypp Group on social media and employees are welcome to share content officially published by the company. However, employees should not post personal commentary or content about Haypp Group's business or internal affairs on their private social media accounts.

Protecting our brand and reputation

Our brand and reputation are among our most valuable assets, and every employee plays a role in protecting them. Whether online or offline, we are all ambassadors of Haypp Group and must act accordingly.

Even though your personal social media accounts are your own, the content you share reflects on you, and potentially on the company. We expect all employees to exercise sound judgment and refrain from posting anything that could be seen as offensive, abusive, unlawful, or otherwise damaging to Haypp Group's reputation or contrary to the terms of social media platforms.



Did you know…

…that Haypp Group is a publicly listed company and is therefore obliged to follow mandatory regulations on information disclosure. Most of the information you gain through your employment is of a confidential nature which cannot be shared externally.



You are expected to:

- Never engage in external communication if not specifically authorized to do so.
- Immediately refer external request to our Head of Legal & External Affairs.
- Use your sound judgement and follow applicable laws and rules on social media sites – even when operating your private accounts.
- Never do anything that might harm our reputation, brand or commercial interest.

More information

Communication Policy

Insider Policy

We comply with the regulatory framework

Compliance with the regulatory framework is non-negotiable.

Navigating a complex regulatory landscape
As emphasized throughout this Code of Conduct, Haypp Group is firmly committed to complying with all relevant laws, regulations, and official guidelines in every market where we operate. However, we recognize that the regulatory landscape surrounding our products is complex, and we must navigate it with care and precision.

Tobacco and nicotine products are subject to detailed and often restrictive regulations designed to protect consumers. These rules vary significantly across countries, regions, and even states. What may be lawful in one jurisdiction could be strictly prohibited in another. Generally, the regulatory framework governing our products focuses on three critical areas:

- **Licensing requirements:** We must hold valid licenses to sell our products.
- **Age verification:** We have a legal and ethical obligation to ensure our products are only available to individuals who meet the legal age requirements in each jurisdiction.
- **Marketing restrictions:** Strict rules limit how we market our products and prohibit content that targets minors or uses misleading health claims.

Guidance
We understand this legal landscape is complex, which is why employees must complete mandatory training. This training is designed to equip you with the knowledge needed to stay compliant in your role.

If you ever encounter uncertainty, or if you are unsure how a regulation applies to your work, it is your responsibility to seek advice. Always reach out to the Legal Function or Compliance Function for clarification and support.

Did you know…

…that 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 does not apply in these countries.

…that in the US, tobacco and nicotine products are regulated on federal, state, county, and local levels. The legal landscape is complex, including a ban on online sales and/or flavour bans in several states.

You are expected to:

- Comply with the regulatory framework governing our products.
- Never engage with underaged consumers.
- Attend the specific training on regulatory framework when invited.
- Consult the Legal Function or Compliance Function when in doubt or when you need guidance.

We choose carefully and play fair

We cooperate with the right business partners.

We choose our business partners with care
We recognize that the conduct of our business partners can impact our reputation. That's why we take a thoughtful approach when choosing who we work with. We only collaborate with partners who demonstrate a commitment to integrity and who comply with all relevant laws and regulations.

To mitigate risks and ensure ethical conduct across our value chain, we take several important steps:

- **Selection Process:** We carefully vet potential partners before entering into any agreements.
- **Business Partner Code of Conduct:** We require partners to adhere to our Business Partner Code of Conduct, which clearly outlines our expectations in relation to compliance.
- **Ongoing Oversight:** Our responsibility doesn't end once a contract is signed. We continuously monitor our partners to ensure they meet their obligations and deliver the agreed products or services to the expected standards.
- **Proactive Response to Red Flags:** If something seems off, whether it is a minor inconsistency or a serious concern, we act quickly. Any suspicions or warning signs should be reported immediately to the Legal Function or Compliance Function for further assessment.

We play fair
Haypp Group is committed to fair and lawful competition. We fully comply with competition, antitrust, and fair-trading laws in every market we operate in. We never pursue business advantages through unethical or illegal means and always strive to compete on merit, quality, and service.

Did you know…

…that price-fixing, bid-rigging, sharing of competitively sensitive information and being part of a cartel are illegal behaviours that we never participate in.

You are expected to:

- Engage with business partners that share our commitment to integrity and compliance.
- Closely monitor the business partner throughout the contractual relationship.
- Comply with applicable competition, anti-trust and fair-trading laws and regulations.
- Consult the Legal Function or the Compliance Function if something doesn't feel right or if you have any questions.

More information
Business Partner Code of Conduct

Our Assets

We use the company's resources responsibly

We place great trust in our employees to handle company resources with care and responsibility.

We protect company resources

Company resources, including facilities, equipment, credit cards, services, and supplies, are to be used only for lawful and authorized business purposes. Misuse, negligence, or personal use beyond what is permitted can compromise both operations and compliance, and may result in disciplinary actions.

For detailed guidance, please refer to the policies and instructions listed in the right column. If you're ever unsure, don't hesitate to reach out to the Tech Function by submitting a ticket in "hello".

Travel & Entertainment Instruction

We need to use the company's financial resources responsibly, why we are cost conscious when travelling. Please ensure that you always comply with the rules set forth in our Travel & Entertainment Instruction.

Responsible use of IT resources

Haypp Group provides employees with IT tools such as computers, mobile devices, software, and access to digital services. With this access comes responsibility:

- Keep all devices updated with approved software and follow password change prompts.
- Take reasonable precautions to protect devices, data, and information from unauthorized access, theft, damage, cyberattacks, or loss.
- Never use IT resources for activities that are illegal, discriminatory, offensive, sexually explicit, or that violate human rights.

If you become aware of any misuse, security breach, or suspicious activity, report it immediately to the Tech Function and follow instructions.

Sourcing

To ensure responsible use of company resources, the Sourcing Instruction contains detailed guidelines for purchasing IT, Office Equipment, and Consultancy Services, which everyone must comply with.

You are expected to:

- Only use the company's resources for lawful, proper and legitimate business purposes.
- Protect the company's resources and report all incidents to our Tech Function.
- Read and comply with guidance found in our internal instructions.
- Not share usernames or passwords.
- Only use approved software and devices.
- Adhere to the Sourcing Instruction when in need of IT, Office Equipment, or Consultancy Services.

More information

IT Policy

Sourcing Instruction

Travel & Entertainment Instruction

Hello

We protect our information

The company's information must be used responsibly and only for lawful and legitimate business purposes.

Protecting confidential information

Some information must remain confidential, not only due to legal or contractual obligations but also because of its strategic and competitive value. Maintaining confidentiality is essential to protecting the trust of our customers, partners, and colleagues, as well as preserving our business interests.

Employees are bound by confidentiality clauses in their employment agreements and are strictly prohibited from disclosing any confidential information they come across in the course of their work. This obligation applies both during employment and after leaving the company. Likewise, business partners and external personnel are required to sign or be subject to a non-disclosure agreement (NDA) before accessing any sensitive company information.

When travelling or otherwise working away from home or your main place of work, extra steps are required to protect information. The Information Security Instruction contains safe use and travel-related guidelines which you are required to follow.

If you become aware of a potential or actual leak of confidential information – whether accidental or intentional, you must report it immediately to the Legal Function.

Examples of confidential information

Confidential information can include, but is not limited to:

- Customer and supplier data
- Agreements with business partners and contracts
- Pricing strategies and financial records
- Internal policies, instructions and procedures
- Marketing strategies and plans
- Trade secrets and competitive information
- Any other information that could harm the company, its partners, or its customers if disclosed

Further guidance on which information should be classified as confidential can be found in the Information Classification Instruction. You can also always seek advice from the Legal Function or Tech Function if in doubt.

Did you know…

…that the obligation to protect confidential information applies both during and after termination of employment?

…that Haypp Group is a publicly listed company and is therefore obliged to follow mandatory regulations on information disclosure?

You are expected to:

- Protect our confidential information and not discuss confidential information with unauthorized people (both internally and externally), in public places or the internet.
- Only access or share confidential information if there is a legitimate business reason.
- Only store confidential information on authorized devices and cloud services.
- Accompany your visitors at our facilities.
- Not take or use confidential information when leaving your employment – all such information belongs to Haypp Group.

More information

Communication Policy
Insider Policy
IT Policy
Information Security Policy
Information Security Instruction
Information Classification Instruction

We ensure responsible use of technology

The use of technology, such as software, digital tools and AI, is of vital importance, but must be used responsibly.

Responsible use of technology

Haypp Group's approach to responsible use of technology is set out across three governing documents, which together establish the governance structure and principles underpinning information security, which all employees must comply with.

Information Security Policy

The Information Security Policy sets the high-level governance framework for protecting Haypp Group's information and technology assets. The policy anchors this governance structure in the four fundamental information security principles: confidentiality, integrity, availability, and traceability.

Information Security Instruction

The Information Security Instruction supplements the Information Security Policy and details IT security procedures and access controls. A baseline level of protection applies across all IT systems, which are further protected through firewalls and security procedures.

AI Guidelines

The AI Guidelines stipulate which AI tools you can use from company-managed accounts, what you can and cannot do using AI, and what type of information that can be shared with each AI tool. It also stipulates the fundamental principle that human oversight is non-negotiable: AI is a support tool but not a decision-maker. Employees are expected to treat all AI output as a draft that requires review and validation, to disclose AI assistance where required, and to ask the Tech Function or Legal Function for advice if in doubt.

Did you know…

…all system access must be logged in JIRA and removed as soon as it's no longer needed?

… sensitive and special-category personal data (such as health information or biometric data) must never be shared with any AI tool, including approved ones?

You are expected to:

- Use only company-managed accounts for approved AI providers.
- Follow the traffic-light data classification model as outlined in the AI Guidelines before sharing any information with an AI tool.
- Treat all AI output as a draft requiring human review — AI may assist, but it must never make final decisions.
- Promptly report any suspected AI incident or breach of AI Guidelines to Tech Function

More information

Information Security Policy
Information Security Instruction
AI Guidelines

We maintain proper financial reporting

We are committed to being transparent, accurate, and compliant in all aspects of financial reporting and decision-making.

Accurate, Honest, and Diligent Reporting

We are legally obligated to record and report financial information truthfully and precisely. Any attempt to falsify records, provide misleading information, or circumvent internal controls is strictly prohibited. Integrity in our financial practices is non-negotiable.

Authorization Instruction

The Authorization Instruction establishes delegation of authority within the organization and clarifies who can authorize for what amount. This ensures that all transactions are approved by authorized personnel. All employees are required to understand and comply with this instruction. Further information on authorization, expense handling and other financial matters can be found on the Finance Intranet.

Anti-money laundering & Insider Information

We fully comply with laws and regulations related to anti-money laundering and insider information. Our internal processes are designed to ensure that financial transactions are legal, traceable, and transparent.

- **Money laundering** involves disguising the origins of illegally obtained money by passing it through legitimate channels. This is a serious crime with severe consequences.
- **Insider information** refers to non-public, material information about Haypp Group – or other companies – that could influence the price of financial instruments if made public.

Engaging in money laundering or using insider information to trade is strictly prohibited and illegal. Such actions may result in criminal penalties, including heavy fines and imprisonment.

All employees are required to comply with our Insider Policy, which provides further detail on how to handle sensitive financial information appropriately.

Did you know…

… that employees must never knowingly facilitate money laundering and immediately report suspected activity, for example:

- Attempted payments in cash or from unusual financing sources.
- Transfers of funds to or from countries or entities that are not related to the transaction or business partner.
- Attempts to evade record-keeping or reporting requirements.

You are expected to:

Provide accurate financial statements, for example by:

- Following rules on authorization rights and relevant approval processes.
- Never authorize the payment of vague or questionable expenses or third-party invoices that are poorly documented.
- Ensure expense reports and supporting receipts and documents are complete, truthful and accurate.
- Consult our Finance Function if in doubt or if you have any questions.

More information

Insider Policy
Authorization Instruction
Finance Intranet

We keep personal data safe

We are committed to handling personal data with care, transparency, and in full compliance with all applicable laws and internal guidelines. Protecting privacy is not only a legal obligation—it's a reflection of our values.

Respecting privacy

We are committed to respecting the personal data of our employees, customers, and business partners. Personal data refers to any information that can identify an individual – including but not limited to name, address, phone number, and email address.

We treat this information with the utmost care. All personal data entrusted to us must be processed responsibly and in accordance with relevant privacy regulations. Every employee plays a role in protecting this data by following applicable laws and the instructions outlined in our privacy documents.

Our commitment to transparency

Transparency is essential to building trust. We are open about how we collect, use, store, and share personal data. By clearly communicating our privacy practices, we help foster confidence and maintain strong, respectful relationships with our stakeholders.

Obligation to report data breaches

If you become aware of a personal data breach—whether accidental or due to negligence—you must report it immediately to the Legal Function. Prompt reporting is vital to minimizing impact and ensuring our compliance with legal obligations.

Did you know…

…that our data 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 use.
- We only collect personal data for specific and legitimate purposes, and do not process more data than is necessary for those purposes.
- We delete personal data when it is no longer needed.
- We protect data from inappropriate use and unauthorized access.

You are expected to:

- Comply with applicable regulations and instructions provided to protect personal data.
- Immediately report suspected personal data breaches to the Legal Function.

More information

Personal Data Processing Policy
Employee Privacy Notice
Privacy Documents

Code of Conduct Acknowledgement

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An acknowledgement of the Code of Conduct for Haypp Group shall be made by all employees.

By signing this document, 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 of Conduct.
- I agree to comply with the Code of Conduct, and all documents referenced to herein.
- I agree to report any violations of the Code of Conduct to the company.
- I agree to cooperate in any investigations concerning violations of this Code of Conduct.

Name _____

Signature _____

Job role _____

Date _____

Place _____