

Haglöfs policy on Antitrust and Competition

Introduction

This policy outlines Haglöfs position on Antitrust Law and Competition Law, which we collectively refer to as "Antitrust Laws." It applies to all entities under the Haglöfs umbrella, including Haglöfs AB and its subsidiaries. Antitrust Laws are all about promoting fair competition for the benefit of consumers. They affect many areas where Haglöfs operates, such as pricing, promotions, product sales, relationships with distributors and retailers, as well as the rules on how we interact with competitors.

This policy is universally applicable across all countries where Haglöfs operates, reflecting a commitment to adhere to the highest standards and comply with Antitrust Laws.

Unfair competition and its impact

Unfair competition doesn't just hurt businesses; it weakens economies, makes businesses less competitive, and takes away essential services from people. At Haglöfs we're firm about doing business the right way, following the highest standards and obeying all the laws, including Antitrust Laws, no matter where we operate.

All our subsidiaries and affiliates need to follow this global policy as well as the relevant local legal rules. We don't tolerate any noncompliant practices, and it doesn't matter where in the world it happens— we're committed to fairness and doing the right thing.

Definitions

- **Competition:** A process where firms independently win over consumers by offering the most favourable terms.
- **Unfair competition:** Includes practices such as fixing prices with rivals, setting prices below costs to eliminate competitors, and advertising that belittles others' products.

Contact with competitors

Sometimes, certain deals or agreements with competitors might break Antitrust Laws. Directors and employees at Haglöfs should reach out to the legal department if they suspect that agreements with competitors could infringe on these laws. It's essential to avoid meetings that might violate Antitrust Laws.

Examples of illegal conduct and arrangements include:

- **Price fixing:** Prohibited discussions or arrangements to fix, raise, or lower prices.
- **Sharing markets or customers:** Agreements determining which markets, products, or customers to sell to.
- **Boycotts:** Agreements among companies on not doing business with another entity.
- **Other prohibited conduct:** Exchange of information with competitors on costs, inventory, supplies, profit margins, and other confidential details.

Legitimate communications with competitors

Contact related to trade associations, standardization activities, joint activities influencing government action, acquisitions, joint ventures, teaming arrangements, and joint research and development may be permissible at Haglöfs. Such communications should serve a legitimate purpose and be documented appropriately. If there's any doubt or concern, it's important to consult with the legal department for guidance. We encourage open collaboration at Haglöfs, as long as it's transparent and aligns with our commitment to fair and legal practices.

Additional guidelines for business practices

- **Resale price maintenance:** Controlling the resale price is against the law. Distributors and retailers are expected to set their own prices, and while Haglöfs can suggest recommended resale prices, we can't influence these prices beyond recommendations.
- **Restricting parallel trade and internet sales:** Dealing with distributors and retailers in a way that violates Antitrust Laws can result in fines and damage claims. At Haglöfs, we're committed to fair practices and legal compliance.
- **Customer termination:** Terminating a customer should be done lawfully and for legitimate reasons to avoid legal complications. We take customer relationships seriously at Haglöfs, and any termination is approached with legality and fairness in mind.

Risks and consequences

Breaking this policy and the applicable Antitrust Laws can lead to serious consequences for Haglöfs, including substantial fines, damage to our image and reputation, criminal sanctions, legal actions from affected parties, and the voiding of contracts that infringe on Antitrust Laws. We take these measures seriously to uphold our commitment to fair practices and legal compliance.

Consequences of violations of this policy

Policy violations may lead to disciplinary action, including termination of employment.

Record-keeping and reporting

- A) Keep accurate and transparent records of all business transactions.
- b) Everyone—directors, employees, and business partners—should report any instances of unfair competition promptly.
- c) If there's any hint of illegal activity, Haglöfs is committed to reporting it to the authorities and cooperating fully in investigations.
- d) Concerns raised will be reviewed and, if necessary, investigated.
- e) Reporters are encouraged to gather all necessary information before making a report.
- f) Haglöfs does not tolerate malicious reporting or any form of retribution against those who report in good faith. We're all about maintaining a culture of openness and accountability.

Communication and training

Communication and training programs are in place to ensure that this policy is well understood and adhered to.

Monitoring and review

The policy's effectiveness is regularly monitored and reviewed for suitability, adequacy, and effectiveness.