

Haglöfs policy on Anti-Bribery and Anti-Corruption

Bribery and corruption

At Haglöfs we recognize the pervasive and damaging impact of bribery and corruption on both business and society. These practices undermine political systems, weaken economies, make business uncompetitive, and deprive people of essential services.

Haglöfs anti-bribery and anti-corruption commitment

Haglöfs, together with its subsidiaries and affiliates, firmly commits to a zero-tolerance approach towards the giving or receiving of bribes or engaging in corrupt practices globally. This commitment is deeply rooted in Haglöfs' corporate philosophy, which emphasizes intolerance for bribery and corruption. We are dedicated to conducting business in accordance with the highest governance standards, ensuring compliance with all applicable laws.

Position and scope of this policy

This policy serves as a clear guideline from Haglöfs regarding its stance on bribery and corruption. It is designed to complement local anti-bribery and anti-corruption policies, applying uniformly to all subsidiaries and affiliates. In the absence of such local policies, this global policy takes precedence.

Definitions

- **Bribery:** Offering, giving, or receiving money or valuable items to a government official or private individual to gain or keep business advantages, whether asked for or not.
- **Corruption:** Wrongfully using entrusted power for personal or corporate gain.

Prohibited conducts

This policy applies universally to Haglöfs, its subsidiaries, and affiliates. Haglöfs engages exclusively with business partners complying with this policy, necessitating due diligence in high-risk areas. Haglöfs and its business partners commit to refraining from offering, promising, giving, or demanding bribes or undue advantages, recognizing the extraterritorial effect of modern bribery laws.

Donations

While we encourage community support and donations, they must adhere to our authorized limits. Contributions must not be a cover for bribery and should never be directed towards political or religious organizations.

Scope of this policy and business partner engagement

This policy applies universally to Haglöfs, its subsidiaries, and affiliates. Haglöfs engages exclusively with business partners complying with this policy, necessitating due diligence in high-risk areas. Haglöfs and its business partners commit to refraining from offering, promising, giving, or demanding bribes or undue advantages, recognizing the extraterritorial effect of modern bribery laws.

Responsibility of our employees and management

All Haglöfs directors and employees worldwide are obligated to understand and adhere to this policy. Management is responsible for communication, training, and ensuring compliance. Training programs aim to equip employees in handling dilemmas related to bribery and corruption.

Risks and consequences

Violations of this policy may result in severe sanctions against Haglöfs, including substantial fines, forced repayment of profits, exclusion from public contracts, and criminal sanctions against directors and employees. Competitors may pursue legal action, and allegations can harm Haglöfs' reputation, and affect business.

Consequences of violations

Consequences for policy violations range from denial of expense reimbursement to disciplinary actions, including termination of employment. Falsifying reports or mislabelling gifts for improper purposes constitutes major policy violations.

Record-keeping and reporting

- a) Accurate records, including accounting records, must be maintained transparently.
- b) Directors, employees, and business partners are obligated to report any breach of this policy to the legal department or internal audit promptly.
- c) Haglöfs reports illegal acts to authorities and fully cooperates in investigations.
- d) Concerns raised are reviewed and investigated.
- e) Reporters are encouraged to gather information before reporting, and malicious reporting is not tolerated.
- f) Retaliation against reporters is considered serious misconduct.

Communication, training, monitoring, and review

To make sure that this policy is well understood, we have communication and training programs in place. We regularly check how well the policy is working to ensure it's suitable, adequate, and effective. This helps us keep things clear and ensure that everyone is on the same page when it comes to preventing bribery and corruption at Haglöfs.

Haglöfs policy on Anti-Bribery and Anti-Corruption – ANNEX

DO's and DON'Ts

- **DO NOT** accept or offer any form of bribe, even if it causes short-term delays.
 - **DO** promptly return any received bribe and report as per the reporting chapter.
 - **DO** record expediting payments with appropriate approval.
 - **DO NOT** make unofficial payments for permissions, permits, or stamps.
 - **DO** pay expenses directly to service providers or obtain invoices.
 - **DO NOT** offer advantages beyond what's allowed by this policy.
 - **DO** report any solicitation for a bribe immediately.
 - **DO** seek written permission for exceptions or in case of doubt.
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- **Hospitality:**
 - **DO** ensure transparent and documented customer invitations.
 - **DO** extend invitations to appropriate business contacts.
 - **DO** consider cumulative effects and potential impropriety.
 - **DO** provide modest gifts with no easily convertible cash value.
 - **DO** assess invitations in relation to key business decisions.
 - **DO** define a legitimate business purpose for hospitality programs.
 - **DO** benchmark expenditures against industry and market standards.