



CODE OF CONDUCT

ABOUT HAGLÖFS

We come from the North. From Torsång in Dalarna, Sweden.

Where the temperature stays below zero for months, and the sun under the horizon for just as long. Folks from this part of the world find peace on the inside, by staying outside. They learn to love the weather as children, while gently rocked to sleep by whispering winds.

Haglöfs started with a backpack, born from the vision of Wiktor Haglöf over a hundred years ago. As time passed by that backpack became filled with knowledge and wisdom, gained from countless innovations and an endless pursuit of perfection.

Today, everyone can spend less time worrying about the elements, and more time enjoying them. Because they know that Haglöfs can be trusted. In all kinds of weather.

OUR VALUES

Haglöfs brand values are the foundation of everything we do and how we act. They are a reflection of our past, relevant today and guidance for tomorrow.

CURIOUS

We push boundaries.

We have curious minds. We are always curious to learn more, finding new and better ways of doing things. Our curiosity drives innovation and ensures we stay relevant in an ever-changing world.

RELIABLE

We earn trust.

We are always reliable. Our products can be relied upon to last and perform even in the toughest conditions. We are reliable colleagues and business partners who speak the truth and honour our commitments.

PROUD

We are passionate.

We come from Dalarna, Sweden. We are proud people. Proud of who we are and where we come from. Proud of our products and the people who use them. Proud of how we treat and respect the world and everyone in it

THE CODE OF CONDUCT

Haglöfs success is built on trust and a reputation gained through honesty, fairness, respect and hard work. We are committed to operating ethically, wherever we are in the world. We are proud of the way we do business.

Our Code of Conduct explains what it means to uphold our values while ensuring that acting with integrity, following legal requirements, and showing respect towards each other, our customers and our business partners continues to be the cornerstone of everything we do. It applies to everyone employed by, or who conducts business on behalf of, Haglöfs AB and its affiliates regardless of seniority or location. We are all responsible for reading, understanding and applying the Code of Conduct. We also expect our business partners to follow comparable principles, and we aim to work only with those who meet our standards.

The Code of Conduct does not address every situation we may encounter but highlights the principles that underpin our actions, pointing to available resources when more guidance is needed. At all times we will conduct our business in strict compliance with applicable laws and regulations and expect the same from our business partners. If a part of this Code conflicts with applicable laws, then the laws prevail.

OUTSIDERS BY NATURE

At Haglöfs we aim to create an environment where difference and diversity are valued by treating everyone fairly, with dignity and respect while providing a safe and healthy work environment for all employees. We understand the value of the outdoors.

OUTSIDERS

We embrace difference and diversity knowing that a wide range of perspectives and skills is vital to our success, aiming to create an inclusive environment that welcomes and values these differences. This also means we make decisions about recruitment, compensation, development opportunities and promotion based only on merit and without regard to race, colour, national origin, religion, sex, age, physical or mental health, sexual orientation or any other characteristic protected by law.

We understand the physical and mental benefits of the outdoors and aim to positively contribute to society by inspiring people to get outdoors, offering high quality products and services which enable them to do so. We also support and encourage employees to participate in outdoor activities. Part of this support comes in the form of access to discounts and samples of our product. Resale of these items for profit is strictly prohibited.

Our connection to the outdoors helps us understand the importance of protecting the environment today and for generations to come. We commit to continually seeking ways to:

- REDUCE OUR CARBON FOOTPRINT ACROSS OUR OWN OPERATIONS AND FROM THE MANUFACTURE OF OUR PRODUCTS
- REDUCE RESOURCE USE AND WASTE ACROSS THE LIFE CYCLE OF OUR PRODUCTS
- DRIVE LARGER SCALE POSITIVE CHANGE THROUGH RAISING AWARENESS, EDUCATION AND COLLABORATION

SAFE WORK ENVIRONMENT

Safety and security are team efforts. We require every employee to use common sense to ensure the health, safety and security of our colleagues and workplaces. Employees should not undertake work for which they are not trained and work following good safety practices complying with relevant policies, laws and regulations.

Creating a safe, work environment also means treating each other with respect and not tolerating intimidation or harassment in any form. We prohibit any act that could cause another individual to feel threatened including verbal threats, harassment, physical attacks or any other behaviour that would make others feel unsafe. This includes any conduct - whether physical, verbal or sexual - that has the purpose or effect of creating an intimidating or hostile workplace. Examples include:

- SLURS, OFFENSIVE REMARKS OR JOKES BASED ON A PERSON'S RACE, COLOUR, RELIGION, NATIONAL ORIGIN, SEX, AGE, DISABILITY, SEXUAL ORIENTATION OR OTHER SIMILAR CHARACTERISTICS
- UNWANTED TOUCHING, ASSAULT OR INTIMIDATING GESTURES SUCH AS BLOCKING A PERSON'S MOVEMENT
- REQUESTS FOR SEXUAL FAVOURS OR UNWANTED SEXUAL ADVANCES, SUCH AS LEERING OR MAKING OBSCENE GESTURE

Haglöfs takes drug and alcohol abuse seriously and will not tolerate it. We do not allow employees to work under the influence of alcohol or illegal drugs.

WHAT TO DO:

If you encounter any unsafe conditions or injuries, or experience incidences of discrimination, intimidation or harassment, report it to a manager or Human Resources immediately.

If you are concerned about a substance-abuse problem, get in touch with Human Resources who can support employees in accessing professional help.

PRIVACY

We respect the privacy of employees by using, maintaining and transferring personal data following appropriate data protection standards. We also strive to protect the confidential information of our consumers and 3rd parties, protecting their personal information against unauthorised access, use or disclosure.

WHAT TO DO:

If you have any questions about the use and handling requirements of personal data including that of consumers and 3rd parties, consult our Data Protection Officer.

POLITICS, CHARITY AND OUTSIDE ACTIVITIES

We encourage support of charitable causes and respect the rights of employees to be involved in political activities. Such activities should take place in employees' own time, not make use of our company property or name and avoid any potential conflict of interest.

We require that employees seek approval before accepting a position on the board of directors for another for-profit business or agreeing compensation for activities outside of Haglöfs which in anyway relate to their role at the company.

WHAT TO DO:

If you have concerns about potential conflicts of interest or questions related to reimbursement for services seek advice from Human Resources.

For more details see:

Haglöfs Work Environment Policy

Global Privacy Policy

WE ARE PROUD OF THE WAY WE DO BUSINESS

At Haglöfs we are committed to operating honestly and ethically, wherever we do business in the world.

We run our business in a responsible manner following good governance principles and taking the long-term view.

We are committed to reliable and timely reporting and public communications. This includes ensuring that accounting, financial and other relevant records are always accurate and complete.

We expect our employees to make decisions and take actions that are in the best interest of the business, taking care not to involve themselves in anything that could result in a real, or perceived, conflict between their personal interests and those of the company. Examples of activities that might create a conflict of interest include:

- ACCEPTING OUTSIDE EMPLOYMENT WITH OUR SUPPLIERS, CUSTOMERS OR COMPETITORS
- HAVING A FINANCIAL INTEREST IN THEM (EXCEPT FOR MINOR HOLDINGS IN A PUBLICLY TRADED COMPANY)
- HIRING OF FAMILY MEMBERS AND/OR HAVING A DIRECT REPORTING RELATIONSHIP WITH FAMILY MEMBERS
- DOING BUSINESS WITH FAMILY OWNED OR FAMILY RELATED COMPANIES

WHAT TO DO:

Consult with Human Resources if in doubt. Any conflicts of interest must be documented and approved.

ETHICAL PRODUCTION

We aim to maintain a supply chain which delivers a balance of technical ability, quality, capacity, innovation and competitiveness while promoting fair labour practices, safe working conditions and good environmental management.

We demand that nobody whose work contributes to our success has their human rights curtailed or suffers bodily or economic harm. Our manufacturers must treat their employees with respect and dignity.

In manufacturing our products, we strive to ensure they are safe for consumers, workers and the environment. We encourage suppliers to improve the environmental profile of their manufacturing facilities and specifically to reduce energy use, water use and waste.

Human rights are a set of rights which recognise the inherent dignity, freedom and equality of all human beings. Haglöfs supports and respects the Universal Declaration of Human Rights and the Conventions of the International Labour Organisation (ILO) through application of the following principles:

- EMPLOYMENT IS FREELY CHOSEN
- NO DISCRIMINATION IN EMPLOYMENT
- NO EXPLOITATION OF CHILD LABOUR
- FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING
- PAYMENT OF A LIVING WAGE
- NO EXCESSIVE WORKING HOURS
- SAFE AND HEALTHY WORKING CONDITIONS
- LEGALLY-BINDING EMPLOYMENT RELATIONSHIP

OUR CHOICE OF BUSINESS PARTNERS REFLECTS WHO WE ARE

The business partners we choose to work with are a reflection of our brand and have a significant bearing on our success as a business. It is important that our choice of business partners reflects our values and that we behave responsibly towards them.

We expect our business partners to adopt and implement our Code of Conduct or have their own policies that reflect equivalent standards. All manufacturers producing Haglöfs product or raw materials either directly or indirectly must comply with our Code of Labour Practices and accept our Terms of Engagement.

We commit to initiating and maintaining strong, equitable and loyal relationships with business partners, developing mutually beneficial partnerships.

We insist on honesty and integrity in all aspects of our business with partners and do not tolerate any attempts to obtain business from us by payments, hospitality or gifts to our employees or agents or members of their families.

REPRESENTING THE BRAND

We are proud ambassadors of our brand representing our values even while conducting business outside of the workplace.

We expect our employees to be mindful of how they use social media adhering to the following guidelines if they mention Haglöfs online:

- ONLY AUTHORISED EMPLOYEES ARE PERMITTED TO USE SOCIAL MEDIA ON BEHALF OF HAGLÖFS
- CLEARLY STATE YOUR ASSOCIATION WITH THE BRAND
- USE OUR VALUES AS YOUR GUIDE
- DO NOT DISCUSS CONFIDENTIAL OR PROPRIETARY INFORMATION
- NEVER MAKE DISPARAGING, MISLEADING OR INTIMIDATING REMARKS ABOUT COLLEAGUES, CONSUMERS OR COMPETITORS

For more details see:

Haglöfs Code of Labour Practices

Haglöfs Restricted Substances List

Haglöfs Animal Welfare Policy

OUR VALUES, PRODUCTS AND SERVICES ARE OUR COMPETITIVE ADVANTAGE

At Haglöfs we take pride in competing based on the strength of our values and the quality of our products and services, rather than seeking an improperly obtained advantage.

TRUST IN THE QUALITY OF OUR PRODUCTS

We are proud of the quality of the products we make, and they are vital to our continued success. We adhere to the strictest standards for safety and quality and expect the same of our supply chain. Counterfeit products or components can jeopardise these standards.

WHAT TO DO:

If you become aware of any safety or quality issues in our products, or if you suspect the use, sale or production of counterfeit products or components, report it to your manager or a senior member of the sourcing team immediately.

UNDUE INFLUENCE AND COLLUSION

In conducting business, we expect our employees to always be fair and impartial. We do not tolerate any attempts to influence business activity by giving or accepting bribes, kickbacks, facilitating payments or valuable favours, gifts or entertainment which create a sense of obligation, compromise professional judgment or even give the appearance that it could. Examples include cash payments, offers of employment, excessive travel or entertainment or favours for family members. Infrequent gifts of nominal value may be acceptable where they fall within generally accepted business practice for our industry.

We do not discuss or enter into an agreement with competitors about issues such as prices, production levels, sales territories, or other aspects that could constitute violation of competition or anti-trust laws and regulations.

We do not make use of information disclosed to us by a third party if it is suspected they are violating an obligation of confidentiality.

WHAT TO DO:

If a competitor attempts to engage you in conversation about any prohibited topic remove yourself from the conversation immediately and report the incident to the legal team.

PROTECTING COMPANY PROPERTY AND INFORMATION

We are each responsible for the proper use, protection and conservation of Haglöfs' property, using it in the manner intended and protecting it from loss, damage, or unauthorised use. This applies to property irrespective of its location including:

- PHYSICAL PROPERTY, SUCH AS EQUIPMENT, FACILITIES, STOCK, CASH AND VEHICLES
- INTELLECTUAL PROPERTY OR PROPRIETARY INFORMATION INCLUDING BUSINESS CRITICAL INFORMATION, PATENTS, DESIGNS, TRADEMARKS AND COPYRIGHTS
- INFORMATION TECHNOLOGY RESOURCES, INCLUDING COMPUTER SOFTWARE, NETWORKS, STORAGE DEVICES, E-MAIL AND VOICE MAIL

Company property is intended to be used for appropriate business purposes only. While incidental personal use of Haglöfs' IT resources is permitted on a limited basis, such use must not interfere with our jobs

FAIR COMMUNICATION

We are honest, fair and fact-based in our marketing practices and when discussing the quality, features or availability of our products and services.

We do not make disparaging or untrue statements about our competitors or make inaccurate or unfair comparisons between our competitors' products and services and our own.

For more details see:

Global Policy on Anti-bribery and Anti-corruption

Global Policy on Anti-trust and Competition

FINALLY

We all have a responsibility to follow and enforce our Code of Conduct to help keep our workplaces inclusive and safe and to ensure we take business decisions we can be proud of.

This code cannot cover every situation and there may be times when the right thing to do is not immediately clear. In those instances, asking these questions can be helpful:

- IS THE DECISION OR ACTION I AM GOING TO TAKE IN LINE WITH THIS CODE?
- HAVE I UNDERSTOOD THE RISK AND THE POSSIBLE IMPLICATIONS OF WHAT I AM DOING?
- HAVE I CONSIDERED ANY POTENTIAL IMPACT ON HAGLÖFS' REPUTATION?
- IS IT LEGAL?
- AM I SETTING A GOOD EXAMPLE?
- HOW WILL I FEEL IF THE ACTION I TAKE TODAY IS FEATURED IN THE MEDIA TOMORROW?

If the answer to any of these questions is 'No' then you should not proceed. If you are unsure, seek advice.

WHERE TO SEEK GUIDANCE OR RAISE CONCERNS

Throughout this code there is reference to more detailed policies which may help to answer your questions. If these still do not address your concern then generally, the first person to approach is your line manager or supervisor. If you feel that you cannot raise your concern with your line manager, for whatever reason, you should contact the senior manager in your business area.

If you feel you need to raise the issue outside of your immediate working environment, the following resources are available to you:

- HUMAN RESOURCES hr@haglofs.se
- HAGLÖFS LEGAL COUNSEL legal@haglofs.se
- HAGLÖFS DATA PROTECTION OFFICER privacy@haglofs.se
- HAGLÖFS HEAD OF SUSTAINABILITY sustainability@haglofs.se
- [ETHICSPPOINT](#) - A FREE, SECURE AND CONFIDENTIAL SERVICE FOR THOSE WHO WISH TO RAISE A CONCERN.

Haglöfs encourages open and honest communication without fear of retaliation. You should be confident that when you report a suspected violation of our code your concerns will be fully investigated in a timely manner. We will not tolerate retaliation against any employee who, in good faith, raises a concern or reports a suspected violation of this code.

The consequences for violating this Code will depend upon the facts of each situation but may range from a verbal warning to disciplinary action which may include termination of employment.

For more details see:

Global Policy on Protect Disclose (Whistleblowing)

