

# **Hans Just Group Code of Conduct**

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## 1. Opening Remarks

Hans Just Group Code of Conduct describes who we are and the responsible sustainable business values that characterise our company. The Code of Conduct provides clear expectations for how we conduct business in a responsible manner and reflects our group-wide commitment in doing business with ethics and integrity.

Hans Just Group operates in a demanding and regulated business environment where responsible business conduct and integrity are essential requirements for the reputation and success of the company. We follow simple and clear rules, engage responsibly with stakeholders, transparently account for the financial transactions we make and work against corruption in all its forms. This is a way to demonstrate financial and social responsibility. Responsible business conduct encompasses daily business tasks and the treatment and respect of one another as management, supervisors, and colleagues.

The Board of Directors has approved this Code of Conduct and oversees compliance with it by management, supervisors, and employees throughout the Hans Just Group.

## 2. Applies to

This Code of Conduct applies to all Hans Just Group employees. Employees must read this Code of Conduct and apply its principles in daily work and involve relevant people early if in doubt to solve potential ethics and compliance issues. We operate around the globe and respect and comply with the law wherever we do business. Daily work should always be carried out with an ethical and sustainable mindset and for results to matter they must always be achieved the right way.

### 3. Report a Concern

Hans Just Group encourages an open and honest culture of trust and integrity. We are committed to providing access to mechanisms for our employees to raise workplace related grievances. Anyone who becomes aware of an actual or potential violation of Hans Just Group Code of Conduct should speak up and report the possible unethical business conduct, human and labour rights and environmental infringements, other potential breach of law, rules and regulations or other compliance concerns.

Openness and the expression of concerns are highly valued as they contribute to maintaining high standards of conduct, governance, and accountability within the company. All reported compliance concerns are thoroughly investigated through a fair and established internal process to ensure accuracy, confidentiality, and impartiality. In this process we ensure engagement with affected stakeholders. We do not tolerate retaliation against anyone who raises good-faith concerns about improper behaviour at Hans Just Group.

Use this external link to report your concern: <a href="https://hansjust.whistlesystem.com/login/vNUZiH9uf1aDflC7EIG">https://hansjust.whistlesystem.com/login/vNUZiH9uf1aDflC7EIG</a>

## 4. Business Ethics in General

We never compromise on quality and business ethics, and we interact responsibly, ethically, and transparently with all our stakeholders. We are truthful in our business interactions, and we do not offer, promise, provide, or accept anything of value to inappropriately influence a decision or gain an unfair advantage. We always aspire to ensure compliance with law, rules and regulations applicable to our business. Our company's integrity and good reputation depend on every Hans Just Group employee.

# 4.1 Bribery and Improper Advantages

At Hans Just Group we compete fairly and are responsible, ethical and transparent in our business. We do not bribe or provide improper advantages. We have a zero-tolerance policy towards bribery and corruption in business. We also expect the same from our representatives, consultants, agents, subcontractors, and other business partners when performing our services. For more information, please be referred to Hans Just Group Responsible Sourcing Code of Conduct.



#### 4.2 Fraud

We are committed to preventing and detecting fraud and do not engage in fraud against Hans Just Group, any of our business partners or government entities. Generally, fraud means deliberately deceiving a person or company to unjustly obtain an unauthorised benefit, such as money, property or services.

#### 4.3 Books and Records

We ensure the integrity of our business transactions by keeping documents and records organised, accurate, and complete. Records like invoices, employee expenses and any transfer of value to a company, organisation or individual outside the Hans Just Group should reflect the nature of the business purpose, business transaction, be truthful, complete and unaltered.

#### 4.4 Conflicts of Interest

Our employees always make business decisions which are aligned with Hans Just Group and our shareholders' best interests. We make decisions based solely on objective criteria and professional judgement, and are never improperly influenced by our personal, social, financial or political interests. Allowing personal gain or benefit at the expense of Hans Just Group can put our reputation for honesty and fairness at risk.

#### 4.5 Fair Competition

The Hans Just Group believes in fair competition and consistently complies with laws promoting and protecting free and fair competition. Competition laws govern our interactions with suppliers, customers, distributors, competitors, and third parties. We strictly prohibit competition law violations, such as participating in cartels, abusing market dominance, or exchanging price or commercial information with competitors.

## 4.6 Protecting Confidentiality of Trade Secrets

We are committed to safeguarding the confidentiality of Hans Just Group's and its partners' trade secrets and business-related information.

## 4.7 Protecting our Brand Owners

Brands are the foundation of our success at Hans Just Group, and we make great efforts to protect and defend our brand owners' value, validity, and goodwill.

#### 4.8 Social Media and Digital Solutions

We use social media and digital solutions in a compliant way, both for business communication and private purposes. For business-related communication, we only use digital solutions that are controlled or approved by Hans Just Group for business-related communication and if we have permission to do so from all relevant stakeholders. We support the responsible use of digital solutions and new technologies.

#### 4.9 Responsible Consumption and Marketing

The Hans Just Group believes in a sustainable and responsible drinking culture that minimises alcohol-related harm while supporting the positive aspects of moderate alcohol consumption. We have a statement advocating responsible consumption and marketing our products according to laws and with moderation. We take the harm caused by alcohol misuse seriously and strongly oppose underage alcohol use. In all work-related situations, our employees must ensure that their judgement or performance is not impaired by alcohol consumption.

#### 4.10 Relations with Authorities and Governments - Political Activity

Hans Just Group actively and openly participates in the communities where we operate, contributing to their well-being through taxes, employment, and community involvement. We work with governments and public organisations directly and through industry associations to develop proposed legislation and regulations relevant to our business interests. The company does not support political parties or organisations, nor do we participate in financing or supporting individual political candidates' campaigns.



## 5. Human & Labour Rights

Hans Just Group is committed to meeting the responsibility to respect human rights throughout our own operations and value chains as defined by the UN Guiding Principles on Business and Human Rights. Our human rights commitment refers to all internationally recognised human rights. This includes all human rights at a minimum as stated in the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We strictly prohibit the use of any form of child labour, forced and bonded labour or the trafficking in persons across all our operations and in our value chain. We ensure that all our employees work for the company on a voluntary basis, and not under threat of any penalty or sanctions.

Our mission is to avoid infringing on the human rights of our employees, workers in our supply chains, communities and other stakeholders. We strive to prevent and mitigate adverse human rights impacts with which we are involved either in our own business operations or through business relationships. We report on our human and labour rights in our annual report. Hans Just Group human rights commitment and implementation are overseen by Sustainability.

#### 5.1 Equality, Harassment and Discrimination

At Hans Just Group, we follow the company's values and principles. We are committed to treating every employee with dignity and respect and to promoting equality of opportunities within Hans Just Group. We believe that equal treatment provides an attractive, engaging, and effective workplace for our employees. We offer equal treatment and opportunities for all employees, and a working environment free from discrimination and harassment. All managers and employees are encouraged to enhance respect and trust through personal behaviour, performance, openness, and social competence. Managers must set clear, ambitious, and realistic goals for the employees under their supervision and lead by example.

#### 5.2 Freedom of Association and Collective Bargaining

We respect our employees' right to associate freely, to join or refrain from joining labour unions and without fear of discrimination or retaliation.

## 5.3 Working Hours

We are committed to providing for permissible working hours. We will not make systematic use of extensive overtime work. Any overtime hours will be appropriately compensated according to individual terms of employment, applicable regulation and relevant collective agreements.

#### 5.4 Living Wage

We ensure that all employees earn sufficient income in a standard working week to, at a minimum, meet their basic needs (and those of their families) and to provide some discretionary income.

#### 5.5 Leave

We provide rest-periods, breaks and leave for all our employees. Leave includes vacation and holiday leave, sickness leave and parental leave.

## 5.6 Data Privacy

The Hans Just Group secure the right to privacy of our employees and stakeholders and places a high emphasis on confidentiality. We respect the right to privacy of our employees whenever personal employee data is gathered or the workplace is monitored. Personal employee data is processed lawfully and fairly and Hans Just Group always ensure compliance with data privacy law, rules and regulations. We collect, use, and process personal data for legitimate business purposes only. We always handle personal data responsibly and, in a manner, compatible with the original purpose.

# 6. Health & Safety

Hans Just Group places the highest importance on the health and safety and work systematically on providing our employees with safe and healthy work conditions. Management, supervisors, and all employees are responsible for ensuring safe and healthy working conditions and record potential safety incidents.



#### 7. Environment

At Hans Just Group we strive to be a sustainable business and integrate environmental considerations in everything we do. The environment is a crucial focus of our corporate responsibility efforts, and we work to decarbonise our supply chain impact by reducing resource consumption and waste generation. We report on our environmental performance in our annual report.

## 8. Corporate Due Diligence Duty

With our sustainable corporate behaviour, Hans Just Group aim and target is to contribute to sustainable development and to the sustainability transition of economies and societies. Our human and environmental due diligence approach is implemented to meet the UN Guiding Principles on Business and Human Rights (UNGPs), current legal requirements and it is approached from an opportunity and risk management perspective to ensure it is cohesive and comprehensive across the company.

The Due Diligence process includes identification, assessment, prevention, and mitigation, ending and minimisation of potential or actual adverse human rights and/ or environmental impacts connected with Hans Just Group's own operations. Finally, Hans Just Group communicates how most severe impacts are addressed in our annual report.