



# 9. Corporate Responsibility Policy

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This policy was adopted by the Board of HL Display Holding AB / HL Display AB.

The policy shall be revised as required and reviewed at least once a year.

# Content

<b>1. Introduction</b>	<b>4</b>
<b>2. Background</b>	<b>4</b>
<b>3. Guidelines</b>	<b>4</b>
<b>4. Reporting</b>	<b>5</b>
<b>5. Implementation</b>	<b>5</b>
<b>Appendix A: Code of Conduct</b>	<b>6</b>
<b>1. Human Rights</b>	<b>6</b>
<b>2. Labour Standards</b>	<b>6</b>
2.1 Freedom of association	6
2.2 Forced and compulsory labour	6
2.3 Child slavery and child labour	6
2.4 Workplace	6
2.5 Discrimination	6
2.6 Purchase of sexual services and child pornography	7
<b>3. Environment</b>	<b>7</b>
3.1 Precautionary approach	7
3.2 Environmental responsibility	7
3.3 Commitment to climate	7
<b>4. Anti-corruption</b>	<b>7</b>
4.1 Consumer interests	8
4.2 Competition	8
4.3 Export control	8
4.4 Conflicts of interest	8
4.5 Relationships with external parties, such as suppliers and business partners	9
4.6 Violations	9
<b>5. Implementation</b>	<b>9</b>
<b>Appendix B: Policy for employee diversity, inclusiveness and equality</b>	<b>10</b>
<b>Appendix C: Policy for Working Environment, Health &amp; Safety</b>	<b>12</b>
<b>Appendix D: Policy for Whistleblowing</b>	<b>13</b>
<b>1. Objectives</b>	<b>13</b>
<b>2. Actions covered</b>	<b>13</b>
<b>3. Background</b>	<b>13</b>
<b>4. Reporting a concern</b>	<b>13</b>
<b>5. Confidentiality &amp; support for whistleblowers</b>	<b>14</b>
<b>6. Implementation</b>	<b>14</b>
<b>Appendix E: Policy for Environment and Sustainability</b>	<b>15</b>

**Appendix F: Code of Conduct for suppliers .....17**

- 1. Introduction.....17**
- 2. Human and Labour Rights.....18**
- 3. Business Ethics .....18**
- 4. Sustainable Growth .....19**
- 5. Environmental Care.....19**
- 6. Health & Safety .....19**

**Appendix A: Signatures .....21**

**Appendix B: Report of non-compliance .....22**

## 1. Introduction

HL Display's CR Policy aims to give our business partners, employees, shareholders and other stakeholders a clear view of how HL Display conducts business, and the demands we put on ourselves and our partners in our business dealings.

## 2. Background

HL Display (HL) is a company with activities in more than 70 countries, primarily in Europe and Asia, and with production in China, Sweden, Poland, Germany, Canada and the UK.

Our vision is to be the preferred partner for delivering innovative solutions that create a better in-store experience for shoppers and personnel. We bring this to life through our values: Ownership, Speed, and One Team.

We support our customers on their journey to more sustainable stores by reducing the usage of virgin plastic, reducing packaging waste, and reducing food waste, while also reducing the footprint of our own operations.

We adhere to the United Nations declarations on Human Rights, Labour Standards, Environment and Anti-corruption and we are a member of UN Global Compact.

Our commitment to environmental protection is reflected by over 10 years of implementing ISO 14001 standards in our factories, with ongoing efforts to extend certification to all our facilities. We have set science-based targets, approved by the SBTi, to reduce our carbon emissions in line with a 1.5°C pathway by 2030.

As a market leader, we are committed to working in accordance with the CSRD and go beyond compliance with GRI reporting regulations, setting an example for Corporate Responsibility and inspiring positive change across our sector.

## 3. Guidelines

- Our first commitment is to drive an ethical and profitable business in strict adherence with regulatory requirements, thus ensuring:
  - We are a trustworthy partner for our business associates
  - A safe and developing workplace for all employees
  - Return on investment for our shareholders
- The products we develop and supply must be resource efficient. Not only in manufacturing, but also in transportation and installation, and sufficient information must be given for end-of-life treatment of products.
- We are committed to reducing our environmental impact and contributing to sustainable development in line with the European Sustainability Reporting Standards. Our efforts focus on mitigating climate change, optimizing resource use, and promoting circularity within our operations and across our value chain.
- We strive to minimize our carbon footprint by increasing the use of renewable energy, recycling production waste, and incorporating recycled and renewable materials. We ensure compliance with environmental regulations and aim to provide more sustainable product alternatives. As a Science-Based Targets initiative (SBTi) member, we calculate and disclose Scope 1, Scope 2, and Scope 3 emissions and implements strategies to achieve net-zero emissions. We focus on using renewable materials and designing durable products (Appendix E)

- We prioritize virtual meetings, supports multimodal transportation to lower emissions, and continuously improves the sustainability of our vehicle fleet, including a move towards electric vehicles.
- Suppliers serving HL sign Code of Conduct for suppliers (see Appendix F), adhering to rules drawn from the UN Declarations cited above.
- We secure freedom of association, anti-discrimination, anti-corruption and workplace safety through a continuous pursuit of the objectives set out in our policies Code of Conduct (Appendix A) and Working Environment, Health & Safety (Appendix C).

## 4. Reporting

HL Display Group publishes a yearly progress report on sustainability, aligned with the UN Global Compact principles, incorporating the GRI framework and adhering to the European Sustainability Reporting Standards (ESRS).

## 5. Implementation

This policy is published on our external and internal web sites. Managers are responsible for communicating a reminder of the Corporate Responsibility policy annually.

## Appendix A: Code of Conduct

**This policy was adopted by the Board of HL Holding AB and HL Display AB and is applicable to all subsidiaries in the group as well as HL Partners. The policy shall be revised as required and reviewed at least once a year.**

HL is a UN Global Compact signatory since 2010, and our Code of Conduct reflects the commitment we have towards the ten principles of the Global Compact. HL's Code of Conduct outlines the minimum standards we require our employees to comply with. We adhere to the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. Any employee found to be in violation of this policy will be subject to disciplinary action, up to and including termination of employment.

We expect our suppliers to adhere to the same principles, which are described in Appendix F: Code of Conduct for Suppliers.

HL Display Group and HL Partners are hereinafter referred to collectively as "HL".

### 1. Human Rights

HL supports and respects the protection of internationally proclaimed human rights and makes sure that we are not complicit in human rights abuses.

### 2. Labour Standards

#### 2.1 Freedom of association

As local or relevant laws allow, all employees are free to form, join or not to join unions and have the right to collective bargaining when employed by HL.

#### 2.2 Forced and compulsory labour

No form of forced or compulsory labour is tolerated by HL. This includes any form of forced, compulsory or illegal labour, including trafficking, prison labour, bonded labour or any other kind of exploitation or abuse. All employees have the right to leave their employment as stated by contracts or local laws.

#### 2.3 Child slavery and child labour

We are not complicit in any form of child slavery, child labour or other forms of exploitation of children. No one is employed below the completion of compulsory school or under the age of 15 and no one under the age of 18 is employed for hazardous work within HL.

#### 2.4 Workplace

HL shall provide a working environment that is healthy, safe and in accordance with the relevant ILO conventions and applicable local laws for all employees. HL makes every effort to pay fair salaries and remuneration in accordance with relevant norms in the locations in which the Group has operations.

#### 2.5 Discrimination

Diversity amongst HL employees is a positive attribute and HL offers all individuals equal opportunities. No one shall be discriminated against - regardless of ethnicity, colour, gender identity, sexual orientation, nationality,

parental status, marital status, pregnancy, religion, political opinion, racial and ethnic background, national extraction or social origin, social status, age, union membership, disability, or other forms of discrimination covered by Union regulation and national law. Harassment in the form of physical or psychological abuse is strongly prohibited within HL, as is any kind of intimidation or other threats. Employees in HL have a joint responsibility for this to be achieved. The details related to this are set out in Appendix B: Policy for employee diversity, inclusiveness and equality.

## 2.6 Purchase of sexual services and child pornography

We believe that purchasing sexual services is unethical. It is also illegal in many countries. Therefore, we strictly prohibit our employees from purchasing sexual services while on work assignments or business travel, irrespective of the local laws. This applies both during and after working hours and is irrespective of country of the assignment / work travel.

Sexual exploitation of children and child pornography is not only illegal in many countries but is a clear violation of human rights. Employees of HL are expected to comply with HL's policy, irrespective of country and both during and after working hours. To support our policy in this area and protect against child sexual abuse material we have installed a software system called NetClean ProActive onto our servers.

## 3. Environment

### 3.1 Precautionary approach

HL has a precautionary approach towards environmental challenges which means that we avoid dangerous materials when suitable and more environmentally friendly alternatives are available.

### 3.2 Environmental responsibility

HL is committed to reducing the environmental impact of its operations and contributing to sustainable development through proactive environmental practices. We ensure compliance with applicable environmental laws and international standards, demonstrating our dedication to responsible business operations.

To address sustainability challenges, HL assesses and manages the environmental impacts, risks, and opportunities throughout its entire material value chain, from upstream suppliers to downstream customers. Our approach prioritizes the efficient use of natural resources, including energy and water, and fosters responsible resource management.

### 3.3 Commitment to climate

As a company committed to the Science-Based Targets initiative (SBTi), HL has calculated its climate impact across Scope 1, Scope 2, and Scope 3 emissions and set science-based targets to limit global warming to 1.5°C and achieve net-zero emissions. Our strategies to achieve these goals include:

- Transitioning to renewable energy sources and enhancing energy efficiency.
- Increasing the use of raw materials with lower carbon footprint.
- Regularly reviewing and adapting our operations to align with global climate goals and evolving risks.

Through these measures, HL strives to contribute meaningfully to global sustainability efforts while minimizing its environmental footprint. Further details are provided in Appendix E.

## 4. Anti-corruption

HL's reputation of honesty, integrity and responsibility must be upheld and any involvement in bribery, extortion or corruption in any form is not tolerated by HL. HL makes active efforts to ensure that this does not occur within the company.

The term corruption refers to abuse of a position of trust for own or the company's gain, for example through the use of bribes. It is forbidden to offer, promise, or give, as well as request, accept a promise of, or receive a bribe. A bribe is a gift or other benefit that might influence another person, as part of their employment or duties, to show improper favour to the giver.

HL's employees may, for example, not offer, give, receive, or request gifts, services, entertainment, or other rewards that:

- Violate accepted business practice.
- Have an unreasonable value.
- Consist of money, securities, cash loans, or other types of personal payments in the form of discounts, commissions, bonuses or fees.
- Consist of pure leisure or vacation trips.
- Violate existing laws.
- Are other rewards which due to their value or other relevant circumstances are typically likely to improperly influence the recipient in the exercise of their professional duties or in another manner risk embarrassing the company or the employee in the event they become public knowledge.

This does not prevent HL employees from receiving or offering promotional gifts designed to retain and promote good business relationships with customers and other business partners. This subject to the condition that such gifts are modest, openly accepted and offered and otherwise compliant with this Code of Conduct. Management of respective subsidiaries are responsible for preparing appropriate guidelines and routines for employees concerning representation and gifts.

## 4.1 Consumer interests

When dealing with customers and end-consumers, HL acts in accordance with fair business, marketing and advertising practices. HL also ensures that provided goods or services meet all agreed and legal standards.

## 4.2 Competition

HL conducts its activities according to applicable laws and regulations and refrains from concluding unlawful anti-competitive agreements as well as exchanging unlawful price and/or market information with competitors.

## 4.3 Export control

HL shall comply with all applicable rules regarding export controls, including not acting contrary to, or with persons implicated in economic sanctions.

## 4.4 Conflicts of interest

HL employees shall always work in the company's best interest and avoid all acts that might be perceived as favouring a third party at HL's expense. Employees shall avoid all types of activities that violate the company's interest or have a negative effect on the employee's possibility to act with judgment and integrity. Agreements with or other forms of assignments to related parties shall be avoided and always be reported to and approved by the nearest manager or the company's Group management.



HL employees may not spread or abuse confidential information. This principle may be waived if specific permission has been given by the immediate manager. Examples of confidential information include non public information about HL's operations, financial position, strategies, business transactions, business plans, business processes, etc.

HL respects personal information and handles it carefully. HL respects individual personal information that the company can obtain or use in information processing and ensures that personal data in the operations is handled in accordance with applicable laws and regulations. Details are described in the HL Display Privacy Policy.

## 4.5 Relationships with external parties, such as suppliers and business partners

HL has a code of conduct for suppliers (see Appendix F), based on the same principles as the internal code of conduct, which all business partners must comply with.

## 4.6 Violations

HL will ensure that immediate action, such as termination of employment, is taken against those who violate this Code of Conduct and that circumstances in violation of applicable laws and regulations are reported to the relevant authorities.

Violations of the Code of Conduct shall be reported to the immediate manager. If such person is involved or otherwise disqualified, the reporting can be done with an e-mail to senior management, or if applicable, reported through HL's third-party [Whistleblowing service 'Speak Up'](#) (see Appendix D: Policy for Whistleblowing).

## 5. Implementation

New employees sign this Code of Conduct as an addendum to their employment contract and complete an online Code of Conduct module. We also require all employees to complete a short refresher module on Code of Conduct each year.

Managers are responsible for communicating a reminder of this policy annually, and Group HR will make sure the updated version is accessible on the intranet.

## Appendix B: Policy for employee diversity, inclusiveness and equality

**This policy was adopted by the Board of HL Holding AB and HL Display AB and is applicable to all subsidiaries in the group. The policy shall be revised as required and reviewed at least once a year.**

HL Display recognizes that it is essential to provide equal opportunities to all employees. We strongly believe that a broad diversity in our organization is a good condition for successful and innovative business, regardless of ethnicity, colour, gender identity, sexual orientation, nationality, parental status, marital status, pregnancy, religion, political opinion, racial and ethnic background, national extraction or social origin, social status, age, union membership, disability, or other forms of discrimination covered by Union regulation and national law.

We are committed to actively work for, and maintain, an inclusive workplace where the respect for human rights has high priority. We have zero tolerance for any discrimination or harassment of any sort.

This policy applies to different aspects of employment; working conditions, remuneration, recruitment, promotions, development as well as the possibility to have a family life outside of work. HL Display strives to create opportunities for all employees to combine parenthood and work. Taking parental leave should not create any obstacle for future promotion.

The working climate within the company shall encourage inclusiveness in a natural way. This applies to all groups of people who, for various reasons, have limited access to the labour market, and for whom we could enable employment or development by making reasonable adaptations to our working environment. In line with our dedication to inclusion and positive action, we actively support and integrate individuals from vulnerable groups, ensuring equitable access to resources and support for their success.

The objective of HL when recruiting is to employ people with the right competence, experience, mind-set and commitment. The goal is also to seek candidates who bring diversity into our teams.

Recruitment, placement, training, and advancement decisions are guided by procedures that prioritize qualifications, skills, and experience while recognizing that some individuals may face greater challenges in acquiring these attributes. This ensures a balanced and equitable approach to talent development and opportunity creation.

Salary and compensation decisions shall be based upon level of achievement (results and behaviours), accountability and complexity of the job to be done. All forms of discrimination must be avoided. Sexual harassment and discrimination are unacceptable and will lead to disciplinary action.

We shall comply with our policy by:

- Making employee diversity, inclusiveness and equality an integrated part of our operative business decisions.
- Implementing procedures to prevent, address, and mitigate discrimination, while promoting diversity and inclusion throughout the organization to ensure equitable opportunities for all.
- Providing employees training on non-discrimination policies and practices, with an emphasis on senior management, to raise awareness and develop effective strategies for addressing systemic and incidental discrimination.
- Equipping managers with the necessary information and support to comply with local legislation in employment decisions, while ensuring senior management takes responsibility for equal treatment and employment opportunities. Clear policies and procedures will guide equal employment practices, linking promotions to demonstrated performance in these areas.

- Evaluating job requirements to ensure they are not inadvertently disadvantaging specific groups.
- Establishing grievance procedures to address complaints and appeals, offering employees a clear recourse for raising concerns. This includes identifying and addressing both formal structures and informal cultural barriers that might discourage employees from voicing grievances.
- Committing to annually measuring HL Display's diversity, inclusiveness and equality initiatives. The minimum requirement is that it should be included in the global employee engagement survey and in the continuous improvements that follow the survey.
- Respecting EU directives and local legislation

## Appendix C: Policy for Working Environment, Health & Safety

**This policy was adopted by the Board of HL Holding AB and HL Display AB and is applicable to all subsidiaries in the group. The policy shall be revised as required and reviewed at least once a year.**

Providing a safe and healthy work environment is essential to our business success. We should provide a safe working place to all employees where no one gets hurt or injured. To achieve this, we implement a comprehensive workplace accident prevention policy and management system, designed to identify, assess, and mitigate risks effectively. Our ambition is to have a working environment where employees are safe, healthy and able to develop.

The health and safety work environment within HL Display should be an integrated part of all decisions that can directly or indirectly affect our employees. We do not accept any form of discrimination or harassments of any sort. Our work environment should be recognized as open to diversity and all employees should be handled with respect and in line with human rights. Local regulations within the field is the lowest limit for our health and safety work. We continuously strive to improve our organizational, social and physical work environment and the psychological wellbeing of our employees. We shall comply with our policy by:

- Making Health and Safety work a first priority and an integrated part of our operative business
- Cooperating between management and employee representatives to develop the work environment
- Making sure that managers have the knowledge, authorities, resources and support to keep a secure work environment in accordance with local regulations and policies
- Making adjustments to the physical environment to ensure health and safety for workers, customers and other visitors with disabilities.
- Providing an induction to all new employees to inform about all security protocols, safety equipment and any hazards within the applicable workplace
- Making a risk assessment of the physical and social consequences of potential organizational changes that directly or indirectly affect employees
- Providing all employees with the opportunity of having a documented annual development plan
- Having programs to promote access to skills development.
- Having all of our factories and distribution centres aiming for high working and environmental standards
- Committing to annually measuring, evaluating and improving our work environment in a global employee engagement survey
- Respecting European Health & Safety standards and working systematically to secure fulfilment of legal requirements
- Respecting employees' freedom of association in all our workplaces, according to the principles of ILO and UN.

## Appendix D: Policy for Whistleblowing

**This policy was adopted by the Board of HL Holding AB and HL Display AB and is applicable to all subsidiaries in the group. The policy shall be revised as required and reviewed at least once a year.**

### 1. Objectives

- To enable HL employees and other stakeholders to escalate a serious concern to a leadership level which is not immediately connected to the problem reported.
- To make senior leadership aware of suspected serious wrongdoings.
- To empower all HL employees and other stakeholders to 'speak up' – if we see something, we should say something.

### 2. Actions covered

The type of concerns covered by this policy is:

- Failure to comply with local legislation and/or HL Code of Conduct.
- Health & Safety issues.
- Unauthorized use of the company's money.
- Possible fraud and/or corruption.
- Actions which are unprofessional, inappropriate or in conflict with a general understanding of what is right and wrong, including sexual or physical abuse.

It is important for HL that people feel empowered to 'speak up' if they see or hear something which raises concerns related to the points described above.

### 3. Background

As reflected in our CR Policy and adherence to the United Nations Global Compact and EU legislation (in relevant markets), HL strongly believes in promoting equal opportunity in the workplace and high business ethics.

Instituting a Whistleblowing system further reinforces our commitment to be exemplary both in the way we treat each other as HL employees, and in our dealings with external business partners and stakeholders.

We believe that our Whistleblowing procedure helps us to minimize harm from any wrongdoings in our daily business operations throughout the markets where we operate and enables internal confidential communication.

### 4. Reporting a concern

We encourage employees to report their concern to their direct leader.

If the concern reported is linked to this leader or there is a concern around how it might be handled, reporting can be done with an e-mail to senior leadership, or directly to the management group. Reporting can also be done through our third-party Whistleblowing service, where the whistle-blower remains anonymous. Access to this external service is available through HLnet and also through our external website. The investigation process is described in our Whistleblowing guidelines, available on HLnet.

The team responsible for receiving reports and managing cases on the HL Global channel consists of Group HR Director, Group Marketing Director, and an owner representative from Ratos. In some legal entities in accordance with regulations we also provide local channels, where the local HR Business Partner is responsible for receiving and managing the cases.

External reporting will also be made available, where the employee's anonymity towards HL is maintained.

## 5. Confidentiality & support for whistleblowers

To the extent that the reported concern has been made in good faith, HL will ensure that the reporting party is:

- Kept anonymous, unless the concern leads to legal action, where the whistleblower may be asked to come forward as a witness.
- Kept unharmed from any repercussions, even if the claim turns out to be unfounded.

## 6. Implementation

Managers are responsible for communicating a reminder of the Whistleblowing policy annually, and Group HR will make sure the updated version is accessible on the intranet. HR will also build awareness through the annual Code of Conduct training and e-modules made available across the business.

## Appendix E: Policy for Environment and Sustainability

**This policy was adopted by the Board of HL Holding AB and HL Display AB and is applicable to all subsidiaries in the group. The policy shall be revised as required and reviewed at least once a year.**

This policy for Sustainability outlines HL's commitment to environmental sustainability and broader sustainable practices, addressing global challenges such as climate change and resource use. It aligns with the European Sustainability Reporting Standards (ESRS), reinforcing our dedication to minimizing environmental impact and promoting long-term sustainability.

We have a history of continuous improvement in our factories and operations, grounded in both efficiency and a precautionary approach. By embedding sustainability into our organizational culture and operations, we aim to minimize our environmental impact, optimize resource efficiency, and contribute to global climate action.

This policy applies to all aspects of our business operations, including manufacturing, product development and supply chain management. It also guides our interactions with stakeholders and our customers.

### 1. Commitment to climate action

We are committed to addressing climate change by reducing our greenhouse gas (GHG) emissions and aligning with the Paris Agreement goals. Specifically, we will:

- Continue to achieve the science-based targets we set and had approved by SBTi in 2022, committing to limit global temperature rise to 1.5°C.
- Transition to renewable energy sources and implement energy efficiency measures across our value chain to reduce Scope 1 and scope 2 emissions.
- Shift the material mix towards options with a lower environmental footprint and collaborate with our suppliers to reduce Scope 3 emissions.
- Regularly disclose our GHG emissions, including Scope 1, Scope 2, and Scope 3 emissions, in line with ESRS requirements.

### 2. Sustainable resource use

Efficient resource management is central to our sustainability efforts. We will:

- Increase the use of post-consumer waste and renewable materials to support a circular economy and transition away from the use of virgin resources.
- Incorporate eco-design principles to create durable and repairable products, when feasible, that are resource-efficient in manufacturing, transportation, and installation, with sufficient information provided for proper end-of-life treatment.
- Minimize waste generation, according to the waste hierarchy, by recycling as much of the waste generated in our production processes as possible and promoting recycling projects with our customers.
- Ensure safe handling and disposal of hazardous materials.
- Continuously improve and minimize the environmental impact on air, water, and other natural resources arising from our products, from a cradle-to-grave perspective.

### 3. Integration into business practices

Sustainability considerations are integrated into our decision-making processes, with specific focus on:

- Conducting double materiality assessments to identify and prioritize environmental impacts and opportunities.
- Aligning our sustainability objectives with the ESRS disclosures on climate change (ESRS E1) and resource use (ESRS E2).
- Monitoring and reporting our progress against established sustainability goals annually.

#### **4. Collaboration and engagement**

We recognize the importance of collaboration to achieve sustainability goals. To this end, we will:

- Engage with stakeholders, including employees, customers and suppliers, to promote sustainability awareness and action.
- Provide training and resources to employees to foster a culture of sustainability within the organization.
- Support our customers in their journey to create more sustainable stores by reducing the usage of virgin plastic, packaging waste, and food waste.

Ensure transparency by publishing sustainability reports yearly according to the ESRS.



## Appendix F: Code of Conduct for suppliers

### 1. Introduction

HL believes in social and environmental responsibility and ethical conduct and expects its business partners to do the same. HL is managed with long-term sustainability in mind, which also includes building sustainable relationships with our business partners. Furthermore, HL and its business partners have an obligation to all stakeholders to observe high standards of integrity and fair dealing. This is the foundation for and the reason why HL has created the Code of Conduct for suppliers.

HL's Code of Conduct for suppliers outlines the minimum standards we require our suppliers to comply with. It is based on core International Labour Organisation (ILO) conventions, the backbone of international labour law. We further adhere to the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We expect our suppliers to adhere to the same principles.

Since 2010, HL has been a member of the [United Nations Global Compact](#). The Global Compact's ten principles on human rights, labour, environment and anti-corruption have been an integral part of the company's strategy, culture and day-to-day operations.

#### **Who does the Code of Conduct for suppliers apply to?**

The Code of Conduct for suppliers applies to all our business partners that provide products or services to HL, such as e.g. suppliers (and subcontractors if used while engaging with HL) and consultants.

The Supplier shall ensure that all Requirements of the Code of Conduct for suppliers are cascaded to, and complied with, by its direct suppliers.

#### **Legal compliance**

HL requires all our business partners to operate in accordance with the principles in the Code of Conduct for suppliers and in full compliance with all applicable laws and regulations. The Code of Conduct for suppliers does not replace legislation and if the two are in conflict, legislation takes precedence. If the Code of Conduct for suppliers sets a higher standard than the existing legislation, the reverse applies. The Code of Conduct for suppliers is valid in the English language. Where there are different language versions of this document, these shall be considered translations only. The form in Appendix II can be used in order to sign the Code of Conduct for suppliers.

#### **Raising concerns**

Should you or your employees believe that the terms of the Code of Conduct for suppliers are not adhered to or that HL is not acting in accordance with its own HL Code of Conduct then we encourage you to raise your concerns to HL Head Office. For anonymity HL's third party operated Whistleblower function 'Speak Up' can be used. You'll find the link in Appendix B or here: [Whistleblowing service 'Speak Up'](#):

#### **Implementation and monitoring**

HL monitors the implementation and adherence of the Code of Conduct for suppliers. HL will assess its business partners' compliance with the Code of Conduct for suppliers. HL expects suppliers to allow HL, or a third party authorized by HL and reasonably acceptable to the supplier, to conduct audits and assessments of the supplier's operations relevant for the HL Code, including but not limited to the supplier's facilities. At the supplier's request, the parties involved in any such audit shall enter into a confidentiality agreement regarding the circumstances disclosed in the audit or assessment.

Violations will be handled immediately, and any violations of the Code of Conduct for suppliers may jeopardize the business partner's business relationship with HL, up to and including termination.

## 2. Human and Labour Rights

2.1. HL expects its suppliers and their suppliers to respect internationally recognized human rights, as set out in the Universal Declaration of Human rights. The Code of Conduct shall apply to all suppliers, including recruitment agencies.

2.2. The Supplier shall recognize the fundamental human and labour rights. In particular, the Supplier, including recruitment agencies, must not engage in or tolerate:

- restrictions of movement
- excessive recruitment fees or cash deposits
- confiscation of identity documents and/or passports
- withholding of wages
- abusive working conditions
- debt bondage
- violence
- any form of forced, compulsory or illegal labour, including trafficking, prison labour, child slavery or bonded labour or any other kind of exploitation or abuse.

2.3. The Supplier shall condemn and refrain from recourse to child labour and any form of forced or compulsory labour, and by doing such, shall commit to requirements of ILO Convention Nos. 29, 105 and 182 as well as the Modern Slavery Act 2015 when making business with HL Display legal entities in the UK.

2.4. The Supplier shall ensure a constructive dialogue with employees and their appointed representatives, as well as recognize the principles of freedom of association, protection of the right to organize and collective bargaining in accordance with ILO Conventions Nos. 87 and 98.

2.5. The Supplier shall commit to providing equal opportunities and non-discrimination by treating all employees and situations in a fair manner (ILO Convention Nos. 100, 111 and 135).

2.6. The Supplier shall comply with national legislation and practice for working conditions, including working time, salary wages, overtime pay, paid leave, benefits, social security, public and annual holidays (GSCP Reference Code).

2.7. The Supplier shall comply with national regulations regarding privacy and personal data protection. Suppliers processing personal data on behalf of HL Display shall commit to fulfil the requirements written in HL Display's privacy policy and written processing agreement between the parties.

## 3. Business Ethics

3.1. The Supplier shall comply with all relevant national and international legislation regulating foreign trade including the OECD Convention of November 1997, as incorporated into the legislation of 35 countries, as well as all other legal instruments pertaining to prohibition of bribery and economic crime in foreign trade, such as the UNO Convention signed in Merida in December 2003.

3.2. The Supplier shall avoid any situation that may create or appear to create a conflict between its management and/or employee's personal interests and the interests of HL Display and/or its employees.

3.3. The Supplier shall comply with all applicable laws and regulations relating to its business activities, including anti-trust and competition laws.

3.4. The Supplier shall not either directly or indirectly, pay, promise to pay, authorize the payment of, or transfer, money, or anything of value, or offer any inducement in any form to any employee, representative or related persons to HL Display, to secure any advantage or benefit in relation to doing business with HL Display.

3.5. The Supplier shall immediately inform HL Display in the event any of its employee has or may have a relationship with any employee of HL Display outside the scope of an ethical business relationship.

## 4. Sustainable Growth

4.1. The Supplier shall be fully committed to drive continuous improvements in the quality of its products, processes and people and deploying quality management systems.

4.2. The Supplier having access to HL Display intellectual property shall preserve the intellectual property rights of HL Display and respect those of third parties, including patents, copyrights and trademarks. Specifically, the Supplier shall have duly signed the Non-Disclosure Agreement (NDA) of HL Display.

4.3. The Supplier shall demonstrate a continuous effort to decrease his use of non-renewable energy, reduce water consumption and lower his carbon footprint.

## 5. Environmental Care

5.1. The Supplier shall ensure compliance with the environmental laws and regulations of the countries in which they operate and products are being sold by HL.

5.2. The Supplier shall be responsible to implement the appropriate organization to comply with the REACH requirements for products sold in EU and to support HL Display with all required information related to the application of the REACH legislation.

5.3. Supplier shall monitor, track and document its consumption of natural resources such as water and raw materials, as well as sources of energy in order to be able to identify aspects that Supplier can control and can influence, seeking opportunities for improvement and minimized consumption.

5.4. The Supplier shall ensure the appropriate management of waste materials, continuously minimizing their impact on the Environment and seeking recycling opportunities.

## 6. Health & Safety

6.1. The Supplier shall work systematically with health and safety and is committed to provide a safe work environment. Risks that can cause accidents or impair the health and well-being of individuals while working for HL shall be reduced. Therefore, occupational health and safety hazards shall be identified, evaluated and managed through a prioritized process of hazard elimination, engineering controls, and/or administrative controls.

6.2. The Supplier shall offer a safe work environment to their employees. It means, for example, that work areas are kept clean and free from pollution, machines used in production are safe and do not risk the health of the workers, and instructions regarding the use of personal protection and work equipment are adhered to. Personal

protective equipment and work equipment shall be provided to the workers. Further, the work environment shall be well lit, and have temperature and noise at acceptable levels. When noise is above acceptable levels, personal protective equipment such as ear protection shall be used. All units should provide adequate and clean changing rooms, washrooms and toilets, separate for men and women.

6.3. The Supplier shall store hazardous material and equipment according to applicable law. There should be clearly marked emergency exits. Exits must not be blocked and should be well lit. All workers shall receive information about the safety arrangements such as emergency exits, fire extinguishers, first aid equipment, etc. An evacuation plan should be displayed on each floor of a building. The fire alarm should be tested, and evacuation drills carried out on a regular basis.

6.4. The Supplier shall offer first aid equipment at appropriate locations, and at least one person in each location should be trained in basic first aid. The business partner shall cover the costs of medical care for injuries incurred on its premises if they are not covered by social security or insurance, provided safety rules have not been violated.

## Appendix A: Signatures

HL requests the Authorized Signatory/Legal Representative of your company reads through the HL Code of Conduct for suppliers and by signing below and affixing company seal, if applicable, confirms you have understood, and will comply with the HL Code of Conduct for suppliers.

I, the undersigned, Authorized Signatory/Legal Representative of the company set out below, confirm that the company has understood and will comply with the HL Code of Conduct for suppliers.

X

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Place, date

X

---

Company name

X

---

Signature

X

---

Name in block letters

X

---

Title

Document Name: HL Corporate Responsibility Policy  
Owner: Group HR Director  
Classification: Internal & External

Update/Approved: 2025-03-07  
Update approved by: HL Board of directors  
Next review: Q1 2026

## Appendix B: Report of non-compliance

If you are aware of a situation that may not be in compliance with the HL Code of Conduct for suppliers, please use the link below or on the HL Display external website to report it.

<https://report.whistleb.com/en/HL-Display>

### **2024-12 Changes to this document:**

Vision updated. Detail added to sustainability elements of the policy, to align with the disclosures outlined by the ESRS.

Key updates include:

- Environment: added details on resource use, including the transition away from virgin resources, the waste hierarchy, and our climate commitments.
- Social – Own Workforce: expanded on measures to address discrimination and enhance recruitment practices.

#### **Appendix D, Whistleblowing**

- Text clarified where to access the service. 4. Reporting a concern  
Access to this external service is available through HLnet and also through our external website.

### **2023-12 Changes to this document:**

#### **Appendix D:**

- Added a reference to the EU Whistleblowing directive (as well as the UN compact).  
Added more details about the local channels and who is responsible for managing them where they exist.
- Sentence added to link Whistleblowing to the code of conduct awareness training:  
HR will also build awareness through the annual Code of Conduct training and e-modules made available across the business.

**Appendix F.** Updated version of CoC for Suppliers added

### **2023-02 Changes to this document:**

#### **Appendix A: Code of Conduct**

Text added to 2.6. Purchase of sexual services and child pornography:  
To support our policy in this area and protect against child sexual abuse material we have installed a software system called NetClean ProActive onto our servers.

### **2022-09 No changes to this document**

### **2021-09 Changes to this document:**

#### **2. Background**

- Text added: *Our vision is to be the preferred partner for innovative and sustainable solutions delivering a better shopping experience. We bring this to life through our values: Ownership, Speed, and One Team.*

#### **Appendix B- Policy for employee diversity, inclusiveness and equality**

- Text updated: *The working climate within the company shall encourage inclusiveness in a natural way. This applies to all groups of people who, for various reasons, have limited access to the labour market, and for whom we could enable employment or development by making reasonable adaptations to our working environment.*

- o Updated wording to reflect how we compensate (not just 'level of difficulty and achievement')

#### **Appendix E: Policy for Environment and Sustainability**

- Text updated: *Consistently improving and working towards reaching our target of 100% internal or external recycling of our production waste*