



Husqvarna  
Group

# The Husqvarna Group Code of Conduct

Acting with Integrity



# Caring with Integrity begins with us

Our company has continuously and successfully reinvented itself – over centuries – by driving innovation and transformation in each industry segment we enter. We can all be proud of that legacy. We should be equally proud of our reputation as a Company with high integrity. As the Group Management of Husqvarna Group, we are committed to maintaining both aspects of our legacy as we drive our forward-leaning agenda into the future.

The rules and principles of the Code of Conduct (the “Code”) model how we care for our customers, investors, stakeholders and each other. As we boldly pursue new ideas and better ways of doing business, the Code will show you how to achieve those goals in the right ways. You are our number one ambassador. We need to walk the talk! The Code is intended to be a practical guide and provides examples explaining how these rules and principles would apply in a variety of situations.

We are passionate about [Shaping Great Experiences](#) and recognize that takes hard work. To truly shape great experiences we recognize the importance of doing the right thing while doing business. Knowing our Group Policies, applying good judgement, being honest, and speaking up are ways we can continue to Act with Integrity and build a Winning Culture. Together.



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# Acting with Integrity

## What is the Purpose of the Code of Conduct?

Integrity is fundamental to Husqvarna Group. The principles we work by are deeply connected to our everyday jobs: we are fair and honest in the way we conduct our business; we are all responsible for each other in the workplace; we are committed to sustaining our environment, and the safety and quality of our products are essential.

By **Acting With Integrity** and staying consistent with our Code of Conduct (the "Code"), we reflect the values of Husqvarna Group in all the countries where we operate.

The purpose of the Code is to provide our organization with standards and values so that we do what is right for our customers, business partners, shareholders, employees, communities, and the environment.

## Who Should Follow the Code?

**Together with other Group Policies, the Code forms the foundation for the way we work and applies to all employees, officers, and directors.**

All employees are expected to act following the Code, other Group Policies, and the law, i.e., act with integrity.

All managers are accountable for communicating and enforcing the Code and Group Policies within their respective teams and demonstrating (i.e., leading by example) the intent and spirit of the Code.

Failure to comply with the Code and Group Policies, including the failure to report a non-compliance, can result in disciplinary action, up to and including termination from employment. Husqvarna Group continuously evaluates and

selects business partners based on their ability to comply with the principles of the Code.

If a business partner does not comply with the Code and other applicable laws or regulations, we will request appropriate remedial measures and, if necessary, terminate the relationship.



Husqvarna Group is committed to the principles of the UN Global Compact, which aims at aligning businesses with human rights, labor, environmental care, and anti-corruption principles. (Husqvarna Group has participated in the UN Global Compact Initiative since 2013.)

The principles in the Code are also based on OECD Guidelines for Multinational Enterprises and the ILO Declaration on Fundamental Principles and Rights at Work.



# Be the Voice of Integrity

We are committed to conducting our business with the highest integrity. This requires not only that every employee knows and follows the Code and Group Policies but that every employee feels empowered to speak up and/or report violations or instances of non-compliance.

## Our Managers Lead by example

Our managers are expected to personally set the example for high integrity, not just with words, but with their actions. If you are a manager:

- Create an open environment in which every employee feels comfortable raising concerns.
- Communicate the importance of compliance with sincerity and conviction at every appropriate opportunity.
- Ensure that employees reporting to you understand that business results are never more important than compliance with the Code and Group Policies.



## How to Make the Right Decision

Consider the following for each action (or failure to act) in your day-to-day activities:



Is such action (or failure to act) lawful?

Is it consistent with the requirements and spirit of the Code?



How would I feel if my decision was reported on the front page of the local newspaper?

Would I feel comfortable if I had to explain it to my family members?



How would it affect Husqvarna Group's reputation?



## Speak Up and Ask Questions

If you experience or witness questionable behavior that doesn't seem right to you, then it probably isn't. In many cases (and if you feel comfortable doing so), the best course of action is to speak directly to the person engaging in the questionable conduct. Sometimes we all need to be reminded of the standards of behavior that are expected and defined in our Code. If you are uncertain or have questions about that conduct, then you should not hesitate to seek answers.

Ask questions and report suspected violations by any one of the following methods:



Your direct manager, a member of Human Resources or Legal Affairs



By email to the Compliance Office

[compliance@husqvarnagroup.com](mailto:compliance@husqvarnagroup.com)



Local reporting channels described in our Whistleblower Policy [\(link\)](#)



Contact the AlertLine online at [husqvarnagroup.ethicspoint.com](https://husqvarnagroup.ethicspoint.com) or by phone [\(link\)](#)

- For further information about our Speak Up Culture see our **Whistleblower** and other **Group Policies** on Connect / How We Work [\(link\)](#)
- See [Page 42](#) for additional information on reporting suspected violations



# We conduct our business Fairly and Honestly

*Husqvarna Group and each of our employees are expected to follow the laws and regulations in each country where we operate. The Code sets forth the minimum level of acceptable behavior, but local laws may require a higher standard.*

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## Competition Principles

We compete in the marketplace in a manner that is both ethical and fair, without engaging in any inappropriate activities or unfair trade practices.

You must never agree or collude with other companies to fix prices, allocate markets or manipulate any bidding process.

You must never gather market information or competitive intelligence through illegal or inappropriate means.

### Example 1

You talk to a competitor's employee at a trade show, and you are asked to discuss your difficulties with a mutual retailer including your share of sales and profit margins.

Immediately make it clear that you cannot discuss such matters and inform your manager and Legal Affairs of the conversation.

### Example 2

One of our dealers offers to share with you a competitor's price list by using the dealer's log-in information to the competitor's intranet.

You must refuse this offer. You can collect information about a competitor from all public sources such as websites, brochures, and annual reports. However, neither you nor anyone on your behalf can obtain commercially sensitive information from a non-public source.

### Example 3

You attend an industry association meeting with competitors to discuss and learn about product standards. One of the competitors would also like to talk about increased pricing requests from a mutual raw material supplier.

You must stop the discussion or otherwise leave the meeting and ask that the minutes reflect your departure. Also, inform your manager and Legal Affairs of the discussion.

### What should I do?



- You have a responsibility to understand the company's **Competition Law Policy** ([link](#)).
- You may not discuss or exchange sensitive commercial information with our competitors.
- You should avoid contact of any kind with competitors which could create the appearance of an improper agreement or understanding.





## Anti-Bribery and Gift-Giving

We strictly prohibit corruption or bribery in any form, in every country around the world, in both the private and government sectors. This includes any situation where any of our employees know, or have a reason to know, that our business partners are engaged in bribery or corruption related to our products or offerings.

You should not receive or offer any gift to a government official. You should not offer a gift or anything of value, whether directly or through a third party, to any customer or business partner to obtain or retain business or to gain any other advantage.

Likewise, you must not accept gifts or anything above a modest value including benefits, reimbursements, or entertainment, whether directly or through third parties, that could affect, or even appear to affect, your objectivity or professional judgment.

Making or allowing so-called “facilitation payments” to expedite routine administrative actions by a governmental entity or officials is also prohibited. Any requests for facilitation payments must be declined and reported to Legal Affairs.

### Example 1

An employee from a Husqvarna Group supplier invites you to an evening of dining out and a sporting event.

You should not accept a gift/hospitality unless it is of modest value, and it would be offensive not to accept. Even if you believe that the offer does not affect business relationships, you should avoid accepting such offers.

### Example 2

A vendor of technology that the company is considering invites you to a sponsored weekend seminar. The vendor offers to pay for the travel and hotel costs. The seminar information would also be useful in considering the value of the technology.

Unless the company agrees to pay for all the costs of attendance, you should decline the invitation to avoid the appearance that you were influenced in your technology choice by the vendor’s sponsored weekend.

### Example 3

An agent claims to have good relations with the government and can get a building permit issued quickly, but the fee of the agent is unusually high.

The high fee signals that a portion of the fee might be used as a bribe, and you should decline to use the agent to perform the services.

### What should I do?



- You have a responsibility to understand the company’s **Gifts and Entertainment Policy** ([link](#)) and **Anti-Corruption and Anti-Bribery Policy** ([link](#)).
- You should never offer, promise, or authorize a payment or the giving of anything of value to anyone to obtain an improper business advantage.
- When using third parties such as distributors or agents, you must require that they conduct business with the same level of integrity and honesty, including avoiding the payment or offer of gifts or bribes.
- You should be suspicious of any request to make a payment to a person who is not related to the transaction being discussed — or a request that payments be made in another country or to a third party.
- Always report the receipt of any gift(s) (other than of nominal value) to your manager or HR. Remember that transparency is essential.

### Example 4

A dealer intends to take advantage of a government subsidy program whereby the customers of our products sold by the dealer are eligible to receive rebates/subsidies from the government. In connection with such a subsidy program, the dealer asks you to provide pricing information to the government that is false or misleading.

You must immediately refuse to provide such false or misleading information and inform the dealer that Husqvarna Group will not be a party to any collusion that could mislead the government in connection with such a subsidy program.



## Reliable Financial Reporting

All entities within Husqvarna Group shall apply uniform accounting principles to achieve consistent and comparable financial information. These accounting principles are defined in the Husqvarna Accounting Manual, which is fully compliant with International Financial Reporting Standards (IFRS) and IFRIC interpretations as adopted by the European Union.

All accounting and reporting must be conducted accurately and at a high level of quality.

For statutory compliance, all entities also need to comply with local Generally Accepted Accounting Principles and local laws in their books.

## Conflicts of Interest

You should never use your employment with Husqvarna Group for personal gain. In addition, unless approved in advance by your manager and HR (see “waiver” process below) you should not:

- Engage in external financial interests that might conflict with Husqvarna Group’s interests.
- Initiate or maintain personal or family financial interests in any operation or company that has business relationships with Husqvarna Group.
- Engage, with or without compensation, in activities that might conflict, or appear to conflict, with Husqvarna Group’s interests.

Any such relationships or activities must be disclosed in advance to your manager and HR for them to determine if it is appropriate.

### Example 1

Your spouse has just been hired by a supplier who has recently placed a bid with Husqvarna Group.

You should immediately report the situation to your manager and HR for them to determine whether a conflict of interest can be managed, or the supplier’s bid must be rejected.

### Example 2

You are considering working part-time with an equipment rental agency that sells and leases various brands of outdoor power equipment.

You should discuss the matter with your manager and HR for them to determine if a conflict of interest exists.

### What should I do?

- You have a responsibility to understand the company’s **Financial** [\(link\)](#) and **Accounting Policies** [\(link\)](#) and the **Husqvarna Accounting Manual** [\(link\)](#).
- To maintain the high quality of our reporting and consolidation systems, you must strictly comply with the Husqvarna Accounting Manual and ensure that all reporting is correct, kept up to date, and timely.
- **Be the Voice of Integrity** and immediately contact your manager or report to AlertLine if you suspect any fraud or inaccuracies in the accounting records or data systems.



### What should I do?

- You have a responsibility to understand the company’s **Conflicts of Interest Policy** [\(link\)](#).
- You should avoid even the appearance of any conflict of interest and **Be the Voice of Integrity** by disclosing to your manager and HR any potential conflict of interest.
- A family member may be hired by the Husqvarna Group with prior approval from your manager’s manager (“grandparent”), however, family members cannot report to each other in the same management reporting chain.
- You should disclose financial interests you (or a family member) may have in a company where you could personally affect Husqvarna Group’s business with that company.





## Political Involvement

We observe strict neutrality regarding political parties and candidates. Neither the names nor resources of Husqvarna Group shall be used to promote the interests of political parties or candidates.

You should not make any contribution on behalf of the company to any candidate for public office, political parties, or other political organizations, except through industry associations.

## Donations and Sponsoring

Charitable donations and sponsorships must be free from any suspicion of bribery or conflict of interest whether direct or indirect and should be supported and documented by HR and following the Group's Delegation of Authority Policy ([link](#)).

You must ensure that charitable donations and sponsorships are never offered as an incentive or reward for obtaining or retaining business, or for any other improper purpose.

## Insider Trading

Husqvarna AB (publ) is a publicly traded company and as such, is subject to various laws regarding "insider trading", i.e., trading on information that has not been made public and the disclosure of which could affect the Husqvarna AB share price.

You are not permitted to trade in shares of Husqvarna AB (publ) if you have such inside information, nor can you share any information that a reasonable investor would take into consideration in a decision to buy, hold or sell securities of Husqvarna AB (publ).

### Example

You learn through your work that Husqvarna Group intends to announce soon that it is buying another company, which could cause the price of Husqvarna shares to increase. You have a friend who is currently considering selling his Husqvarna AB shares. You consider telling your friend that he should hold off selling.

Do not inform your friend under any circumstances. Since the information is not public, but inside information, you are not permitted, and it is a criminal offense to share this information with others.

### What should I do?

- Any political activities in which you engage cannot be conducted on behalf of Husqvarna Group. You are acting on your own time and only in the capacity of a private citizen.
- You may only engage in lobbying or other legislative activity on behalf of the company if you have the authority to do so.



### What should I do?

- You may only respond to a funding request on behalf of Husqvarna Group with authority from your manager and HR.
- You should not personally benefit from the company's support of a charitable cause.



### What should I do?

- You have a responsibility to understand the company's **Insider Policy** ([link](#)).
- Your knowledge of Husqvarna Group's business activities, which may influence the share value of the company, shall be considered highly confidential and must not be disclosed outside the company, including with family and friends.





## International Trade Compliance

We comply with all Trade Compliance regulations, laws, and requirements that regulate the transfer of goods and technology.

All transactions, regardless of whether goods or technologies are crossing borders or transferred within the same country, may be subject to national and international customs, import or export control regulations, trade sanctions, and processes that have been put in place to ensure compliance with International Trade laws.

“Export control laws” regulate the cross-border shipment of goods, software, and technology that could be used for military or weapons purposes. Some countries also control the release of technical data to foreign nationals within their borders. “Trade sanctions” are restrictions on doing business with individuals, businesses, or governments.

You should always know what you are exporting, its destination, the end-user, and the end-use. Our employees must also provide Customs Authorities with complete and accurate import documentation including complete product descriptions when classifying goods.

## Working With Reputable Business Partners

Husqvarna Group partners with suppliers, service providers, agents, and distributors with whom we can build mutually beneficial business relationships.

We conduct business only with reputable business partners that demonstrate compliance with all applicable legal requirements and Husqvarna Group guidelines relating to labor, employment and environment, and health and safety standards. Husqvarna Group requires all suppliers and service providers to comply with the Supplier Code of Business Ethics.

We also conduct third-party due diligence screening on new significant business partners to ensure that they do not have a record of engaging in unethical business practices.

Husqvarna Group is also committed to complying with laws against money laundering and terrorism financing which are in place in most countries. Money laundering occurs when funds or other assets originating directly or indirectly from criminal offenses are placed into the economy making their source appear legal.

### What should I do?

- You have a responsibility to understand the company’s **Export Controls and Trade Sanctions Policy** ([link](#)).
- You should be aware that there are persons and countries with which Husqvarna Group is prohibited from trading. Please review the company’s Trade Sanctions Process.



### What should I do?

- Understand the requirements of the **Supplier Code of Business Ethics** ([link](#)) and the **Third-Party Due Diligence Policy** ([link](#)).
- Always report issues and concerns related to business partner relationships. **Be the Voice of Integrity** and speak with your manager or Legal Affairs or report into AlertLine if you see unsafe conditions in supplier facilities, supplier employees who appear to be underage or subject to forced labor, or any apparent disregard for environmental standards at supplier facilities.





# We carefully manage our Company Assets

*Husqvarna Group is committed to protecting its assets from damage, theft, or misuse. You have access to and control over many company assets including physical items, intellectual property, and electronic information. We rely on you to safeguard company resources and use them appropriately.*

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## Records Management

All employees are responsible and accountable for the information in their possession and the records they control. We have adopted a Record Retention and Management Policy ("Record Policy") which addresses the retention, use, and disposal of company records following business needs, prudent records management practices, and laws.

The Record Policy applies to all forms of business records and data that are created, collected, or stored in any format, including paper, electronic, or otherwise ("Records"). The Policy also provides schedules of retention for various categories of records to establish how long they must be retained before being destroyed.

## Data Privacy

We take privacy rights seriously and are committed to international compliance with data privacy laws. It is imperative that we only collect, store and use data that identifies a person, whether an employee, a customer, or otherwise, lawfully and transparently.

When we gather and process personal data, we are guided by the principles of Lawfulness, Fairness, and Transparency; Purpose limitation; Data minimization; Accuracy; Retention; Integrity and Confidentiality; and Accountability. These principles are the basis for policies and procedures that we have developed, and which must be consistently applied when processing personal data within Husqvarna Group. You can read more about the meaning of the principles in the Husqvarna Group Privacy Policy.

## Intellectual Property

Intellectual property (including patents, trademarks, trade secrets, and know-how) is one of Husqvarna Group's most valuable assets. We use a variety of tools to protect our IP, some of which create enforceable legal rights.

Husqvarna Group expects its employees to safeguard the company's IP and associated rights. This means, for example, not publicly disclosing an invention before it is appropriate to do so. Furthermore, we expect our employees to respect the IP rights of third parties.

The IP Department is responsible for managing the company's IP rights and handling most IP-related matters. The IP Department works together with Legal Affairs to enforce the Group's IP rights.

### What should I do?



- You have a responsibility to understand the company's **Record Retention & Management Policy** ([link](#)).
- You are personally responsible for actively managing your hard copy and electronic records consistent with the Records Schedules.
- Comply with any instructions you receive, such as litigation hold orders or directives to dispose of obsolete records.
- Only store electronic records including emails on company-sponsored storage sites and do not send company records to personal storage.

### What should I do?



- You have a responsibility to understand the company's **Privacy Policy** ([link](#)).
- You must ensure the protection of "personal data" related to our employees as well as our customers, suppliers, and consumers.
- You must not access, collect, store, process, or share personal data without proper authorization.

### What should I do?



- You have a responsibility to understand the company's **Intellectual Property Policy** ([link](#)).
- You must safeguard Husqvarna Group's IP and associated rights and only use the same for legitimate business purposes on behalf of the company.
- You must support the IP Department in managing Husqvarna Group's IP rights and seek guidance, as appropriate, from the IP Department on IP-related matters.



## Protecting Information Assets

To remain competitive and continue to deliver innovative technology, we seek to protect our networks, systems, devices, and information assets.

We must keep our critical business information confidential, accurate, and available. Information assets may exist as digital information or as paper documents and include:

- Intellectual property & trade secrets
- Business plans
- Source code
- Product development information
- Financial records, financial, and accounting data
- Customer and dealer information
- Pricing information
- Any other confidential information and processes which may be created in the course of the business

Everyone who has access to Husqvarna Group information, or to information entrusted to Husqvarna Group by third parties, is obligated to protect this information.

### Example 1

You receive an unexpected email from a Husqvarna Group employee containing an attached file that needs reviewing.

You should confirm that the email is not a phishing attempt by calling the sender. Remember that hackers can easily manipulate addresses or can compromise legitimate accounts.

### Example 2

You are on a business trip at the airport and your backpack and laptop are stolen.

You must immediately report this incident to the IT Service Desk and your manager following the [Data Breach Instruction \(link\)](#).

## Security Routines and Incident Management

We are committed to ensuring the security of our people and operations globally. Our security routines, emergency planning, and crisis management plans include processes for identifying and protecting against the risks posed by man-made, serious incidents, or natural hazards that affect our employees, operations, facilities, or products and services.

### What should I do?

- You have a responsibility to understand the [Information Security Policy \(link\)](#) and the [Information Protection Instruction \(link\)](#).
- You must prevent unauthorized or accidental access, loss, disclosure, or destruction of Husqvarna Group and confidential third-party information. This requires you to:
  - Never share credentials (e.g., passwords) with anyone or use them on external websites.
  - Use encryption when sending sensitive material externally.
  - Ensure that documents are appropriately secured, not left unattended, and disposed of properly.
- You should not share confidential information unless there is a legitimate business purpose to do so. Where a third-party needs to receive confidential information, there must be a confidentiality agreement (or corresponding professional duty of confidentiality) in place before sharing the information.
- You should immediately report information security breaches consistent with the Data Breach Instruction. If you have concerns that an information security breach has occurred due to misconduct, then you may also report using the AlertLine.



### What should I do?

- You have a responsibility to understand the company's [Security and Loss Prevention Policy \(link\)](#) and [Crisis and Business Continuity Management Policy \(link\)](#).
- Be an active participant in loss prevention, crisis management, business continuity, and workplace violence prevention drills and security awareness sessions to ensure you know how to remain safe at work, at home, and on the road.
- Comply with Husqvarna Group travel policies. You should make use of the company's Travel System when planning travel.





## Communication and Social Media

We are all an important part of Husqvarna Group's brand, and communication is an important tool for managing our company internally and externally. All communication should be planned to the extent possible in the context of Husqvarna Group's strategic objectives designed to create the best possible business environment for our operations and employees.

When we communicate both internally and externally, we should always engage in truthful, factual, and well-balanced communication. As we are a publicly traded company, it is also essential that the credibility of all our financial communications is maintained. Only the CEO, CFO, and designated persons determined by Corporate Communications are permitted to speak with the media in compliance with the Communication Policy.

Additionally, all employees using company owned electronic communication are subject to the company's Electronic Communication Policy.

Husqvarna Group's electronic communication should not be utilized to conduct any activity that violates any law or regulation or jeopardizes the security or reliability of the company's records or data, including trade secrets and other confidential business information.

### Social Media

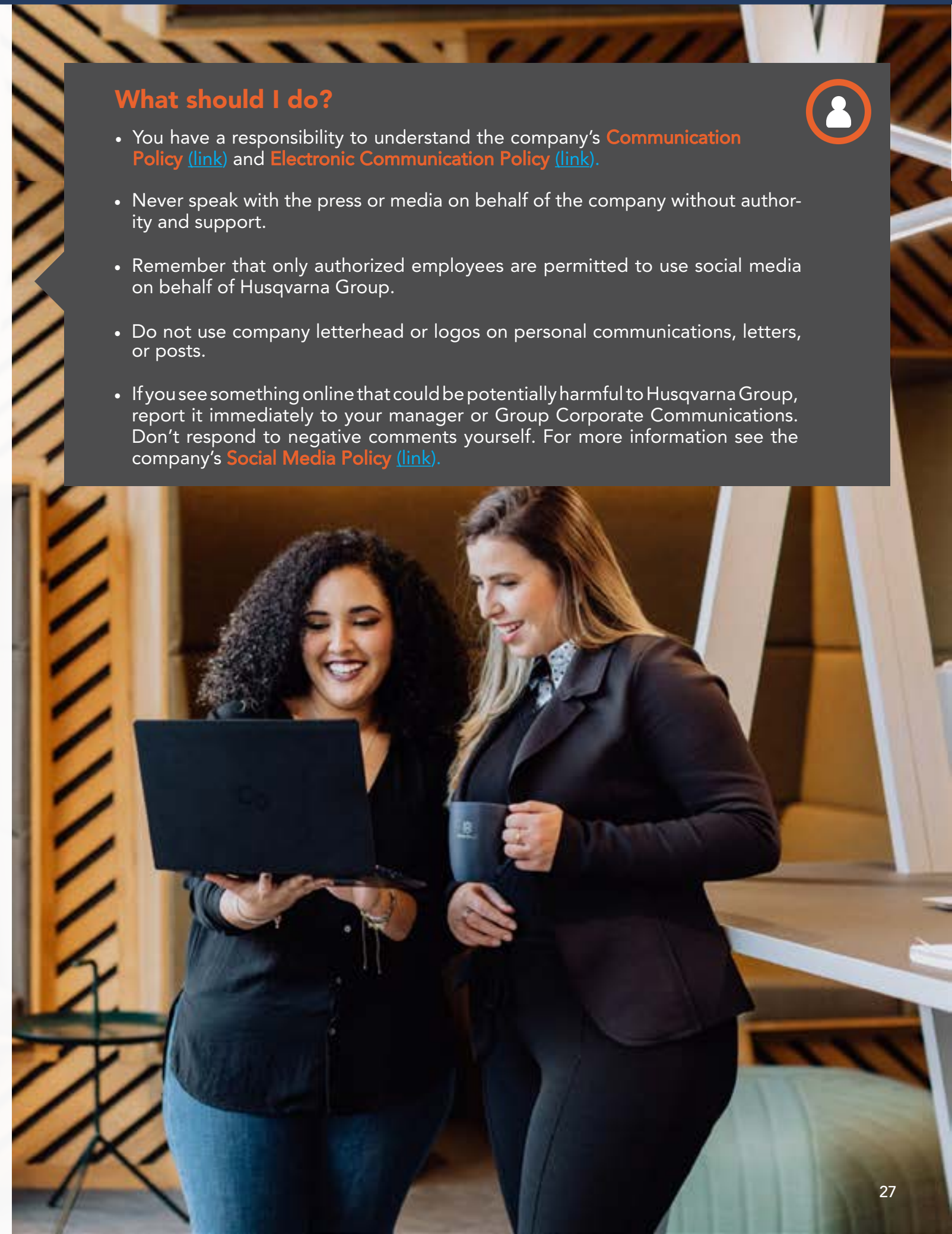
If you identify as a Husqvarna Group employee on social media, then the information that you share about our company may be viewed as an official message from Husqvarna Group. When your content regarding a Husqvarna Group product or service could be relied upon by the public, then you should indicate that the views are your own and do not reflect those of the Company. Additionally, you are obligated to follow the Code when posting information including:

- Protecting the confidentiality of business information.
- Avoiding disparaging, discriminatory, or harassing comments toward other employees, customers, vendors, or our business partners.
- Avoiding the use of Husqvarna Group's trademarks or logos in a manner that would mislead or confuse the public.

#### What should I do?



- You have a responsibility to understand the company's **Communication Policy** ([link](#)) and **Electronic Communication Policy** ([link](#)).
- Never speak with the press or media on behalf of the company without authority and support.
- Remember that only authorized employees are permitted to use social media on behalf of Husqvarna Group.
- Do not use company letterhead or logos on personal communications, letters, or posts.
- If you see something online that could be potentially harmful to Husqvarna Group, report it immediately to your manager or Group Corporate Communications. Don't respond to negative comments yourself. For more information see the company's **Social Media Policy** ([link](#)).





# We are Fair, Inclusive, and Respect all People

*Husqvarna Group supports and respects the protection of internationally proclaimed human rights standards and ensures that we are not complicit in human rights abuses.*

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## Fair Employment Conditions

We provide equal employment opportunities to all individuals without regard to gender, race, religion, age, disability, sexual orientation, gender identity or expression, nationality, social or ethnic origin, citizenship, union affiliation, political opinions, or any other characteristics protected by applicable law.

Employment terms and wages shall be fair and reasonable. We comply with applicable laws and industry standards on working hours. All employees, including those temporarily employed, should have their employment conditions in writing and be made aware of their employment responsibilities.

## No Forced or Child Labor

We do not tolerate child labor in our operations or in the operations of any supplier or other party with whom we partner. The minimum employment age is 15 years or the lawful age for working in the country in question.

We do not allow illegal, involuntary, bonded, or forced labor, human trafficking or any form of slavery in our operations or the operations of any of our business partners and are committed to taking the necessary steps to prevent it within our operations and supply chain.

## Embracing Inclusion and Diversity

We strive to attract, develop and retain a workforce that is as diverse as the markets we serve. We recognize that our differences are our strengths and aim to create a company that is built by our differences to ensure an inclusive work environment for all.

We define diversity in the broadest sense, including such aspects as age, race, ethnicity, gender, sexual orientation, cultural identity, disability, and overall life experiences. It also includes – very importantly– diversity of thought.

Regarding inclusion, we refer to a culture where all unique voices have a seat at the table and are heard. The full potential of diversity can only be unlocked if these unique voices and differing points of view are an equal part of any discussion.

Lastly, diversity and inclusion are imperative for our success as it leads to better ideas, innovation, and decision making, as well as a better workplace.

### What should I do?



- You have a responsibility to understand your employment conditions and rights.
- As a manager or supervisor, you have a responsibility to lead by example to promote fair working conditions.

### What should I do?



- You should immediately notify your manager or HR should you become aware of or suspect that in any of our operations or that any of our business partners are using forced or child labor.

### What should I do?



- You should always encourage a work environment in which everyone is appreciated and valued for their differences.
- Participate in and manage diverse teams in a manner that leverages each member's unique contributions.
- Avoid excluding individuals from teams or projects who are diverse from you and actively seek to mentor others who are likewise not similar.



## Employee Health and Safety

We are committed to maintaining a safe and healthy work environment for all of our employees and any other person working in Husqvarna Group facilities. Our vision is to have zero workplace accidents and injuries. We are committed to creating a respectful and secure work environment that is free from harassment, and that respects all applicable labor rights.

The use of illegal drugs in the workplace is not tolerated. The use of alcohol is not permitted during normal work operations but may be allowed in moderation at officially sanctioned social events as approved by the site manager.

## Freedom of Association

All employees are free to exercise the right to form, join or refrain from joining unions or similar organizations and to bargain collectively or individually.

## Anti-Harassment

We are committed to a work environment that is free from harassment of any kind and/or any other offensive or disrespectful conduct. The following are all examples of harassment that will not be tolerated and are subject to disciplinary action:

- Slurs or offensive jokes based on a person's gender, race, religion, age, disability, sexual orientation, gender identity or expression, nationality, social or ethnic origin, or other characteristics.
- Uninvited touching or intimidating gestures such as blocking a person's movements.
- Sexually offensive comments including requests for sexual favors or repeated invitations for dates when the other person has declined.

### Example

Brenda has recently accepted a new role, which requires her to work closely with Mark. At first, she is flattered when he compliments her looks, but as time goes on, his comments become more personal. Together on a business trip, Mark invites Brenda to his room. Brenda refuses the offer and is upset by this behavior, but she wants to handle this the right way. What should she do?

Brenda should report the matter to her manager or HR. Mark's unwanted attention is creating a work environment that is uncomfortable for Brenda and his behavior should stop immediately.

### What should I do?

- You should take the time to understand the safety and health risks in your work environment as well as the actions that are necessary to prevent them.
- You must alert your manager or HR if you become aware of hazards or standards that are being ignored or hidden.
- When conducting company business and traveling you have the responsibility to exercise sound judgment for safe conduct and become familiar with the [Group Travel Policy \(link\)](#).



### What should I do?

- You have the right to appoint worker representatives and form worker's associations or join trade unions of your choosing.
- Your decision whether to join a trade union or form a worker's association is an individual choice and you will be respected regardless of which decision you make.



### What should I do?

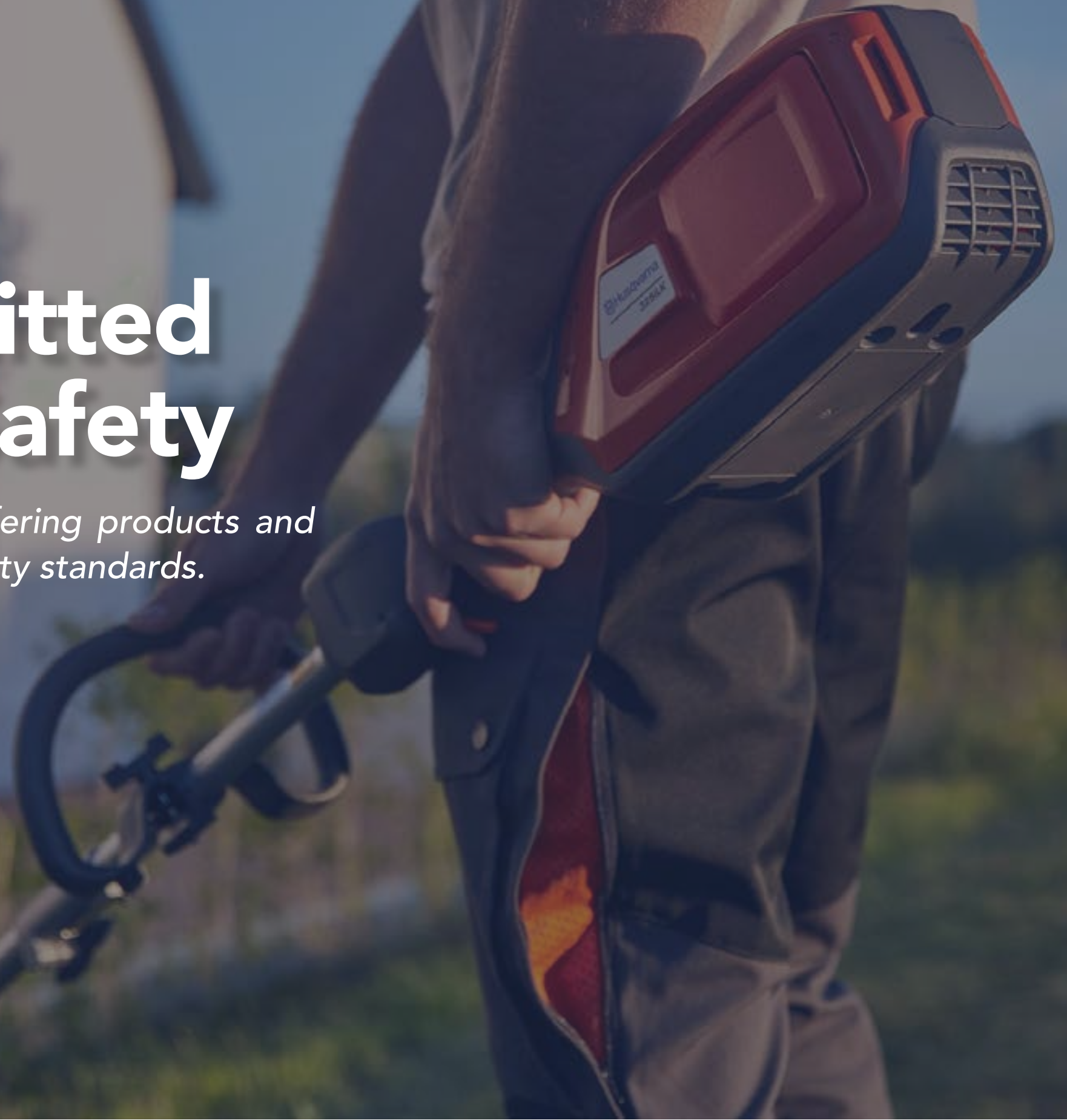
- If you experience or witness harassing behavior of any kind, then **Be the Voice of Integrity** and speak up and/or report it immediately. For more information see the company's [Anti-Harassment Policy \(link\)](#).





# We are committed to End-User Safety

*Husqvarna Group is committed to offering products and services to the highest safety and quality standards.*







## Safety and Quality

Our Core Purpose of Turning Technology into Opportunity means that we have a passion for innovation and a commitment to raising the bar on product safety and quality.

As a result, product safety and quality are always considered in the development of products and processes, from product ideas to product delivery, operation, maintenance, and disposal across all our operations.

We are also committed to developing new products ethically and responsibly, and following all applicable safety and compliance standards in the relevant markets.

Among other things, this means that all Products manufactured and/or supplied by us should:

- Comply with all applicable laws, regulations, safety standards, industry standards, and voluntary agreements in the markets where distributed, as described in the Group's Product Safety and COPS Reporting Policy.
- Meet the requirements of the Group's Product Compliance Policy.
- Fulfil the customers' and the end-users' reasonable expectations in terms of product safety.

### What should I do?



- You have a responsibility to understand the company's **Product Safety and COPS Reporting Policy** ([link](#)) and **Product Compliance Policy** ([link](#)).
- Continuously strive for product improvement and operational excellence.
- Be the Voice of Integrity and report any product quality concerns to your manager.
- Listen to our customers (both internally and externally) and attempt to understand their needs and challenges before agreeing on product requirements.





# We aim to reduce our Environmental Impact

*Environmental care is a Husqvarna Group business value which is built upon compliance and continual improvement principles involving the entire Husqvarna Group's value chain.*





## Sustainability

For Husqvarna Group, the term “sustainability” means that, in addition to generating value for our shareholders (profit), we must consider the impact of our business on the environment (the planet) and society as a whole (people). We are convinced that consistently acting sustainably – by considering all three of these aspects in our decision-making – will lead to greater long-term value for our shareholders.

A key part of our sustainability efforts, we are committed to reducing our overall impact on the environment, especially in terms of greenhouse gas emissions from all stages in our value chain, i.e., from the design of our products, through the manufacturing and distribution process, and ultimate use of our products by end-customers. For example, we strive to utilize only environmentally friendly, advanced, and efficient materials, and technologies, which we implement throughout the full life cycle of our products.

More generally, we ensure that we manage natural resources carefully and consistently to reduce the environmental impact and to comply with environmental laws and regulations in support of the Group’s sustainability objectives.

We have set ambitious goals to minimize our environmental footprint by reducing greenhouse gas emissions, decreasing waste, and limiting water and energy use at our facilities. These efforts are not only our duty, but they also support driving innovation, increasing regulatory certainty, strengthening investor confidence, and improving profitability and our competitiveness.

### What should I do?



- You have a responsibility to understand the company’s **Environmental Policy** ([link](#)).
- You have a responsibility to comply with the applicable laws and regulations related to the environment.
- You have a responsibility to understand the environmental impacts of your daily work and the preventative actions you can take to reduce them.
- You should consider the environmental consequences of wasting energy, water, and other resources in your work and make or suggest improvements where you can.
- You seek to re-use and recycle materials as much as possible and you report and share information regarding any incidents or hazards.



# Reporting Concerns

## Reporting Suspected Violations

If you are uncomfortable or unsuccessful in directly addressing individual conduct or for matters involving serious misconduct or fraudulent behavior, you have a responsibility to report your concerns by any one of the following methods (either verbally or in writing):

- To your direct manager (assuming such manager is not involved in the potential misconduct).
- To any member of Group Legal Affairs or Human Resources.
- By sending an email to the Compliance Office at [compliance@husqvarnagroup.com](mailto:compliance@husqvarnagroup.com).
- Any of the other local reporting channels described in our **Whistleblower Policy** ([link](#))

You can also contact **Husqvarna Group AlertLine** online at: [husqvarnagroup.ethicspoint.com](https://husqvarnagroup.ethicspoint.com) or using the telephone numbers on Connect / How We Work ([link](#)). If you call, the toll-free AlertLine is available 24/7 in multiple languages. You may decide to remain anonymous but if you choose to self-identify, then you may be contacted for further information.

## What Happens When I Report?

All reports that are received, whether verbally or through email or the AlertLine, will be immediately evaluated and an investigation opened where warranted. Relevant details that you provide are recorded and if you self-identify, then someone from Legal Affairs, Compliance, or HR may contact you for further details.

We will do our utmost to keep the information you provide confidentially, and we will only disclose information necessary to investigate.

However, in some cases involving serious matters of potentially unlawful or criminal misconduct it may be necessary for the company to share the information with law enforcement. Also remember that the privacy of all employees must be respected and in many cases, you may not be informed of the results of an investigation involving another employee.

Note that employees cannot exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be considered in determining the appropriate course of action.

## Our Commitment to Preventing Retaliation



Ethical values and integrity are of greatest importance to Husqvarna Group and cannot be preserved if individuals are reluctant or afraid to raise or report a concern or suspected breach of our Code, Group Policies, or the law. Rest assured, if you voice your concern in good faith, there will be no retaliation taken against you.

Any employee who engages in retaliation will be subject to disciplinary action. If you believe that you have experienced retaliation, you should report it as suspected misconduct.







Husqvarna  
Group