

March 2018

Code of Conduct

Introduction

HL Group has become a globally operating company in the field of traditional wholesale business. Our operations and decisions are facing new set of challenges every day. The world is constantly changing and because of this, it is important that we have defined guidelines to lead our operations.

Our Code of Conduct applies to all our employees. Everyone from our staff must know the Code so well that they can continually implement it in their own daily work. Besides the Code, we have also defined a set of more specific guidelines for our operations.

We address responsibility in all our operations and expect also our stakeholders, such as Suppliers, to do the same.

Our values - Respect, Commitment, Simplicity, Profitability and Fun - are the cornerstones of all our operations. These values combined with responsibility, obeying the law and our ethical principles are forming the Code that we follow. The Code is a part of our daily operations, but it will also improve our and our stakeholders interests in a long term.

Respect

We treat our colleagues, customers, suppliers and all players in the network with respect and in the way we ourselves would want to be treated.

We act with honesty, integrity and consistency in all that we do. We respect diversity and show respect towards different viewpoints and use these to build best performing teams.

Commitment

We show commitment in everythingwe do. We commit ourselves to set targets and deliver as agreed and designed.

We show commitment also by constructive challenging of each other in order to create excellence.

Simplicity

We encourage all employees in simplicity. In practise it means clear communication all the way from Company Vision to everyday operations.

We streamline and simplify both in customer interface as well as internally to gain efficiency.

Profitability

We understand that profitability is a key requirement for our existence. We understand what makes us profitable and we work hard every day to improve it. Profitability enables us to screen and maintain a best in class work force and offers an opportunity for individuals to grow their career in our company. It also enables us to contribute to well-being.

Fun

Work can be fun and exciting. By fun we mean a friendly work environment where people like to be. Fun helps us to build deeper relationships and we believe it increases our productivity. It also helps us to balance our work and personal life. Let's have FUN together!



1. Sincerity and Honesty

We are committed to obey the law and regulations and any local requirements in all our divisions and operations. We apply our highly ethical standards in everything what we do.

Based on our values, we respect our co-workers, customers, suppliers, competitors and all our other stakeholders. We do not give any false promises in order to improve our business. We inform our customers of all legal standards and demands related to products, such as logistics instructions and possible sales related restrictions.

2. Respect for Human Rights

We do not discriminate based on color, race, age, sex, nationality, character, political view, religion, sexual orientation, opinions or social status. We do not tolerate physical or mental violence, bullying or any sexual or verbal harassment. We ensure this with the help of our internal Human Resource policies, such as Equality plan, Model of early support an intervention and Alcohol policy.

We do not tolerate child labor, unfair use of status or any discrimination based on irrelevant characteristics of an employee. Every staff member of HL Group is obligated to report concerns or take actions against these matters mentioned above.

We respect our co-worker's different point of views and ways to work and we make this diversity our strength. We also encourage everyone to take actions to improve our work environment.

3. Health and Safety

We follow proper safety instructions and use protective equipment and work wear. Operating proactively, we keep our work environment healthy and safe for each other.

It is our responsibility to ensure that also our stakeholders stay safe when visiting our premises. We also inform our customers about the safe and proper use of our products.

4. Conflict of Interest

The personnel of HL Group do not give or accept gifts, services or hospitality, that may be seen as an attempt to affect business decisions. Only moderate and reasonable gifts or hospitality can be given and received under these tight terms.



5. Corruption and Bribery

We do not tolerate corruption or bribery in any form and try to prevent situations that could lead to that. We do not offer or accept any bribery, such as money, to obtain business – this will not be tolerated in any situation. We do not offer bribes to government officials or stakeholders with the aim of affecting their operations.

6. Confidentiality

We are loyal towards our company and stakeholders and we do not give away any confidential information. By confidential information we mean all the non-public details about our company, stakeholders or employees. We store all the confidential information safely and securely destroy them when needed.

7. Fair competition

HL Group follows competition law and all other laws that regulate competition. We avoid situations, that can be stated illegal constriction of competition. We do not spread out intentionally any misleading or false information of our competitors. We also do not exchange any sensitive information with our competitors that could be against competition law.

8. Responsible procurement

HL Group requires that its suppliers follow the same responsible and ethical principles that we do. This is essential in order to establish partnership and cooperation. We expect our suppliers to promote these principles also to their own suppliers across the supply chain.

9. Environment

We commit to follow the principles of sustainable development and pay attention to environment in all our operations. We select the safest and non-toxic options as possible into our product range. We also develop environment-friendly service concepts that optimizes logistics and warehousing. HL Group monitors and follows legislation concerning chemicals and educates personnel about it. We minimize our environmental footprint by reducing wastage and taking care of recycling and energy efficiency.

10. Reporting concerns

All HL Group employees must know the Code and commit to these standards and principles. Our employees are responsible to report possible concerns to their supervisor or company management.