



CORPORATE SOCIAL RESPONSIBILITY POLICY



POLICY
Corporate Social
Responsibility

POLICY OWNER
CEO

LAST UPDATE
2021-12-10



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2. BACKGROUND AND PURPOSE

To ensure that BHG GROUP AB and its direct and indirect subsidiaries ("BHG Group" or the "Group") comply with applicable laws and regulations and that the Group values and way of working is valid throughout our entire organization, the Group has developed a number of group-wide policies, including this policy.

This policy regulates in a uniform way how the group manages activities related to Corporate Social Responsibility as well as defining roles and responsibilities for the area. This policy is followed by the Code of Conduct, Supplier Code of Conduct and Environmental policy which are all described in further detail and are stakeholder directed.

3. POLICY

3.1 CORPORATE SOCIAL RESPONSIBILITY

Corporate Social Responsibility can be defined in various ways; to us it is a possibility as well as an obligation to act responsibly towards all stakeholders including future generations.

BHG has a strong focus on sustainability from an economic, social and environmental perspective. Human rights, equal opportunities and environmental considerations should always be fulfilled and BHG strives to develop relationships with suppliers that conduct their business in a similar ethical manner following prevailing laws.

Our Corporate Social Responsibility commits us to:

- Comply with the UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption. These principles are based on UN's Universal Declaration of Human Rights and ILO's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration as well as UN's Convention Against Corruption.
- Have sufficient information about laws and regulations in countries where we do business in order to at all-time abide by them.
- Supply terms of business that clearly explain BHG's expectations and ethical standpoints as well as commit suppliers to act in congruence with the UN Global Compact's ten principles.
- Allow employees freedom of association and not tolerate forced labour or child labour.
- Act on the basis of our environmental policy and constantly seek new and better ways to minimise our environmental impact.
- To support fair and honest competition following the laws of countries where we do business.
- Have sufficient information about competitors, customers and suppliers before entering commercial relationships.
- Act fair and honest towards suppliers and subcon- tractors.

- Not engage in any activity which is, or could be perceived to be, corrupt, fraudulent, improper or unlawful.
- Not to offer, pay or accept bribes or substantial favours that could affect the outcome of a business decision.
- Not to participate in party politics or make donations to political party funds or candidates.
- Supply products and services that meet our customers' expectations regarding quality, safety, service and production.
- Guarantee safe and secure handling of personal information provided by customers on all our web platforms.

3.2 EQUAL OPPORTUNITIES, DIVERSITY AND INCLUSION

BHG believes in equal opportunities throughout all aspects of employment. The fundamental principle is equal pay for equal work, regardless of gender. We regard a diverse workforce as valuable for innovation, customer adaptation and competitive edge, both among ourselves and our suppliers. BHG promote equal opportunities irrespective of race, ethnical background, religion, nationality, gender, mental or physical disabilities, marital status, age, sexual orientation or any other status unrelated to the individual's ability to perform his/her job.

BHG promotes equal opportunity to all employees, applicants for employment or promotion, suppliers, customers and members of the public with whom we come into contact. For us this means:

- Actively working to provide a physical and psychosocial work environment suitable for the entire work- force.
- Providing a work environment without any kind of discrimination, special treatments, sexual, physical or mental harassments (including bullying), or any other violating actions.
- Providing equal reward, pay, benefits, work conditions, possibilities and career opportunities for equal achievement, work difficulty and equivalent effort.
- Providing all personnel with access to education and feedback and development opportunities through ongoing performance management.
- Actively working towards a more equally balanced workforce throughout the company in order to leverage the value of diversity and equality for all our stakeholders.
- Provide a safe, clean and secure work environment.
- Everyone working for BHG, in particularly those in a management position, has a responsibility in the daily work to ensure compliance to above commitments.

BHG is attempting to build an organisation which is not dependent on individuals. Such a structure facilitates the opportunity for each employee to balance work and private life, irrespective of status.

3.3 OUR EXPECTATIONS FROM OUR SUPPLIERS

At BHG, we seek to conduct our relationships with our suppliers in a decent and proper way and we seek to develop relationships with suppliers that conduct their business in an ethical manner. BHGs' supplier principles are integrated in our supplier code of conduct and apply to all companies, suppliers and manufacturers that we conduct business with.

- We expect our suppliers to support universal human rights.
- We expect our suppliers and subcontractors to allow employees freedom of association.
- We expect our suppliers to operate employment practices that respect human dignity.
- We expect our suppliers to judge their employees and contractors based upon their ability to do their jobs and not upon their physical and/or personal characteristics or beliefs, affirming the principle of no unlawful discrimination based on race, ethnical background, religion, nationality, gender, mental or physical disabilities, marital status, age, sexual orientation or any other status unrelated to the individual's ability to perform his/her job.
- We expect our suppliers neither to employ anyone under the legal working age nor to condone physical or other unlawful abuse or harassment, or the use of forced or other compulsory labour in any of their operations.
- We expect our suppliers to follow all applicable laws, and similar standards and principles in the countries in which they operate.

3.4 ENVIRONMENT

At BHG we take pride in minimising our environmental impact and carefully consider the environment in all areas of our business.

Our environmental policy commits us to:

- Complying with all relevant environmental legislation, codes of conduct and other regulatory requirements in all countries where we operate.
- Placing responsibility for our environmental performance with our Executive Management and Board members.
- Actively work to reduce our direct environmental impact such as usage of raw materials and energy.
- Work towards having business agreements with environmentally friendly suppliers and producers.
- To reduce our pollution travel only when absolutely necessary and if it is then by train is always the first option.
- Producing quarterly and annual reports available for download online instead of printing and distributing hard copies.
- Helping to reduce the waste problem by using renewable materials and handling waste in a safe and responsible way.
- Recycling and use renewable materials where possible.

- Communicating digitally, through the internet, to minimise our use of paper, print and transport.

3.5 ALCOHOL AND DRUGS

BHG's policy on the use of alcohol and drugs is based on BHG's commitment to assist employees wherever possible, to provide a safe and secure working environment for employees, to produce a quality service, and to protect the integrity of BHG's reputation. It is company policy that employees shall not during working hours or whilst on company business and whether on company premises or no matter when, sell, purchase, possess, supply, consume or use alcohol, controlled or volatile substances.

Exceptions to the rule above may be made for alcohol during special occasions or representations. Special permission can only be granted from either executive management or executive in charge.

3.6 WHISTLE-BLOWER

BHG is committed to ensure that any incident of workplace malpractice is prevented wherever possible, and immediately dealt with, should they arise. Employees are often the first to realise that something is wrong in the workplace, but they may feel that they cannot express their concerns because to do so would be disloyal to their colleagues or to BHG or could result in them being subjected to harassment or victimisation. To prevent this, BHG has an established procedure for handling Whistle-blower-errands via an external software channel to secure anonymity for the whistle-blower.

BHG considers the following matters to constitute malpractice:

- A criminal offence has been committed, is being committed, or is likely to be committed or
- A person has failed, is failing, or is likely to fail to comply with their legal obligations or
- A miscarriage of justice has occurred, is occurring, or is likely to occur or
- An individual has failed, is failing, or is likely to fail to comply with BHG Code of conduct or
- The health and safety of any individual has been, is being, or is likely to be endangered or
- The environment has been, is being or is likely to be damaged or
- There has been any manipulation of financial data or accounting records or
- Any of the above are being, or are likely to be, deliberately concealed.

4. RELEVANT ENTITY

This policy applies to all BHG Companies/entities.



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5. ROLES AND RESPONSABILITIES

The CEO is responsible for this policy. The Board of BHG is the authorised approver of the Corporate Social Responsibility Policy.

6. EXEPTIONS

Any need for exceptions to this policy must be clearly defined and documented. All exceptions shall be

approved by the CEO and communicated to the policy owner who is responsible for reporting to the Board.

7. REFERENCES

- Code of Conduct
- Supplier Code of Conduct
- Environmental Policy