

## H&M Group – Code of Ethics Policy

### Business Partner Commitment Form

<b>Document type:</b>	Policy
<b>Applies to:</b>	Business Partner
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<b>Owner:</b>	H&M Group Security
<b>Contact:</b>	Head of Security Governance of H&M Group Security
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<b>Supersedes:</b>	Version 3.0

## Introduction

This Code of Ethics is mandatory for all business partners having a business relation with H&M Group by supplying goods and/or services, acting on behalf of or having other kind of collaborations with H&M Group such as e.g. suppliers, vendors, consultants, landlords, agents, service providers and organizations (hereafter referred to as business partner)

H & M Hennes & Mauritz GBC AB and all companies included in the Group (hereafter referred to as H&M Group or the Company) value the fact that all the operations of the Company are characterised by honesty, transparency, integrity and fair play. As a business partner to H&M Group, you should read and comprehend the content in H&M Group's Code of Ethics and comply with it in all business with the Company.

All business carried out with or on behalf of H&M Group should always be conducted in accordance with the Company's Code of Ethics and applicable laws and regulations in the country of business.

## Zero tolerance – bribery and corruption

H&M Group has a zero-tolerance policy on bribery and corruption. This applies to all the Company's business and transactions in all the countries in which the Company and its business partners operate. The Company does not tolerate bribery in any form and commits to a strong anti-corruption program, including this Code of Ethics. The Company is determined to ensure that the objectives of this Code of Ethics are fulfilled and will therefore further instruct and educate all concerned employee as well as business partners to secure their knowledge and compliance with the principles in this Code.

Under this Code of Ethics a bribe includes financial or other advantages which are given, promised, offered, accepted, requested or received with the intention to influence the ability to make objective and fair business decisions. As a business partner to H&M Group, you must not carry out any actions involving bribes when you act in connection with H&M Group's business. This includes both domestic and international business and it should be incorporated in all deals, both with private actors and public officials.

**Facilitation payments** are not permitted when acting for or on behalf of H&M Group.

Whether an action constitutes a bribe is determined by the standards set forth herein. Any local practice or custom will thus be disregarded, unless explicitly permitted or required by local written law.

## Advantage – gifts and hospitality

H&M Group does not allow its employees or other representatives to request, accept, arrange, offer or give any kind of advantage in connection with Company's business. In accordance the Company has a strict no gift policy. H&M Group particularly wishes to point out that employee or other representatives of the Company are not allowed to take any commission from H&M Group business partners. Should any of

the Company's employees or representatives openly or implied, ask for a commission or advantage of any kind, you are advised to immediately inform H&M Group.

In the conduct of company business, it is a violation of H&M Group's Code of Ethics if a business partner offers any kind of advantage to an employee of the Company or other H&M Group representatives.

The term 'advantage' may include – but is not limited to – the following: gift, loan, money (regardless of currency), fees, reward, journeys, services, bonuses, lavish meals, vouchers of any kind, product samples for personal use, event tickets, discount on private purchases, sponsoring or any kind of personal favours.

It does not matter whether the person to whom the advantage is offered, promised or given is the same person as the one who is to perform, or has performed, the relevant action. Further it does not matter whether the advantage is given directly or by a third party, the recipient is in breach of this Code regardless of the fact that he or she receives the advantage directly or through a third party or if another person is the genuine beneficiary.

Be aware that H&M Group does not allow the offer or receipt of hospitality whenever such arrangements could affect the outcome of business transactions i.e. the purpose is to obtain or retain business with H&M Group.

## Confidential Information

Confidential information represents trade secrets and other company information not generally known outside H&M Group.

A business partner of H&M Group must never disclose confidential information to any person outside or within your company except to persons to whom disclosure is necessary for the purpose of the contract with H&M Group or required from authorities by law or local regulation.

You must keep confidential information about H&M Group safeguarded in your organisation.

Confidential information includes, but is not limited to; H&M Group's financial or commercial relationships, trade secrets, buying, offers, strategies, all supplier related information, IT solutions, analyses and sensitive personnel data, information concerning H&M Group and/or the business carried on within H&M Group and which is not in the public domain.

Signing this document is a confirmation of your undertaking to not disclose any confidential information.

## Compliance

You should read and comprehend the content in H&M Group's Code of Ethics and commit to comply with the policies and procedures mentioned in the Code.

You have the responsibility to inform all your employees, involved in H&M Group business, about the content in H&M Group's Code of Ethics to secure their compliance.

In addition, you also have the responsibility to inform all related subsidiary and subcontractors about H&M Group's Code of Ethics to secure their awareness and possibility to comply.

A deliberate violation of H&M Group's Code of Ethics may lead to termination of all business connections with the Company.

Since most sections of H&M Group's Code of Ethics follow the law in each country where the Company operates, any deliberate violation of the Code of Ethics may be a criminal act.

If you, your employees, subsidiary, subcontractors or any other representatives of your company have questions concerning the meaning or application of H&M Group's Code of Ethics or have anything related to report, please contact via [www.speakup.hmggroup.com](http://www.speakup.hmggroup.com).

H&M Group is committed to continuously review and update its policies and procedures, therefore this Code of Ethics can be subject to modification. The Company will inform whenever there is any major changes or updates in the Code.

The latest version of this Code is available on [www.hm.com](http://www.hm.com) or the *Supplier Portal*

Please sign the compliance commitment on the last page of this Code of Ethics and return it to the Company, indicating that you have received, read, understood and agreed to comply with H&M Group's Code of Ethics.

If your company has an Anti-Corruption Policy/Code you are welcome to enclose this when you submit the signature page to H&M Group.

For your information, all concerned H&M Group employees sign H&M Group's Code of Ethics and thereby undertake to comply with it.

**H & M HENNES & MAURITZ GBC AB  
CODE OF ETHICS COMMITMENT FORM**

We hereby confirm that we have received, read and understood the content of H&M Group's Code of Ethics.

We commit to comply with H&M Group's Code of Ethics, take the responsibility to inform all our concerned employees about the content in H&M Group's Code of Ethics and to make sure they comply with the Code accordingly.

In addition, we also take the responsibility to inform all related subsidiaries and subcontractors about H&M Group's Code of Ethics to secure their awareness and possibility to comply.

If we, any representative of my company, subsidiary or subcontractors, have questions concerning the meaning or application of H&M Group's Code of Ethics, or have anything to report, we know that we should contact the Company, knowing that our questions or reports to these sources will be maintained in confidence.

Yes, we have an Anti-Corruption Policy/Code and it is enclosed for your reference.

\_\_\_\_\_  
Place and date

\_\_\_\_\_  
Business Partner Company name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name in printed letters

\_\_\_\_\_  
Business Partner Company stamp

**Please sign and submit only this page to H&M Group. Thank you.**