

HMS Group Code of Conduct

Global Management

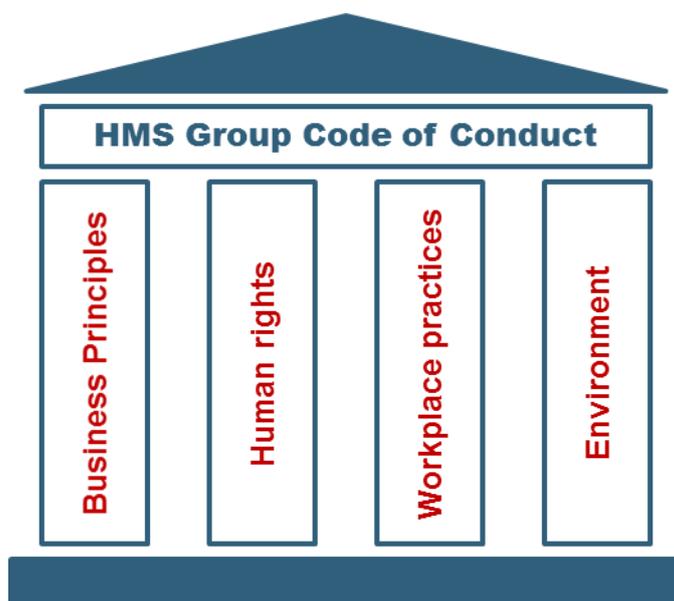
Policy

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Each year, the HMS Group reports on its sustainability related work in accordance with Global Reporting Initiative's guidelines.



Staffan Dahlström
CEO and President

"HMS enjoys an invaluable reputation that has been built on a long and successful growth history. Honesty and fairness have always characterized our way of doing business. The HMS Group Code of Conduct underscores the principles by which the Group aims at building and sustaining long-term relations with all stakeholders. By applying the HMS Group Code of Conduct in our daily work, we ensure that our business is conducted in a responsible and sustainable way.

Thank you for contributing to our commitment to maintain the highest standards of business ethics and integrity in everything we do!"

Applicability of the Code

Together with other Group policies and our core values (Hi5), the HMS Group's Code of Conduct forms the basis for the way we work and conduct business within in the HMS Group.

HMS Group's Code of Conduct adopts the principles of the UN Global Compact, which aims at aligning businesses with human rights, labor, environmental care and anti-corruption principles

All our employees are expected to always act according to and in the spirit of the Code. All managers are accountable for communicating the content of and for enforcing the Code within their respective organizations

HMS group's reputation is a highly valuable asset. Just as any other asset, it needs to be developed and protected. HMS Group's Code of Conduct is aimed to guide us and be a tool to maintain our reputation as a reliable partner for industrial communication. It will help us to conduct our business in a reliable way and remind us that every action count. Failure to comply with the Code can severely damage HMS Group reputation and business and may result in disciplinary action.

HMS Group requires suppliers, subcontractors, consultants, distributors and other business partners to adopt and follow these principles. HMS group also continuously evaluates and selects business partners based on criteria including efficiency quality, delivery, price and reliability as well as their ability to meet with the requirements of the Code.

If you are unsure about how to behave in any specific situation, please do not hesitate to contact your manager or HMS Human Resources for support and advice.

Our Business Principles

HMS group is dedicated to be a responsible employer and a good corporate citizen. HMS group is committed to ensuring that all its business is conducted in a responsible, transparent and trustworthy way.

The HMS Group shall follow the laws and regulations in each country where it operates. The Code sets forth the minimum level of approved behavior, even if it stipulates higher standards than required by local law. In case local law is stricter than the Code, local law shall prevail.

Fairness in all business relations

The HMS Group must, always, stay committed to exercise fairness in all dealings with business partners and stakeholders. The HMS Group has zero tolerance for all forms of corruption or bribery in any form.

Business decisions are based on the best interests of HMS Group, without regard to personal relationships or considerations. Employees must not accept gifts, benefits, reimbursements or entertainment, whether directly or through intermediaries, that could affect, or even appear to affect, the objectivity and professional judgment of the employee.

Likewise, HMS Group shall not offer rewards or benefits, whether directly or through intermediaries, to any business party or stakeholder, which is, or appears to be, in violation of applicable laws.

The HMS Group competes in a manner that is both ethical and fair, without engaging in any inappropriate activities or unfair trade practices.

Accuracy in accounting and reporting

The HMS Group is committed to being fair, accurate and timely in all communication.

All financial transactions made by the HMS Group must be recorded in accordance with generally accepted accounting practices in each jurisdiction. Accounting records must show the nature of all transactions in a correct and non-misleading manner.

Personal financial interest

Employees must never use association with HMS Group for personal gain, and shall avoid engaging in external financial interests that might conflict with the HMS Group's interests. Interests to be avoided include personal or family financial interests in any operation or company that has business relationships with HMS Group.

Political involvement

The HMS Group observes strict neutrality with regard to political parties and candidates. Neither the names nor resources of HMS Group shall be used to promote the interests of political parties or candidates.

Conflict of interest

Employees may not engage themselves, with or without compensation, in activities that might conflict or appear to conflict with HMS Group's interests, without approval from the employee's manager and in accordance with HMS "Grand Parent principle" (i.e. the manager of the manager is consulted before approval).

Dealing with confidential information

Employees often have access to information about HMS Group, and sometimes also to information owned by customers or other third parties, that is not generally available to the public. Such confidential information must not be passed on to any unauthorized natural or legal person, and this includes family members. This obligation continues even after termination of employment.

Employees are not allowed to trade in HMS shares or any other kind of property based on so called insider information, i.e. information accessed through work at HMS Group and which is not made public.

Human rights and Workplace practices

HMS Group shall support and respect the protection of internationally proclaimed human rights and make sure the Group is not complicit in human rights abuses.

Respect for the individual

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

Physical, psychological, sexual or verbal harassment against any colleague or business partner will never be tolerated.

Safety

The necessary conditions for a safe and healthy work environment shall be provided for all HMS Group employees, including appropriate information and training.

The use of a) illegal drugs b) alcohol c) violence during work or effecting work performance or employee safety is not tolerated.

Fair employment conditions

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

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.

Forced or child labor

The HMS Group does not tolerate underage labor in its operations or in the operations of any supplier or other party with whom we cooperate. The minimum employment age is 15 years, or the lawful age for working in the country in question.

We do not allow illegal or forced labor in our operations or in the operations of any parties with whom we cooperate.

The Environment

Environmental care is an HMS Group business value and builds on environmentally sustainable principles

The HMS Group conducts a proactive environmental work with preventive actions. We are committed to protecting the environment and believe that we can make contributions to a more sustainable world. Our commitment involves reducing the environmental impact of our operations, products and processes.

All HMS Group employees shall comply with environmental laws and regulations and support the achievement of the Group's sustainability objectives. For us, it means that we take the time to understand the environmental risks and impacts associated with the daily work and looks for opportunities to reduce them. This includes the production of waste and greenhouse gas emissions, as well as the consumption of energy, water, materials and other resources. We follow the requirements and procedures for using, storing, labeling, transporting and disposing of chemicals and hazardous materials.

Internal reporting of Violations

It is important that employees act when deviations occur from the principles of HMS Code of Conduct.

A key point in HMS Code of Conduct is therefore the "Whistleblower" function, i.e. the opportunity for all employees to anonymously report abuse, misuse, irregularities etc. done by person in key position or leading position when issues are conflicting to Code of Conduct.

When reporting issues conflicting to the code of conduct, done by someone in key position or leading position, the report will be handled confidentially and there is to be no negative consequences for a person who reports in good faith.

How to report

Send an e-mail with the information to the chairman of the board.

To be anonymous

You open an e-mail account i.e. yahoo-mail or Gmail etc. and create an account that cannot be linked to you, and send your information, via that account. You can of course stay anonymous if you wish but it will facilitate further investigation if you are willing to supply your name and contact details to the Chairman of the Board.

All issues reported will be investigated.

E-mail address to the Chairman of the board

Charlotte Brogren; charlotte.j.brogren@gmail.com

References

HMS consulted the following references in preparing this Code of Conduct:

- ILO Code of Practice in Safety and Health
- ILO International Labor Standards
- OECD Guidelines for Multinational Enterprises
- OHSAS 18001
- United Nations convention against Corruption
- United Nations Global Compact
- United Nations Universal Declaration of Human Rights