



Husqvarna
Group

Acting With Integrity

Code of Conduct





A Commitment From Top Management

Building Our Future on a Foundation of Integrity

The Husqvarna Group enjoys an invaluable reputation that has been built on a long and successful history. Honesty and fairness have always characterized our way of doing business and the highest standards of integrity are expected of every employee in every country where we do business. Our reputation and our integrity are our most important currencies. When we create and foster a culture of compliance it creates value. Compliance is an investment in our future.

The Husqvarna Group's Key Behaviors states, *It starts with me. What can I do?* Therefore, it is important that we define how each of us should conduct ourselves as global representatives of the Husqvarna Group. Our success goes hand-in-hand with our reputation. All of us need to protect that reputation and take the time to understand how the Code of Conduct applies to each and every one of us.

Everyone who works for the Husqvarna Group should be proud of our business and of our achievements for our customers and the communities of which we are a part. Knowing our Group Policies, applying good judgement, being honest and speaking up are ways we can continue *Acting With Integrity* and build a winning culture.

Our Top Management (as pictured above) fully endorses the culture of our company as defined in the Code of Conduct. Take the time to read and understand our Code of Conduct. Do not hesitate to seek help and guidance if you have any questions or concerns. Most importantly, do not hesitate to report violations and remember that we will not tolerate retaliation against anyone for reporting in good faith.



Contents

INTRODUCTION

- 4 What is the purpose of the code?
- 4 Who should follow the code?
- 6 Be the voice of integrity

WE CONDUCT OUR BUSINESS FAIRLY AND HONESTLY

- 8 Competition principles
- 10 Anti-bribery & gift giving
- 12 Avoid conflicts of interest
- 12 Cooperating with government investigations
- 14 Political involvement
- 14 Donations and sponsoring
- 14 Insider trading
- 16 International trade compliance
- 16 Anti-money laundering
- 16 We only work with reputable business partners

WE CAREFULLY MANAGE OUR COMPANY ASSETS

- 18 We keep accurate records and reports
- 18 Records management
- 18 Data privacy
- 20 Protecting information assets
- 22 Security routines and incident management
- 22 Intellectual property
- 24 Communication and social media

HUMAN RIGHTS AND SAFE WORKPLACE PRACTICES

Our Responsibility in the Workplace

- 26 Embracing inclusion and diversity
- 26 Fair employment conditions
- 26 No forced or child labor
- 28 Health & safety in the workplace
- 28 Freedom of association
- 28 Anti-harassment

END-USER SAFETY

Safety and Quality is Essential

- 30 Safety and quality

REDUCING OUR ENVIRONMENTAL FOOTPRINT

Sustainability is Critical

- 32 Sustainability

-
- 34 Reporting suspected violations
 - 34 Our commitment to preventing retaliation
 - 34 What happens when I report?
 - 35 Other policies
 - 35 Checklist

What is the Purpose of the Code?

Integrity is fundamental to the Husqvarna Group. The principles we work by are deeply connected to our everyday job: 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* is essential. By *Acting With Integrity* and staying consistent to our Code of Conduct, we reflect the values of the Husqvarna Group in all the countries we operate in.

The purpose of the Husqvarna Group Code of Conduct *Acting With Integrity* 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 Husqvarna Group Code of Conduct forms the foundation for the way we work and applies to all employees, officers and directors together with our business partners.

All employees are expected to act in accordance with the Code of Conduct, 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 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. The Husqvarna Group also requires our business partners, e.g., our suppliers, dealers, subcontractors and consultants to

adopt and follow the principles embodied within the Code. The Husqvarna Group also continuously evaluates and selects business partners on the basis of their ability to comply with the requirements of the Code.

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



The 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. (The 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

The Husqvarna Group is committed to conducting its business with the highest degree of integrity. This requires not only that every employee know and follow 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 integrity, not just with words, but by acting with integrity. 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 employees understand that business results are never more important than ethical conduct and compliance with the Code of Conduct and Group Policies.

Speak Up and Ask Questions

If you experience or witness questionable behavior that doesn't seem right to you, then it probably isn't. Speak up if you are comfortable by addressing the individual directly. 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.



Who should I talk to if I have questions?

You can seek help from any of the following:

Your manager or supervisor
A member of Human Resources
Compliance or Legal Affairs
(compliance@husqvarnagroup.com)

Reporting Suspected Violations

If you are not comfortable or unsuccessful directly addressing individual conduct or the matter involves serious misconduct or fraudulent behavior, then you have a responsibility and must report your concerns.

See Page 34 for additional information on reporting suspected violations



We Conduct Our Business Fairly and Honestly

8 Competition Principles

10 Anti-Bribery & Gift Giving

12 Avoid Conflicts of Interest

12 Cooperating with Government Investigations

14 Political Involvement

14 Donations and Sponsoring

14 Insider Trading

16 International Trade Compliance

16 Anti-Money Laundering

16 We Only Work With Reputable

Business Partners



The Husqvarna Group shall follow the laws and regulations in each country where it operates. The Code sets forth the minimal level of approved behavior but local laws may require a higher standard.

Competition Principles

The Husqvarna Group competes 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.

What this means to you



- 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 contacts of any kind with competitors which could create the appearance of an improper agreement or understanding.

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 issues and inform your manager and Legal Affairs of the conversation.

Example 2

One of the Husqvarna Group dealers offers to share a competitor's price list by using their log-in information to enter the competitor's intranet.

You can collect information about a competitor from all public sources such as websites, brochures and annual reports. Remember, however, that you or anyone on your behalf cannot 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 mutual raw material suppliers.

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.

We Conduct Our Business Fairly and Honestly

8	Competition Principles	14	Insider Trading
10	Anti-Bribery & Gift Giving	16	International Trade Compliance
12	Avoid Conflicts of Interest	16	Anti-Money Laundering
12	Cooperating with Government Investigations	16	We Only Work With Reputable Business Partners
14	Political Involvement		
14	Donations and Sponsoring		

Anti-Bribery and Gift Giving

The Husqvarna Group does not tolerate corruption or bribery in any form. It is strictly prohibited in all business dealings, in every country around the world, in both the private and government sectors.

You should not offer any gift to a government official without first consulting with Legal Affairs. You should not offer a gift or anything of value, whether directly or through a third party, to any customer or business partner in order 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 and you must always obtain approval from your manager.

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 are of the opinion that the offer does not affect business relationships, you should avoid accepting such offers. You may accept the offer to join the supplier if you pay for your own meal and ticket to the sporting event.

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 in order 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 the payment may be considered a bribe and you should decline to use the agent to perform the services.

What this means to you



- You have a responsibility to understand the company's Gifts and Hospitality Policy ([link](#)).
- You should never offer, promise, or authorize a payment or the giving of anything of value to anyone in order to obtain an improper business advantage.
- When using third parties such as distributors or agents, you must require that they conduct business at 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) to your manager or HR. Remember that transparency is essential.

We Conduct Our Business Fairly and Honestly

8	Competition Principles	14	Insider Trading
10	Anti-Bribery & Gift Giving	16	International Trade Compliance
12	Avoid Conflicts of Interest	16	Anti-Money Laundering
12	Cooperating with Government Investigations	16	We Only Work With Reputable Business Partners
14	Political Involvement		
14	Donations and Sponsoring		



Avoid Conflicts of Interest

You should never use your employment with the Husqvarna Group for personal gain, and you should avoid engaging in external financial interests that might conflict with the Husqvarna Group's interests.

Avoid personal or family financial interests in any operation or company that has business relationships with the Husqvarna Group. It is critical that any such relationship be disclosed in advance to determine if it is appropriate.

You should not engage, with or without compensation, in activities that might conflict, or appear to conflict, with the Husqvarna Group's interests.

Example 1

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

You should immediately report the situation to your manager and determine whether a conflict of interest can be avoided 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 to determine if a conflict of interest exists. Conflict of interest "clearances" should be resolved by following the company's Conflicts of Interest Policy.

Cooperating with Government Investigations

As enforcement activities increase around the world, the chance increases that a government inquiry or investigation could take place in any country in which the Husqvarna Group conducts business. A government agency may launch an informal investigation seeking information about industry practices or a formal investigation into our company.

Government agencies may contact our company in a variety of ways to include: telephone, email, a letter or even a subpoena or summons.

What this means to you



- 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 any potential or actual conflict of interest.
- You should obtain prior approval from your manager's manager ("grandparent") and HR before hiring, promoting or directly supervising a family member or close friend.
- You should disclose financial interests you (or a family member) may have in a company where you could personally affect the Husqvarna Group's business with that company.

What this means to you



- Immediately report any subpoena, summons, complaint or other legal process to Legal Affairs.
- Comply with all notices that require the retention and preservation of relevant documents and information.
- **Do not** answer any questions (beyond routine inquiries) or provide any documents or information without consulting with Legal Affairs.

We Conduct Our Business Fairly and Honestly

8	Competition Principles	14	Insider Trading
10	Anti-Bribery & Gift Giving	16	International Trade Compliance
12	Avoid Conflicts of Interest	16	Anti-Money Laundering
12	Cooperating with Government Investigations	16	We Only Work With Reputable Business Partners
14	Political Involvement		
14	Donations and Sponsoring		

Political Involvement

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

We do not make any contribution 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.

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 shares on information which 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 the Husqvarna Group intends to announce soon that it is buying another company. You have a friend who is currently considering selling his Husqvarna AB shares. Since the price of the shares will likely rise after the announcement, 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 this means to you



- Any political activities in which you engage are not done on behalf of the 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 authority to do so.

What this means to you



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

What this means to you



- You have a responsibility to understand the company's Insider Policy ([link](#)).
- Your knowledge of the Husqvarna Group 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.

We Conduct Our Business Fairly and Honestly

8	Competition Principles	14	Insider Trading
10	Anti-Bribery & Gift Giving	16	International Trade Compliance
12	Avoid Conflicts of Interest	16	Anti-Money Laundering
12	Cooperating with Government Investigations	16	We Only Work With Reputable Business Partners
14	Political Involvement		
14	Donations and Sponsoring		



International Trade Compliance

The Husqvarna Group complies with all Trade Compliance regulations, laws and requirements that regulate the transfer of goods and technology.

All transactions, regardless of if they are crossing borders or transferred within the same country, may be subject to national and international customs, import or export control regulations and processes which 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 can be used for military or weapons purposes. Some countries also control the release of technical data to foreign nationals within their borders.

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

Anti-Money Laundering

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

Terrorism financing occurs when funds are made available to commit criminal acts of terrorism or to support terrorist organizations. Liability for money laundering does not generally require that the person involved is aware of the source of the funds.

We Only Work With Reputable Business Partners

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

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

We also conduct third party due diligence audits to ensure that any potential business partner has a record of engaging in ethical business practices and afterwards, continues to act consistently with our Supplier Code of Business Ethics.

What this means to you



- You have a responsibility to understand the company's Trade Compliance practices.
- You should be aware that there are persons and countries for which the Husqvarna Group is prohibited in trading. Please review the company's Sanctions Process.

What this means to you



- You should collect and understand documents from prospective customers and business partners to ensure that they are involved in legitimate business activities and their funds originate from legitimate sources.

What this means to you



- Understand the requirements of our Supplier Code of Business Ethics and ensure that it is a part of the contractual agreement with our business partners.
- Always report issues and concerns related to business partner relationships. Be the voice of integrity and speak with your manager or Legal Affairs 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

18	Reliable Financial Reporting	22	Security Routines and Incident Management
18	Records Management	22	Intellectual Property
20	Protecting Information Assets	24	Communication and Social Media

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

Reliable Financial Reporting

All entities within the Husqvarna Group shall apply uniform accounting principles in order 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.

Records Management

All employees are responsible and accountable for the information in their possession and the records they control. The Husqvarna Group has adopted a Record Retention and Management Policy ("Record Policy") which addresses the retention, use and disposal of company records in accordance with 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 Record Policy establishes:

- A set of standardized record "categories" for Records.
- Each category of Record has a defined "retention period" which is described in regionally specific Record Schedules that establishes how long a Record must be retained before it is destroyed.

Data Privacy

The Husqvarna Group takes privacy rights seriously and is committed to international compliance with data privacy laws. It is imperative that we only collect, store and use data that identifies an individual person, whether an employee, a customer or otherwise, in a lawful and transparent manner.

The Husqvarna Group has developed policies and procedures that must be consistently applied when processing personal data within the Husqvarna Group.

What this means to you



- You have a responsibility to understand the company's Financial [\(link\)](#) and Accounting Policies [\(link\)](#) and the Husqvarna Accounting Manual [\(link\)](#).
- In order 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 if you suspect any fraud or inaccuracies in the accounting records or data systems.

What this means to you



- You have a responsibility to understand the company's Record Retention & Management Policy [\(link\)](#).
- You are personally responsible to actively manage 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 this means to you



- 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.

We Carefully Manage Our Company Assets

- 18 Reliable Financial Reporting
- 18 Records Management
- 18 Data Privacy
- 20 **Protecting Information Assets**

- 22 Security Routines and Incident Management
- 22 Intellectual Property
- 24 Communication and Social Media

Protecting Information Assets

In order to remain a market leader and continue to deliver innovative technology, the Husqvarna Group seeks to protect its networks, systems, devices and information assets.

We have the duty to keep our critical business information confidential, accurate and available.

Information assets may exist as digital information or as paper documents and includes:

- 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 the Husqvarna Group information, or to information entrusted to the 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 back pack and laptop are stolen.

You should never keep your password in writing and stored with your computer. Avoid bringing sensitive hard copy documents with you while traveling. Immediately report the loss of any device to the IT Service Desk and your manager.

What this means to you



- You have a responsibility to understand the Information Security Policy ([link](#)) and the Information Classification and Protection Instruction.
- You have an obligation to prevent unauthorized or accidental access, loss, disclosure or destruction of the Husqvarna Group and confidential third party information. This requires you to:
 - NEVER share credentials 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 in an appropriate manner.
- You should not share information unless there is a legitimate business purpose to do so. Where a third-party needs to receive proprietary information, there must be a confidentiality agreement in place prior to sharing the information.
- You have an obligation to 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.

We Carefully Manage Our Company Assets

- 18 Reliable Financial Reporting
- 18 Records Management
- 18 Data Privacy
- 20 Protecting Information Assets

- 22 Security Routines and Incident Management
- 22 Intellectual Property
- 24 Communication and Social Media



Security Routines and Incident Management

The Husqvarna Group is committed to ensure the security of our people and operations globally.

Our security routines, emergency planning and crisis management plans includes processes for identifying and protecting against the risks posed by man-made, serious incidents or natural hazards that effect our employees, operations, facilities or products and services.

What this means to you



- You have a responsibility to understand the company's Security and Loss Prevention Policy and the 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 have the knowledge to remain safe at work, home and on the road.
- Comply with the Husqvarna Group travel policies. You should make use of the company's Travel System when planning travel.

Intellectual Property

Intellectual property refers to creations of the mind, including, for example, inventions, know-how, industrial designs, artistic works, and brands. The Husqvarna Group uses a variety of tools to protect its IP, some of which create enforceable legal rights. Examples include patents, design registrations, trademark registrations, copyright registrations, and trade secrets.

The 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, the Husqvarna Group expects its 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 this means to you



- You must safeguard the 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 the Husqvarna Group's IP rights and seek guidance, as appropriate, from the IP Department on IP-related matters.

We Carefully Manage Our Company Assets

- 18 Reliable Financial Reporting
- 18 Records Management
- 18 Data Privacy
- 20 Protecting Information Assets

- 22 Security Routines and Incident Management
- 22 Intellectual Property
- 24 **Communication and Social Media**



Communication and Social Media

We are all an important part of the 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 the 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 are 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 ([link](#)).

Additionally, all employees using company owned electronic communication are subject to the company's Electronic Communication Policy ([link](#)). The 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 information that you share about our company may be viewed as an official message from the 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 of Conduct when posting information including:

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

What this means to you



- 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 the Husqvarna Group.
- Do not use company letter head or logos on personal communications, letters or posts.
- If you see something online that could be potentially harmful to the Husqvarna Group, report it immediately to your manager or Group Corporate Communications. Don't respond to negative comments yourself.

Human Rights and Safe Workplace

Our Responsibility In the Workplace

- 26 Embracing Inclusion and Diversity
- 26 Fair Employment Conditions
- 26 No Forced or Child Labor

- 28 Health and Safety
- 28 Freedom of Association
- 28 Anti-Harassment

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

Embracing Inclusion and Diversity

The Husqvarna Group strives to attract, develop and retain a workforce that is as diverse as the markets we serve and to ensure an inclusive work environment that embraces the strength of our differences. Diversity makes us stronger and better and companies with a more diverse work force also perform better financially.

The Husqvarna Group provides 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.

Fair Employment Conditions

Employment terms and wages shall be fair and reasonable. The Husqvarna Group complies 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

The Husqvarna Group does not tolerate child 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, involuntary, bonded or forced labor, human trafficking or any forms of slavery in our operations or in 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.

What this means to you



- 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.

What this means to you



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

What this means to you



- 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.

Human Rights and Safe Workplace

Our Responsibility In the Workplace

- 26 Embracing Inclusion and Diversity
- 26 Fair Employment Conditions
- 26 No Forced or Child Labor
- 28 Health and Safety
- 28 Freedom of Association
- 28 Anti-Harassment

Health and Safety in the Workplace

The necessary conditions for a safe and healthy work environment shall be provided for all Husqvarna Group employees, including appropriate safety information and training. Our goal is to have zero work place accidents and injuries.

The use of illegal drugs at 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

The Husqvarna Group seeks to provide a work environment that is free from harassment of any kind and/or any other offensive or disrespectful conduct.

Physical, psychological, sexual or verbal harassment against any colleague or business partner will never be tolerated and will be subject to disciplinary actions.

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 not hesitate to go to her manager or HR to report the matter. Mark's unwanted attention is creating a work environment that is uncomfortable for Brenda and his behavior should stop immediately. The Husqvarna Group is committed to creating a respectful and secure work environment.

What this means to you



- 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 this means to you



- You have the right to appoint worker representatives and form worker's associations or join trade unions of your own choosing.
- Your decision whether or not 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 this means to you



- Avoiding harassment means avoiding such conduct as:
 - 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
- If you experience or witness harassing behavior of any kind, then be the voice of integrity and speak up and/or report it immediately.

End-User Safety

Safety and Quality is Essential

The 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 idea to product delivery, operation, maintenance and disposal across all of our operations.

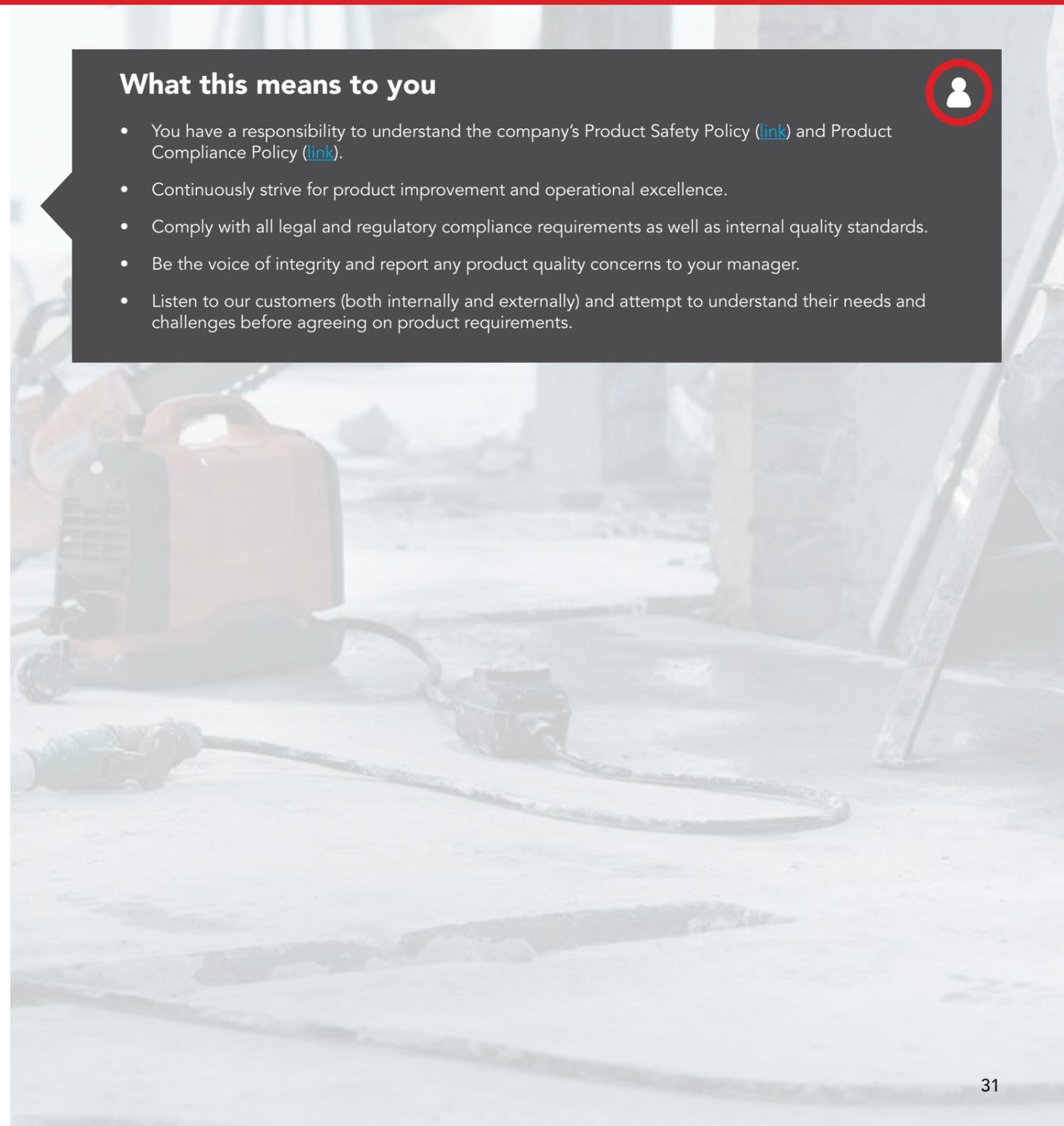
We maintain consumer trust by manufacturing superior products, starting with the purchase of our raw materials and continuing until the finished product reaches the end-users' hands. We are also committed to developing new products in an ethical and responsible manner, and to following all applicable safety and compliance standards in the relevant markets.

The Husqvarna Group employs transparent and effective procedures for addressing customer inquiries and complaints and strives for fair and timely resolution of all customer disputes.

What this means to you



- You have a responsibility to understand the company's Product Safety Policy ([link](#)) and Product Compliance Policy ([link](#)).
- Continuously strive for product improvement and operational excellence.
- Comply with all legal and regulatory compliance requirements as well as internal quality standards.
- 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.



Reducing Our Environmental Footprint

Sustainability is Critical

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 the Husqvarna Group, the term "sustainability" means that, in addition to generating value for our shareholders (profit), we have a duty to take into account the impact of our business on the environment (the planet) and society as a whole (people). We are convinced that consistently acting in a sustainable manner – 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, the Husqvarna Group is committed to reducing our overall impact on the environment, especially in terms of green-house 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.

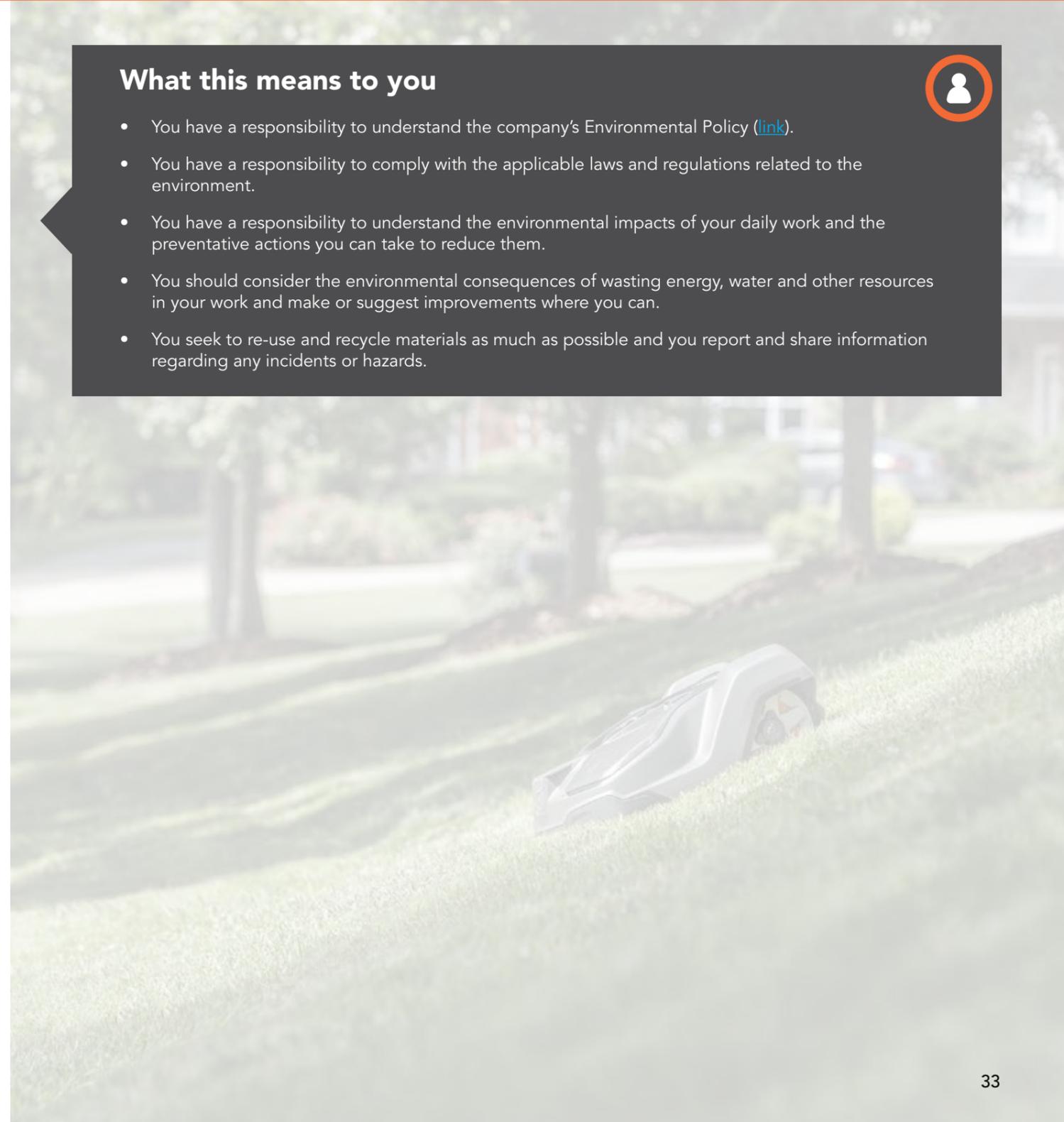
More generally, we ensure that we manage natural resources carefully and consistently to reduce the environmental impact and to comply with environmental laws and regulations in support of the Group's sustainability objectives.

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 this means to you



- 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 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, and must report your concerns. By reporting misconduct, you are contributing to the ethical culture of the Husqvarna Group.

For this reason, various channels are available to facilitate seeking advice and reporting concerns. If you wish to make a complaint or report a suspected violation, you are encouraged to contact your manager or a local member of Human Resources or Legal Affairs.

If you find it difficult to raise an issue locally, the Husqvarna Group Compliance & Integrity Office can be contacted at compliance@husqvarnagroup.com, or by separate email to the Group General Counsel or VP Compliance & Integrity.

You can also contact the Husqvarna Group AlertLine on-line at: husqvarnagroup.ethicspoint.com or using the telephone numbers on Connect ([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.

Our Commitment to Preventing Retaliation

Ethical values and integrity are of greatest importance to the 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.

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 confidential and we will only disclose information necessary to conduct an investigation. However, in some cases involving serious matters of

potential 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 taken into account in determining the appropriate course of action.

Our Group Policies

Additional related Policies and detailed information can be found through the Husqvarna Group Intranet "How We Work" site and includes such topics as:



Checklist

Consider the following in making decisions in your day to day activities:

- Is my action or failure to act lawful?
- Is my action or failure to act consistent with the Husqvarna Group Code of Conduct and the spirit of the Code?
- How would I feel if the course of action I am considering were reported on the front page of the local newspaper?
- Would I feel comfortable if I had to explain my actions to a colleague, to my manager or my family?
- What are the possible consequences of my action or failure to act?
- Will my action or failure to act protect the Husqvarna Group's reputation as a company that strives to maintain the highest business integrity?

Head office Husqvarna AB (publ) | Mailing address: Box 7454, SE-103 92 Stockholm, Sweden
Visiting address: Regeringsgatan 28 | Telephone: +46 8 738 90 00 | www.husqvarnagroup.com
Registered office Husqvarna AB (publ) Jönköping | Mailing address: SE-561 82 Huskvarna, Sweden
Visiting address: Drottninggatan 2 | Telephone: +46 36 14 65 00

