

A CATALYST FOR CHANGE IN THE NICOTINE INDUSTRY

HAYPP GROUP

Sustainability Report 2021

Haypp Group Sustainability Report 2021

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About the sustainability report

This report pertains to Haypp Group AB, corporate identity no. 559075-6796, and its subsidiaries*. Haypp Group reports its sustainability work based on our materiality assessment. These sustainability aspects follow the Global Reporting Initiatives standard, GRI Core, and have been assessed as material in relation to the company's business and stakeholders' expectations. Full guidelines for GRI Universal Standards (GRI 1, GRI 2 and GRI 3) are intended to be used for reporting after January 2023 as the basis for Haypp Group's next sustainability report.

In accordance with Chapter 6, Section 11 of the Swedish Act of Annual Reporting, Haypp Group has chosen to issue the statutory sustainability report as separate from the annual report. Haypp Group reports on its sustainability work annually and the relevant period for this report is the financial year from January 1, 2021 to December 31, 2021. This is the second time a sustainability report is made for Haypp Group, however, it is the first time as a listed company.

The Board of Directors of Haypp Group is responsible for this sustainability report and comments relating to the sustainability report may be sent to sustainability@hayppgroup.com.

*Haypp Group AB is the parent company in a group with the wholly owned companies Haypp AB (559174-2738), Snusbolaget Norden AB (556801-3683) and Northerner Scandinavia AB (556559-1699), all based in Stockholm. Further, Haypp Group AB is the parent company of the wholly owned company Snushjem.no AS with its registered office in Norway. Northerner Scandinavia AB in turn owns Northerner Scandinavia Inc. and SLF Innovation ApS.



About Haypp Group

Haypp Group is a consumer driven e-commerce group focusing on oral nicotine products. Our purpose is to reduce tobacco-related deaths globally, whilst promoting healthier enjoyment for millions. We achieve this through supporting the development of quality products, selling the best and most attractive products and brands, and maintaining strict control. We must also ensure that only people of legal age can purchase our products. At the same time, we must offer the most sustainable and attractive products to our customers, and a consumer-oriented customer service.



Haypp Group has the ability to generate real change in the industry, the global transformation from smoking to healthier alternatives. Haypp Group has its origins in Scandinavia with extensive experience from pioneering markets in smoke free alternatives and being a leader in the e-commerce sector. In 2021, Haypp Group extended the numbers of e-commerce platforms through acquisition, hence today operating a total of ten platforms. The online presence is strong within Scandinavia and selected European markets, as well as in the United States.

The tobacco supply chain starts with the harvesting of tobacco leaves as an input either to the snus products or from which nicotine is extracted in order to produce nicotine pouches and ends with the sale of the finished products to consumers. Our main suppliers are tobacco and nicotine pouch manufacturers. As a consumer-facing organisation, Haypp Group also has suppliers that provide services related to delivery and logistics as well as IT hardware and software. Haypp Group works in collaboration with the brand owners, both larger international companies and smaller Swedish

start-ups producing and developing nicotine pouches. Haypp Group is an active driving force in the industry's development and change towards healthier products. This is achieved through anchoring the ideas and values with the consumers.

In 2021, Haypp Group continued its planned investments and changes in its warehouse infrastructure. After in 2020 changing one of its warehouses in the United States, as well as establishing a Swedish warehouse, Haypp Group established its own warehouse in Norway at the end of 2021. Additional infrastructural changes with more warehouse capabilities over Europe and in the United States are processing as planned.

As Haypp Group makes new nicotine pouch products available to customers for purchase, such products are tested to make sure that they comply with all applicable legal requirements. Haypp Group has further initiated product and laboratory testing for products which are not yet regulated to ensure that the products are safe to use and thereby creating an industry standard.

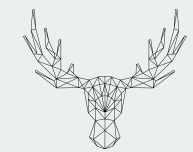


HAYPP



snus.com

Snuslageret



NORTHERNER



SNUSNETTO

Highlights 2021

The year of 2021 continued with its challenges related to the corona pandemic. As restrictions came and went, the pandemic served as a catalyst for the development of e-commerce. However, the developmental changes were not the same as those in the initial phases of the pandemic.



Health contribution

 **117,965**
lives were saved

 **2,382,812**
years which will be lived

As consumers in 2021 choose a significantly less harmful alternative for their nicotine enjoyment.

 **100 %**

Supplier Code of Conduct

100% of our nicotine product suppliers have signed our Supplier Code of Conduct or have developed similar codes of conduct and processes.

 **-40 %**

New Norwegian warehouse

During 2021, operations in Norway moved from third-party logistics to our own new warehouse with custom-ordered machinery. Initial results show a reduction of almost 40 % in material cost as we moved from mainly bubble wrap packaging to cold-sealed cardboard.

Organisation



At times it has been a challenge to expand to a third of our size and continue to manage the organisation. A challenge is, however, an opportunity to develop, and one of our highest priorities in the coming years will be to integrate all new employees and build the culture of the organisation. The cultural values of Haypp Group will serve as a guide.



No. 1

Acquisition of platforms

Acquisition of assets in Nettotobak and Snusnetto were carried out on 30 June and 1 July respectively. The acquisition confirms Haypp Group's position as the Swedish market leader in oral nicotine.



+32 %

Orders shipped

The amount of orders shipped each day rose by +32% from about 7,000 orders to over 9,250 orders per day in 2021.

Enlightening the public



+1,200,000

Over 1,2 million visits to editorial sites which covers everything from market developments and scientific to fun facts.



+2,700,000

Invested over 2,7 million SEK in product testing and marketing standard of nicotine pouches.

At Haypp Group we believe that knowledgeable and enlightened people will always choose safe nicotine.

Haypp Group multi-year financial overview

Amount i thousand SEK	2021	2020	2019	2018
Net sales	2,266,765	1,729,171	802,431	460,149
EBITA	35,768	30,054	-1,285	5,018
Disturbing comparison items	35,237	30,500	5,689	1,543
Adjusted EBITDA	71,005	60,554	4,404	6,562
Adjusted EBITDA margin, %	3,1	3,5	0,5	1,4
Operating profit	-22,622	-14,331	-24,453	-11,476
Balance sheet total	925,993	549,619	491,889	263,475

Haypp Group's net sales increased by 31 percent.

Financial management

Haypp Group’s head office and main operations are based in Stockholm. With the exception of snus, which is only available in Sweden, we operate and serve customers around the globe. Besides Sweden, where the majority of our personnel are located, we have additional staff in Norway, the United Kingdom, Spain, Germany, Hungary, Croatia and the United States. From October 2021, Haypp Group has been Nasdaq First North Growth Market listed company. Among its owners, the original founders, management and employees are all found. As well as larger private and institutional investors. All senior managers have been hired from the local community.

The highest governance body of Haypp Group is the Board of Directors, consisting of six members. The Board of Directors oversees the Management team, composed of eleven members, in charge of the daily operations including decision-making in relation to economic, environmental and social topics. Members of the Board of Directors are proposed by the Nomination Committee whose task is to propose an appropriate composition and mix, including age, gender, education and professional background. The diversity should be manifested by the elected members of the Board of Directors’ versatility and breadth regarding the competences, experiences and background.



Ingrid Jonasson, chairman of the Board of Directors

Ingrid Jonasson is the chairman of the Board of Directors. The CEO of Haypp Group is Gavin O’Dowd. The corporate governance structure is set up with different managers which report to the CEO. Please refer to the Annual Report for Haypp Group AB for financial information on e.g. turnover and growth and the entities included in the consolidated financial statements. During 2021, Haypp Group had 131 employees in addition to full-time consultants. The material topics prioritised for the report can be found in the Materiality analysis.



Gavin O’Dowd, CEO

THE 10 LARGEST SHAREHOLDERS PER DEC 31, 2021

GR8 Ventures AB, Patrik Rees, Fidelity Investments (FMR), Northerner Holding AB, Rutger Arnhult, Gavin O’Dowd, e-Business Partner Norden AB, Ola Svensson, Pulsen Sb Investment AB, Erik Selin.

Governance and sustainability



The overall responsibility for performance within sustainability lies with the Board of Directors. They determine the strategy for Haypp Group, and identify the risks based on recommendations from the management team. The Board of Directors are tasked with monitoring the risk management process, and are continuously informed about existing and recently-identified risks, as well as measures taken to limit risks. All functions are responsible for managing the risks associated with their plans, both centrally, as well as by individual staff members. The Code of Conduct helps to ensure a corporate culture that prevents unnecessary and avoidable risk-taking.

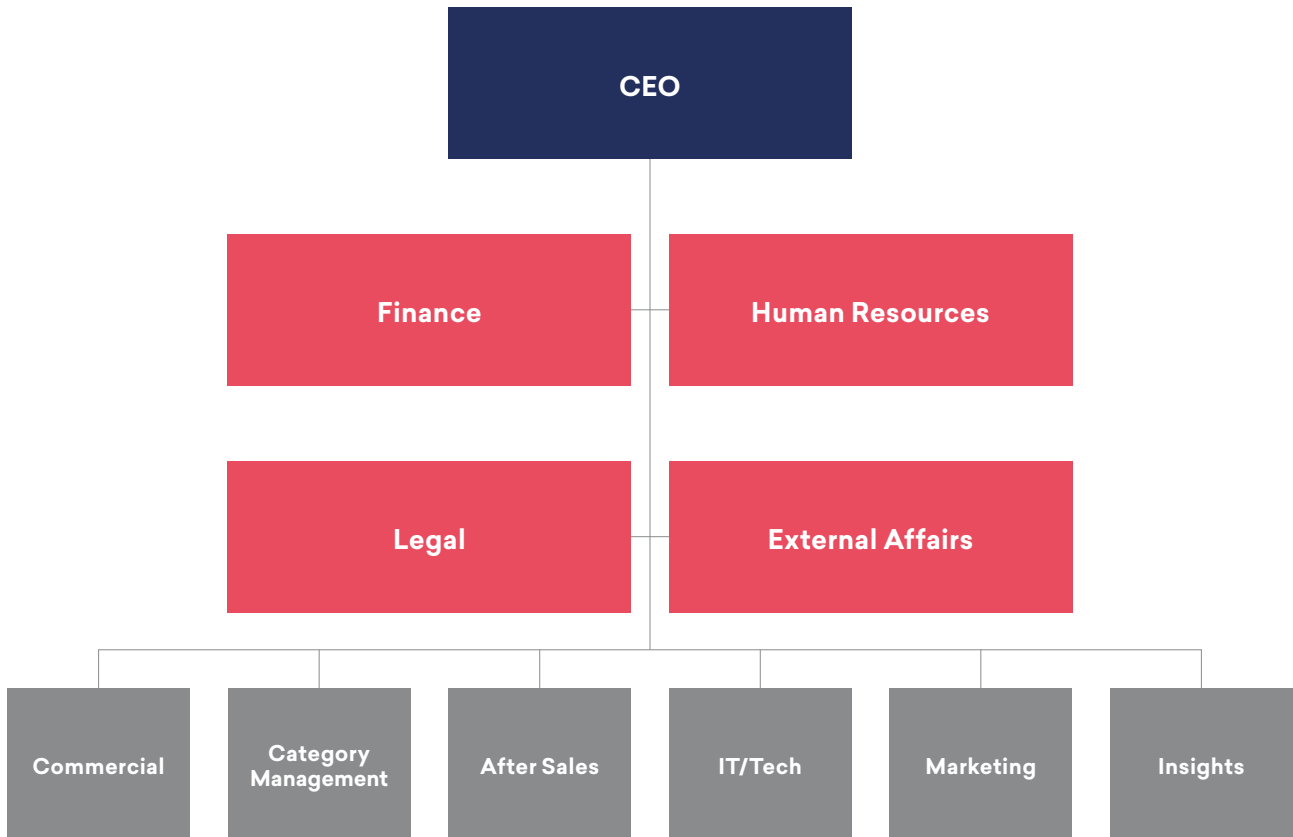
All employees are requested to identify and report events and circumstances that include risks. Existing and potential risks are discussed on an ongoing basis within the management team. To ensure that the responsibility is clearly communicated and understood, as well as the management team having the right tools for working with risk management, a policy has been developed and adopted in 2021, followed by internal dialogues and e-learning. As part of the onboarding process, when joining Haypp Group, the Code of Conduct is not only reviewed but also something each employee is actively asked to acknowledge.

Each year, a risk assessment is made identifying significant risks that Haypp Group is exposed to. The identified risks, including probability and potential impact, connection with other risks, preventative activities and monitoring, are presented to the management team which in turn presents the risks to the Board of Directors. This process ensures that appropriate measures are taken to reduce, prevent and counteract unwanted risks.

Based on the outcome of the annual risk assessment process, strategies are developed to manage new and/or changed risks. Decisions about risk management may include that risks must be avoided, reduced, shared or accepted.

We govern sustainability the same way we govern everything else that is critical to the business. The evaluation of our impact on sustainability is a part of our ordinary business review presented to management, and handled accordingly. Sustainability risks are addressed with the same priority as financial or operational risks. The coordination responsibility for assessing sustainability risks works the same way as the annual risk assessment process. This ensures that ESG risks are managed in the same manner as other significant risks identified by the organisation.

Haypp Group has during 2021 also appointed a sustainability manager who is given relevant training in sustainability matters, especially those more common for e-commerce businesses.



Organisation

Out of a total of 131 full-time employees in 2021, all but three were employed by permanent contract. Four employees were employed on part-time contracts. In addition, Haypp Group has 15 individuals contracted as full-time consultants. Most employees are based in Stockholm, but Haypp Group also has presence in Norway, Spain, Germany, Hungary, Croatia, the United Kingdom and the United States.

Haypp Group does not have a significant changes in employees due to seasonality, with permanent employees performing a significant portion of activities. During peaks in orders, additional warehouse resources might temporarily be brought in, however, this is most often handled by increasing our permanent staff.



A sustainable business model

Haypp Group has a sustainable business model that makes sure our business and operations have a clear relationship to our sustainability strategies and vice versa, so that sustainability is incorporated into the business actions. The fundament of the business model rests on five strategic areas for sustainability that are in line with our vision and higher purpose.



Health contribution, how Haypp Group can help people convert from smoking, and other tobacco-products, into less harmful alternatives among oral nicotine products.



Best place to work, aspiring to be the best employer for all at Haypp Group.



Insights for all, working with the data Haypp Group, as an e-commerce company, has access to in order to help develop products, form relevant market controls and develop new alternatives.



Sustainable innovation, the data can contribute to sustainable growth and development together with business partners and consumers.



Business ethics, at the centre of the sustainable business model. With business ethics at our core, we are guided to apply a high level of ethics when operating a business within e-commerce and the oral nicotine area.

Business concept

The circle on the right shows the business concept for an e-commerce retailer with the consumer at focus of our business. The business starts with managing the consumer experience, where we reach out to a broad consumer base and advocate for healthier non-smoking alternatives. Then we assist in finding our customers the most appropriate solution.

This enables us to gain a more comprehensive understanding of the consumer. By utilising this knowledge, we constantly evolve and improve our customer's journey. Our insights are the driving force for the whole industry to create great quality products, provide superb product offers, and produce in a responsible and sustainable way.

Solid, scalable, and successful

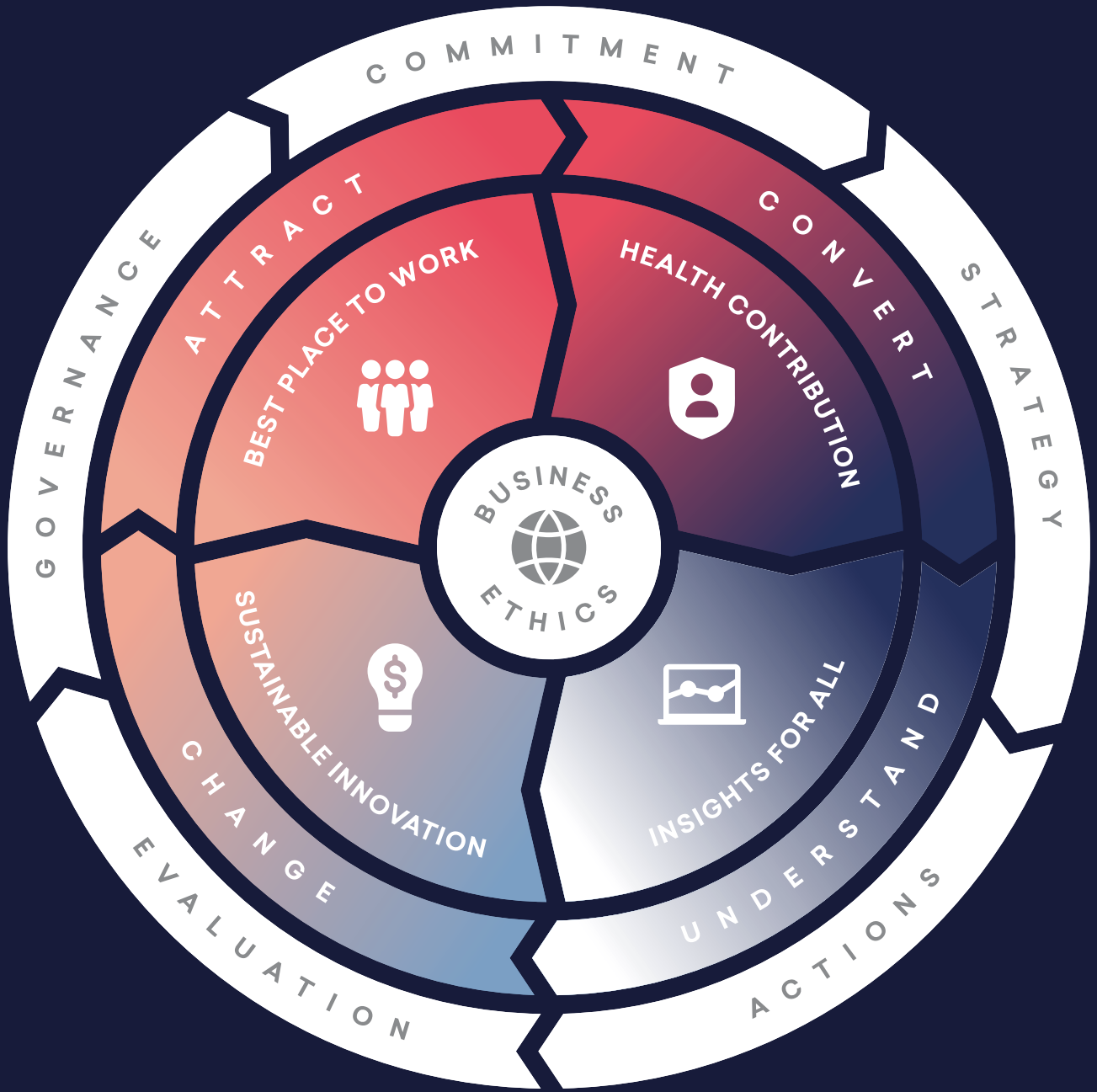
Our business model is solid and scalable. It is a model with proven success that has resulted in increased consumption

across a broader range of consumer profiles. In comparison to the rest of the industry, it has also resulted in increased sales of premium products and tobacco-free nicotine pouches – the incorporated strategic areas of the model.

Haypp Group's business model has sustainability in focus and connected to our operations, so that our contribution to sustainability, wellness and society go hand-in-hand with our business success. The better business we do, the better for society as a whole.

Sustainability Scorecard to drive change

In order to continuously monitor our progress of inspiring healthier enjoyment for millions, as well as encouraging individuals to switch from smoking to oral nicotine products, Haypp Group has a sustainability scorecard. The scorecard sets out strategically focused KPIs, that Haypp Group has identified, to measure progress and take concrete action to achieve our purpose. Through the scorecard, the business concept and operations get a clearer connection to our different strategic areas.



Health contribution



Consumer health is a matter of concern for everyone in the industry. To us, everything we do is focused on better consumer health, saving lives, and reducing the use of tobacco and the harmful effects of smoking.

Manufacturing or supplying products for daily commodity trading, especially products containing chemicals and additives, is heavily regulated. And we're at the forefront of developing new industry standards.

For Haypp, working with consumer health means respecting and enforcing age restrictions, being transparent with product information, and labelling products so that consumers can make informed choices.

Not only is it the right thing to do, but it also makes good business sense. In addition, we offer nicotine-free alternatives for customers that wish to reduce their nicotine consumption or would like to quit altogether.

We support and encourage initiatives that promote healthy user habits including sports and other activities that add to a well-balanced life. This is in line with our own values and the expectations from our stakeholders.



Health contribution indicators that Haypp Group tracks includes

CUSTOMER BASE AND GROWTH

Users of oral nicotine have made the active decision to use significantly less harmful nicotine products. A sizeable proportion of these users previously would use nicotine alternatives resulting in several health-related issues or even death. Within oral nicotine users there is a certain focus on the amount of purchasing customers of nicotine pouches.

GLOBAL TOBACCO DEATHS DECREASE

Decreasing the number of deaths due to tobacco is fully in line with the purpose of Haypp Group. Estimating the number of lives Haypp Group helps save by offering risk-reduced oral nicotine products to adult consumer who would otherwise use harmful tobacco products.

PROLONGED LIFE EXPECTANCY

An individual which makes the conscious decision to either stop using tobacco and nicotine altogether, or secondarily choose a safer alternative will have a prolonged life expectancy. Those individuals who purchase from Haypp Group will have a quantifiably prolonged life expectancy which is longer the earlier in life they decide to convert.

NUMBER OF QUITTERS

Sharing information based on data and insights of how many and which of our customers have prevailed in the battle against smoking and harmful tobacco-use.

The health contribution of our business gives individuals a better quality of life and significantly improves public health.



682,000

Purchasing customers

117,965

Lives saved



1960

1980

2000

2020

2040

2060

2080



Peter switched at 60, his life expectancy was 67 years. Now it's 71!



Victoria switched at 41, her life expectancy was 71 years. Now it's 80!

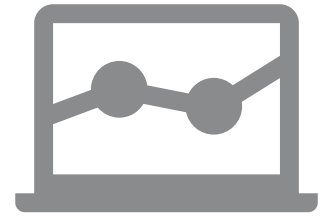


David switched at 20, his life expectancy was 72 years. Now it's 82!

2,382,812

Years saved

Insights for all



To potentially save millions of lives every year, we aim to be a worldwide source of essential health-related information and insights. We're committed to reducing risk while developing an understanding of how tobacco-related death can be avoided. We believe spreading the word is the way to support the global efforts for increased health awareness, as well as growing our business together with others.

Through investment in data analysis, Haypp Group has become the leading research and insight provider within the oral nicotine category. These insights are shared with business partners and externally – so we can improve business and the category together. As an e-commerce business, we handle large quantities of consumer data, through which we gain new insights.

These insights give Haypp Group the opportunity to contribute to both market development and product innovation, as well as consumer research and regulations. Within public health and related policy enhancements, we always use factual, evidence-based information as a basis for decision-making.

Insights' indicators Haypp Group track includes

A DRIVING FORCE FOR HEALTH AND SHARING OF INSIGHTS

As Haypp Group builds insights and provides researchers with quantitative data, we have seen a need for a forum to share and discuss the oral nicotine category – its developments, challenges, and opportunities. In 2021, Haypp Group therefore supported the launch of a global oral nicotine symposium "Post Tobacco", where regulators, trade, academics, media, NGO and public health activists could meet. The reach for the symposium was 17,830 viewers.

Meanwhile, the data Haypp Group deals with is shared with external stakeholders, including suppliers and other major industry participants, but also researchers' and other external parties. During 2021 data extractions for external users amounted to 20 external organisations.

ENLIGHTENED PUBLIC AS EDUCATED CUSTOMERS MAKE CONSCIOUS DECISIONS

Insights from our consumers' data, and research from others, need to be shared widely and specifically reach consumers using harmful tobacco – as well as the public. When understanding the relative risks of nicotine products, consumers can make their own decisions for healthier enjoyment and inspire others. We highlight other's initiatives, as well as taking our own actions, focused on current tobacco-users to encourage them to quit. We do this through different Haypp Group editorials and market related blogs and journals. These sites have during 2021 had 1,225,375 visitors.

We always represent our customers in public conversations. Our aim is to provide stellar service and information about our products and their impact on health, our environment and society at large.



20

of external organisation using Haypp Group data

17,830

in reach through oral nicotine forum

+1,200,000

visits on editorial sites

Sustainable innovation for growth and development



As one of the global leaders in consumer insights in our field we can lead a sustainable product development. We are constantly looking for new ways to provide more sustainable products. Specifically smoke and tobacco-free products with a balanced nicotine content. With our focus on converting smokers to tobacco free nicotine pouches we are convinced that our growth in the global market will go hand in hand with more healthier nicotine users.

Our entire product range should maintain a high sustainability standard. The products and services we offer to the market shall meet or exceed our high standards for quality and sustainability. And in some

cases, we set a new higher standard for the industry. We believe that we as one of the global leaders in consumer insights in our field, can lead product development from a customer and market perspective.

Sustainable innovation for growth and development indicators Haypp Group track include

SUPPLY CHAIN SUSTAINABILITY

As new suppliers enter the market and engage with Haypp Group they are screened based on the Supplier Code of Conduct. All the suppliers (100 %) who were listed in 2021 who passed the initial screening fulfilled the requirements. Based on this, our intention is to deepen the evaluation and raise the bar.

PRODUCTS FOLLOWING TO STANDARD

The oral nicotine category has grown rapidly. However, there is still a great lack of regulations and procedures for nicotine pouches to follow. Manufacturers and suppliers may be certain about their own products, but how can others be when there are no standards to follow?

Haypp Group believes consumers, as well as authorities, researchers, and journalists should be able to access more reliable knowledge. The information asymmetry for consumers is reduced when standards are put in place that products can be measured against.

Throughout the year for 2021, Haypp Group has invested over 2.7 million SEK in product testing of nicotine pouches and making it available on [NicoLeaks.com](https://nicoleaks.com). Of Haypp Groups nicotine pouch portfolio 87 % has gone through testing.

CARRIER RESPECTIVE CONSUMER FOOTPRINT SUSTAINABILITY

Measuring of carbon monoxide equivalents in the value chain is desirable. Currently Haypp Group has a fragmented picture due to partial data. For a clearer picture, data is planned to be compiled in 2022.

PACKAGING OF PRODUCTS

In Haypp Group's operation, cardboard is a common material used as outer packaging of ordered goods. Hence, the level of material used is relevant as a guideline to follow. In 2021, the main warehouse located in Sweden consumed 110 378 kg of cold-sealed cardboard in its automatised production line, giving approximately 60 gram per order. A further 43 749 kg of cardboard and bags were used in production and manual packaging, whereof approximately 28 451 kg in shipments between Haypp Group and its carriers.

As one of the global leaders in consumer insights in our field we can lead in sustainable product development.



100 %

of suppliers screened on sustainable value chain

87 %

share of nicotine pouches portfolio
tested against market standard

154 tons

of cardboard packaging used
in Swedish operations

The best place to work



We know that Haypp Group improves when our employees reach new levels in their own development. By promoting equality, diversity and inclusion, the people involved in Haypp Group's operations and development can move mountains.

Knowing and embracing the long-term ambitions of the group, and saving lives with our company initiatives and values, is key. In the same way, it should be clear that there are limitless opportunities for everyone. There are

opportunities for employees to improve themselves in leadership, sustainability, and innovation. This creates value for employees, customers, the company, as well as society at large.



Best place to work indicators Haypp Group track include

FOLLOWING EMPLOYEE SATISFACTION

We make a constant effort to listen to all our employees' opinions and voices. We take into consideration how it is to be employed by Haypp Group and we regularly perform employee opinion surveys (EOS). From these surveys, we learn what we need to work on as an employer, how to keep employee satisfaction high, and, concerns that may need addressing or questions that might arise. In 2020, the employee satisfaction score was 65 %, in the EOS of 2021 the new score was 87 %.

EMPLOYEE DEVELOPMENT BY PLATFORMS AND COACHING CULTURE

To spread knowledge and support employees in their work, and how this relates to our

higher purpose and business ethics, we utilise e-learning. A system has been put in place during 2021 and it is aimed for additional e-learning to take place in 2022. An important part of employee development is to have a good coaching from above. In 2021, a total of 73 % of employees said they had received useful feedback.

EMPLOYEE TURNOVER AND RETENTION

Throughout Haypp Group's history the company has grown and expanded rapidly. During 2021, the focus has been redirected to sustain a positive trend. This means attention has begun to shift towards monitoring the turnover, as well as retaining the most valuable employees.

We give our employees the right conditions to reach the next level.



73 %

of employees receive useful feedback

87 %

employee satisfaction



Business ethics



The consumer is the focus of our business. For sustainable business growth, it's fundamental to earn their trust so that we can continue our relationship with them.

To continue to deliver successfully to our current and future customers, we must hold ourselves to the highest ethical standards. We have policies in place to prevent all forms of corruption, bribery and extortion. Our aim is to ensure proper behaviour that guides us in conflicts.

Ethical behaviour is fundamental to the way we want to do business. It's also necessary to place higher demands on both us and our suppliers, in order to realise our goal of leadership in our market. To support this, we make sure

that everyone is both able and comfortable to report and share their experiences. We also have a "whistle blowing" mechanism in place.

Our ethical standards are key to maintaining the highest level of consumer confidence. Consumer confidence is needed to gain crucial insights and learnings, so we're able to be the modernising and converting force that we have the potential to be.



Business ethics indicators Haypp Group track include

CODE OF CONDUCT INTRODUCED

As Haypp grows, both in terms of business, and with the number of employees and business partners, the need to have clear guidelines on how we operate is paramount. Not only is it a declaration of how we act, and the standards we commit to, but it's also a tool for compliance and to gain learnings from. Which can then be developed and utilised even further. In 2021, the Code of Conduct for all employees and full-time consultants was rolled out. Through the year employees participated in training through e-learning and by end of 2021 85 % of the employees had completed the training.

During 2021 no incident or report of bribery or corruption has been reported.

SUPPLIER CODE OF CONDUCT PART OF NEGOTIATIONS

Add the end of 2021, each of the negotiations Haypp Group has with its suppliers of goods led to a 100 % coverage.

CUSTOMER PROMISE AND SATISFACTION

When asked, customers stated that the most important thing when dealing with Haypp Group was that we honour the price promise given at purchase. This means that the right product is delivered in the right way, and at the time communicated. Customers are asked for their opinion which results in a customer satisfaction score. In 2021, the customer satisfaction score was 4.4 out of 5.

In order to continuously deliver successfully to our current and future customers, we must hold ourselves to the highest ethical standards.



85 %

finished the training on Code of Conduct

100 %

of suppliers acknowledged the
Supplier Code of Conduct



in customer satisfaction

Logistics and value chain of oral nicotine products

From suppliers to enlightened consumers who have made a choice

Every day, Haypp Group sends about 9 250 packages to customers around the world making a total of almost 3.4 million orders in 2021. The products are manufactured all over the world, but Haypp Group purchases the products from suppliers in Europe and the United States.

Haypp Group continued its planned investments and changes in its warehouse infrastructure during the year of 2021. After in 2020 changing one of its warehouses in the United States, as well as establishing a Swedish warehouse, Haypp Group established its own warehouse in Norway at the end of 2021. Additional infrastructural changes with more warehouse capabilities over Europe and in the United States are processing as planned and will take place during 2022 with opening of additional facilities in the United States and European markets.

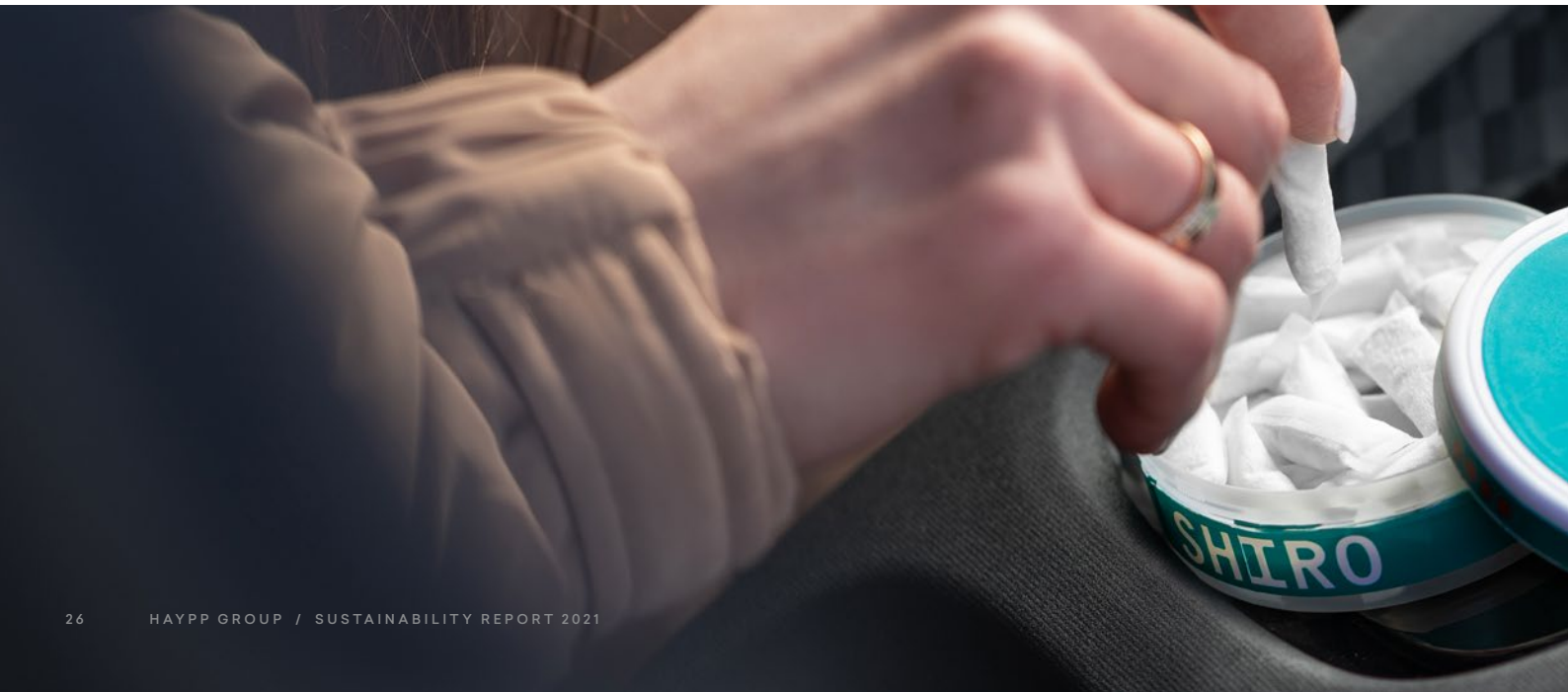
In 2021, we had a total of 6 operational warehouses, of which 3 were external third-party (3PL) warehouses by the end of the year when the Norwegian operation had moved into our own warehouse instead of a 3PL. The warehouses were in Sweden, Norway, Denmark, and the United States.

Much of the work is manual, but in the warehouses in Sweden the work is facilitated by picking and packing machines as well as the new Norwegian warehouse. The packages are pre-sorted and sent with any of the shipping

methods locally available to either the customer's door or a selected parcel delivery point. The customer receives the package within 1-5 days, depending on the customer's location and choice of delivery method.

As Haypp Group has its own warehouse in Stockholm, and now also in Oslo, it means that the transport distance between the warehouse and most of our Swedish and Norwegian customers has become significantly shorter. As an effect, fewer packages need to travel long distances and means to optimise the package delivery, from an operational and logistical perspective, are reviewed and implemented continuously.

Furthermore, Haypp Group has increased the volume with carriers that invest in green deliveries with, for example, electric cars or where possible also emission-free alternatives of last mile delivery. The warehouse in Stockholm also has a large part of its electricity supply from solar cells on the roof, which is a positive environmental effect that was not available in the previous external warehouse, similar applies for Oslo.



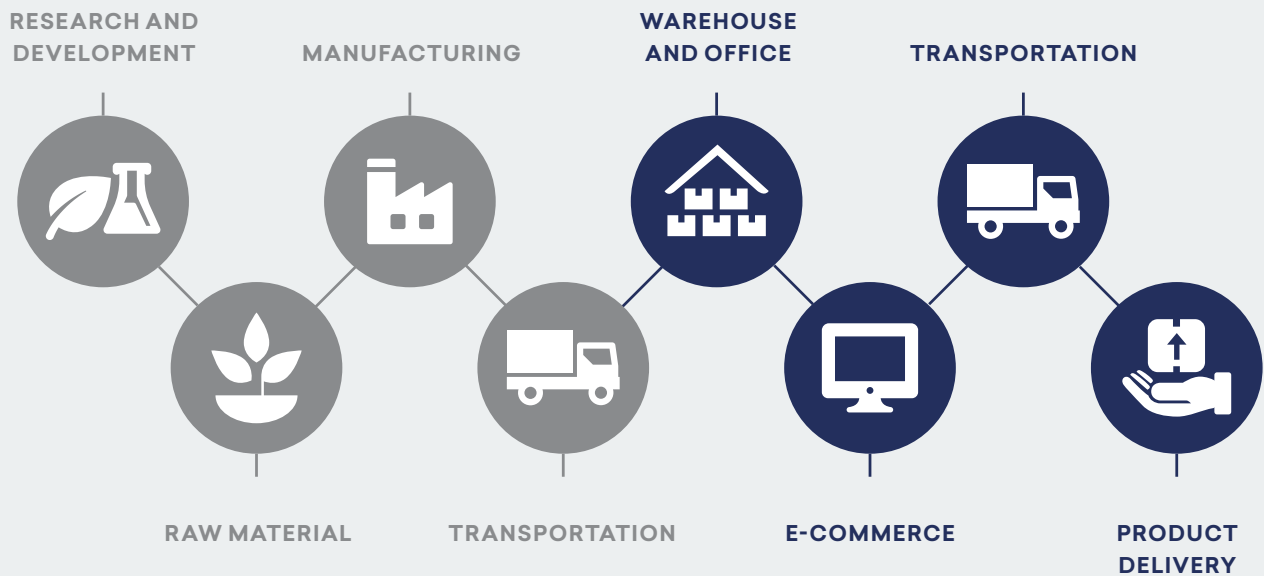
The value chain

The value chain ranges from product research and development, raw material sourcing and production, processing and manufacturing at suppliers, distribution and transportation to our facilities. After purchase through our e-commerce additional transportation is necessary for the products to reach the customer. It is the individual consumer who finally disposes of the packaging and the actual product itself after enjoying it.

The development of new products as well as raw material sourcing our ability to influence is low, like the manufacturing and inbound transportation.

Haypp Groups ability to influence the warehouses and other facilities are though much higher, just as how the e-commerce is presented and operated.

The transportation from our facilities to the consumer we have a medium influence on as it depends on negotiations with carriers as well as customer preferences. The influence on the actual consumer including the disposal of product is low, nevertheless it is an important part of our sustainability efforts as we believe that enlightened people will make better choices.



Calculation of lives and years saved

In order to be able to measure two of our most important KPIs, the number of lives saved, and the number of years saved, Haypp Group has, together with external partners, come identified a means to calculate the KPIs based on research by Professor Prabhat Jha at the University of Toronto.

Calculation of lives saved

The basis for the calculations is (i) the share of former smokers saved from dying in smoking attributable diseases by quitting, (ii) No. of Haypp Group's active customers and (iii) share of customers stating that they quit by using products sold by Haypp Group. This calculation can be made for both snus and nicotine pouches. Based on such calculations, it is estimated that total of 117 965 lives were saved due to the healthier product alternatives sold by Haypp Group in 2021.

CALCULATION OF LIVES SAVED

(i) 40 per cent of former smokers' lives are estimated to be saved due to quitting. (ii) Haypp Group had slightly over 283 000 active snus customers in 2021, (iii) 52 per cent of the active snus customers stated that they have quit smoking. By multiplying the values, it is estimated that 61 065 lives were saved due to snus products sold by Haypp Group in 2021.

CALCULATION OF LIVES SAVED

(i) 40 per cent of former smokers' lives are estimated to be saved due to quitting (ii) Haypp Group had about 230 000 active nicotine pouches customers in 2021, (iii) 59 per cent of the active nicotine pouches customers stated that they have quit smoking. By multiplying the values, it is estimated that 56 900 lives were saved due to snus products sold by Haypp Group in 2021.



Calculation of years saved

The basis for the calculations is the number of people who quit smoking using products sold by Haypp Group, multiplied with the share of smokers saved from dying by quitting, multiplied with the gain in life expectancy by quitting smoking. For example, life expectancy is assumed to increase by 10 years if a person stops smoking before the age of 35, 9 years before the age of 45, 6 years before the age of 55 and 4 years between the age of 55 and 64.

It is estimated that snus products have saved 1 216 187 years and nicotine pouches 1 166 625 years. In total, it is estimated that products sold by Haypp Group has contributed to saving 2 382 812 years in 2021.



Haypp Group's Cultural values

The necessary action taken as part of the restrictions related to the Covid-19 pandemic led to several challenges in terms of preserving and developing the company culture of Haypp Group, especially as it coincided with an intense growth in number of employees. Digital gatherings ranging from quizzes, lunches and coffee breaks to formal meetings took place and all employees were encouraged

to call and use video meetings to maintain interactive and social contacts with colleagues. As restriction began to be lifted a in depth dialogue was initiated which included both quantitative and qualitative methods inviting all employees to participate to define and form our culture as we enter a new normal. This work resulted in the Haypp Group's Cultural values.

Badass teamwork

At Haypp Group, we utilise each other's competences through cross-functional collaboration and are always happy to help a colleague out. We hire for diversity in personality, background and capability; and we fully appreciate what everyone's uniqueness brings to the table. We believe that all of us are better than just one of us, and we foster open discussions to get a diverse perspective on our work. We're honest, transparent and give feedback to help each other reflect and become better. In addition, we make sure that everyone feels like a valued member of the team, and we encourage an environment where everyone is comfortable enough to speak their mind.



CORE SUCCESS BEHAVIOURS

- We accomplish things together with a cross functional approach
- We are always ready to help each other out
- We foster reflection in order to learn and grow
- We seek diversity in opinions, personality, backgrounds and capabilities

Encourage innovation

At Haypp Group we embrace all ideas, no matter where they come from, and we encourage each other to step outside of our comfort zones. To learn, grow, and develop we know we must try new things. "Not invented here" does not exist with us. Since we are transforming industry, change is in our DNA. We drive that change through ongoing and focused improvements. We spend our time on creating a better tomorrow, learning from mistakes and trusting our co-workers intentions and competences. We have faith that everyone is trying to do what is best for Haypp Group.



CORE SUCCESS BEHAVIOURS

- We welcome and nurture all ideas no matter where they come from
- We try new things and learn from it.
- We embrace and celebrate change
- We trust in each other



No douchebags

Our organisation is flat and non-hierarchical - everyone has a voice and everyone is listened to, regardless of position. When working at Haypp, we keep our tone nice and friendly, greet each other with a smile, and contribute to a positive and fun atmosphere where people can feel at home and be themselves. We show appreciation and make people feel valued. And we genuinely care about each other's well-being - after all, healthy and well-rested people make the smartest decisions. If we ever feel like someone is not being properly included or represented, we advocate for our team members - because we are stronger together.



CORE SUCCESS BEHAVIOURS

- We listen to what everyone has to say
- We are welcoming and inclusive
- We keep a friendly tone and contribute to a fun and positive atmosphere
- We show appreciation and care about each others well-being

Dive in head first

Haypp Group is all about seizing opportunities and accomplishing what we set out to do - we go for it. Our purpose is clear, our goals high and unified. We focus our time on objectives that generate value and do not confuse the process with the goal. We keep it simple and work smarter not harder. Meanwhile, we perform and deliver hands-on, high-quality work where everyone is ready to chip in. We can depend on each other to take ownership and deliver what we promise. We take pride in what we do and the difference in the world that we are making. We are ready to go the extra mile for our success - we do not settle. But most importantly: we never forget to celebrate.



CORE SUCCESS BEHAVIOURS

- We take action, go for it and make stuff happen
- We set clear and high goals and celebrate when we reach them
- We deliver quality and we are dependable
- We perform without prestige while keeping it simple
- We are proud and passionate of what we do



Sustainability ambition

As an industry leader, Haypp Group recognises that we can contribute to a better and more sustainable world. Here, we go into our ambition, commitment, and approach to sustainability. It is our statement for how to optimise our contribution to sustainable development.

Our long-term goal is that we through our sustainability efforts are seen as a frontrunner in sustainable e-commerce, as well as spearheading the global transformation from smoking to healthier product alternatives. The ambition is essential for our core operation and our entire business concept.

1. SYSTEMATIC APPROACH

To optimise our contribution to sustainable development and the Global Sustainable Development Goals, we are tackling sustainability in a systematic way. Haypp Group follows the best practices and EU recommended international guidelines. We're guided by the globally accepted standard for sustainable business ISO 26000.

2. STAKEHOLDER DIALOGUE

To achieve our sustainability goals, we need to work together with clients, partners and suppliers. That is why Haypp Group has an active dialogue with our most important stakeholders and stakeholder groups – starting with employees and customers around the world. This is done to calibrate our sustainable efforts so everyone gets as much support and autonomy as possible.

3. MATERIALITY ANALYSIS

To fully understand what Haypp Group can and should do – we engage in a win-win analysis. We want to make sure that we do what maximises value creation for most stakeholders – clients, employees, partners, suppliers, society at large, as well as for our shareholders/owners. We do this according to our unique terms and conditions, and use the UN Sustainable Goals: 3, 5, 8, 10, 12, 13, 16 and 17 to guide us. This allows us to contribute, without compromise, to the global communities' achievements.

4. BUSINESS INTEGRATED SUSTAINABILITY STRATEGY

Our analysis points Haypp Group in a clear direction. A direction where we can maximise our contribution to sustainable development in a way that contributes to the company's overall long term performance. We see sustainability as a natural part of our daily business, and manage it in the same way we manage any other strategic issue. Every idea we nurse produces short term value or has the potential to create long term value for shareholders.

5. PRACTICAL RESPONSIBILITY

Action speaks louder than words. We know that whatever we do for a sustainable world is far more important than what we say. That's why we will always prioritise practical action, before communicating or reporting – though we of course, recognise the need to spread best practices and dialogues.

6. REPORTING AS A LIVING ENTITY

Our business review embraces all strategic activities. Sustainability is one of them. We choose to present our case in a practical way with a forward-looking and practical approach. All our sustainability reporting work will be compliant with law, using the best available and most cost-efficient methods that create value for the user – whoever they may be.

7. AS AN INDUSTRY LEADER WE CAN CONTRIBUTE TO CHANGE

The world needs sustainable development – where economic, environmental and social aspects are all in balance. Through the UN Global Goals for Sustainable development – Agenda 2020 – the global community has set the standard for how this balance can be reached. It takes the effort of nations, civil society, individuals, and corporations, to make it happen. Haypp Group recognises that we can contribute – and wants to be held accountable for it.

Stakeholder dialogue

Haypp Group conducted a materiality and stakeholder analysis in 2020 and the information is the basis for our sustainability work. Without our stakeholders, Haypp Group as a company will not prosper – it is only together that we can achieve great things. That is why we have a stakeholder dialogue system in place. To validate our sustainability strategy and material analysis, our aim is to have systemic interaction with each stakeholder group every three years. Extended stakeholders are key to understanding the expectations of the group's sustainability approach.

Through the stakeholder analysis Haypp Group has identified our most important stakeholders, which are;

1) our customers, 2) our employees, 3) our owners and board, 4) business partners and suppliers, 5) public authorities, as well as 6) media, academics and non-governmental organisations (NGOs) including the associations where we are members. Stakeholders have subsequently been valued based on how they affect or are affected by Haypp Group. To prioritise and co-operate on sustainability issues, the stakeholder dialogues have been carried out within these categories. They are done in a structured and systematic way to reflect on progress made, or when new topics arise. The idea being that whatever is relevant for our stakeholders, is consequently relevant for us.

STAKEHOLDER	INTERACTION AND DIALOGUE OPPORTUNITIES	STAKEHOLDERS' ESSENTIAL QUESTIONS
CUSTOMERS	<ul style="list-style-type: none"> Web site Order confirmation Customer service Mail about delivery Newsletter Social media Reviews online Editorial sites and opinion pieces in external media Surveys and polls 	<ul style="list-style-type: none"> Ethical Business Conduct Sustainable product development Consumer information Consumer health Transport Packaging Climate action
EMPLOYEES	<ul style="list-style-type: none"> Conversations in daily activities Weekly town hall meetings emails Employee survey Development and coaching conversations Management meetings Department meetings Company gatherings Staff Handbook 	<ul style="list-style-type: none"> Climate impact Safe workplace Environmentally friendly transport Sustainable range Contribute to a healthy lifestyle Sustainable suppliers Reduce packaging / plastic Consumer health Working environment Consumer information
OWNER/BOARD	<ul style="list-style-type: none"> Annual report Annual General Meeting (AGM) Board meetings and presentations Participation in daily activities Workshops Strategy discussion 	<ul style="list-style-type: none"> Healthy finances Well-functioning organization Climate impact Environmentally friendly operations Safe workplace Reduce packaging / plastic in operations
BUSINESS PARTNERS & SUPPLIERS	<ul style="list-style-type: none"> Emails, meetings, telephone Contact persons Contract negotiations Study visits in logistics Market activity collaborations Insight gathering activities 	<ul style="list-style-type: none"> Business ethics Wide and sustainable product range Alternative packaging material Profitable business agreements Brand and product development
PUBLIC AUTHORITIES	<ul style="list-style-type: none"> Emails, meetings, telephone Contact persons Licenses, supervision Regulations and consultations 	<ul style="list-style-type: none"> Climate impact Compliance Addiction Protection of youth
MEDIA, ACADEMICS, NGO & OTHER	<ul style="list-style-type: none"> Cooperation agreement Memberships Data base Emails, meetings, telephone Editorial and opinion pieces Research project, thesis 	<ul style="list-style-type: none"> Climate impact Health contribution Addiction Community voice

Customer priorities

WHAT IS IMPORTANT?	DESCRIPTION	WHAT WE DO AT HAYPP
 <p>KEEP OUR PROMISE</p>	<p>Responsibility wise, the most important issue for our customers is that we keep our promises in price, quality and service.</p>	<p>Creating a good customer experience is paramount. Hence, to pick up on what our customers want, we always keep our ear to the ground. This informs how we can develop the entire customer experience – from first contact and use, to when it's time to buy something new from us again.</p>
 <p>CLIMATE</p>	<p>The climate issue is in everyone mind and on all lips. Each company must take responsibility – us included.</p>	<p>We are constantly looking for more sustainable products to sell. We encourage testing of more sustainable materials, e.g. corn plastic or paper in our packaging. We are trying to phase out black plastic packaging from suppliers which is difficult to recycle. We use as much recycled material as we can in the packaging process. And we try to work with the best fossil-free transporters. To put it simply, we do what we can, as an e-commerce company, to be at the forefront of the sustainability movement.</p>
 <p>TRANSPORT</p>	<p>Transport is a contributing factor to our climate issues.</p>	<p>In our logistics, we are always looking for new ways to minimise our impact on the climate. We believe we have the best partners available, and we work together with suppliers, service providers and customers to improve even more. One way we do this is by asking our customers not to send back incorrect deliveries. Another way is to increase the purchasing intervals for subscribers.</p>
 <p>PACKAGING</p>	<p>Packaging, and how we do it, can always be better.</p>	<p>We think that we have come a long way in this regard. We maximise orders and try to convince customers to buy in a way that the “air” in the transport is minimised. And, of course, we use as much recycled and renewable material as possible. We also encourage suppliers to produce cans of recycled and/or bio-gradable material.</p>
 <p>PRODUCTION</p>	<p>Expectation of influence over manufacturing</p>	<p>Though we don't have our own production, but we do what we can to support product development with our suppliers. Through dialogue, collaboration, and our own tests, we always try to find the most sustainable suppliers and production methods</p>
 <p>ADDICTION</p>	<p>Nicotine addiction is a global challenge. Though very few of our customers raise the issue, it does come up. So, it's crucial that we handle it respectfully. Nicotine is a addictive substance, yet it holds a lot of possibility to move to less harmful alternatives.</p>	<p>In our development dialogues, both internally and externally, the issue of nicotine-related addiction is always present. And for our credibility in the market, it's extremely important that we handle it in the right way. We work with experts to figure out how we can minimise risks and maximise the conversion from unhealthy “smoke-based nicotine” to oral nicotine-use. Both conversion and risk reduction have the potential to save millions of lives around the world every year.</p>

Membership of Associations

Haypp Group is a member of several trade associations that allow Haypp Group to further gain insights, communicate its message and inspire change in the larger industry of e-commerce relating to questions that are important to Haypp Group and our stakeholders.



Sweden

- The Association of Swedish Advertisers
- Stockholm Chamber of Commerce
- The Swedish Federation of Business Owners
- Swedish Trade Federation
- Sustainable E-commerce
- Swedish Digital Trade Association



Norway

- Federation of Norwegian Enterprise, e-commerce



United Kingdom

- The Swedish Chamber of Commerce for the United Kingdom



Switzerland

- The Swedish-Swiss Chamber of Commerce



United States

- The Swedish-American Chamber of Commerce



Germany

- The Swedish Camber of Commerce for Germany

External initiatives

Haypp Group subscribes to and follows external initiatives to support environmental and social topics. For example, Haypp Group subscribes to and follows the UN Global Goals, having selected a number of goals to focus particularly on. Haypp Group follows the ILO conventions ensuring fair working conditions and human rights.



Our contribution to the Sustainable Development Goals



For sustainable development, and to address the global challenges we face together, Haypp Group supports the global goals of the 2030 Agenda for Sustainable Development as a universal call for action. By using the 17 SDGs, with its 169 targets and associated indicators, we get a framework to follow and operate within. This is necessary to achieve sustainable development that allows both social development and economic growth, without endangering the planet's ecosystem or jeopardising the climate. Haypp Group follows the development and strives to contribute in a concrete way to many of them.

As part of our materiality analysis and sustainable business model, we have reviewed the SDGs and have decided to focus on the goals where we can have the most meaningful impact. Goals where we have tangible commitments and objectives connected to the detailed targets set for the identified SDGs. A total of 8, out of the 17 SDGs, are focus goals and mentioned below. The main SDG for Haypp Group is identified as SDG 3 of **Health and Wellbeing**. This is in line with the higher purpose and core of our business – to inspire healthier enjoyment.

In addition to this, the following has been identified as our other primary SDGs to focus on:

- SDG 5 **Gender equality**
- SDG 8 **Decent work and economic growth**
- SDG 10 **Reduce inequalities**
- SDG 12 **Responsible consumption and production**
- SDG 13 **Climate action**
- SDG 16 **Peace justice and strong institutions**
- SDG 17 **Partnerships for the goals**

We also contribute to several remaining SDG goals through our general business contribution and other engagement. Based on the materiality analysis and continued stakeholder dialogues we don't anticipate any major changes to our SDG focus in the short term, though possibly we could add additional SDG in the medium term.

3

GOOD HEALTH AND WELL-BEING

12 RESPONSIBLE CONSUMPTION AND PRODUCTION



16 PEACE, JUSTICE AND STRONG INSTITUTIONS

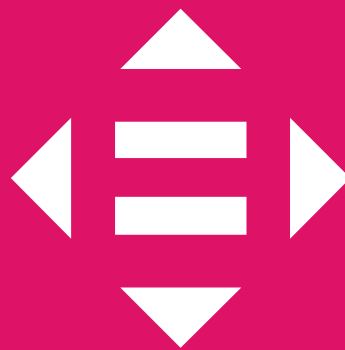


5 GENDER EQUALITY



HAYPP GROUP

10 REDUCED INEQUALITIES



13 CLIMATE ACTION



17 PARTNERSHIPS FOR THE GOALS



8 DECENT WORK AND ECONOMIC GROWTH



Our selected goals



The greatest possibility for Haypp Group to contribute to the SDGs is through goal number 3. Every 2 seconds someone aged 30 to 70 years dies prematurely from noncommunicable diseases – cardiovascular disease, chronic respiratory disease, diabetes, or cancer. And the reality is that the single most contributing factor to these deaths is smoking. Haypp Groups' higher purpose relates directly to our health contribution and harm reduction found in the materiality analysis.

- **Target 3.4** – Reduce mortality from noncommunicable diseases and promote mental health. Work towards our higher purpose of healthier enjoyment for millions, and offer less harmful alternatives to cigarettes through oral nicotine products.
- **Target 3.A** – Implement the WHO framework convention on tobacco control. With the indicator 3.A.1 of age-standardised prevalence of current tobacco use among people aged 15 years and older.

We inform consumers about the addictive nature of nicotine and the health effects related to smoking tobacco. This means a no-nicotine rule for all under 18's. We do not direct any marketing, advertising or promote any products containing nicotine to individuals under the age of 18.



As an employer, Haypp Group has a responsibility to promote gender equality at all levels to ensure the same rights and empowerment of all women and girls. We strive to be a truly open and inclusive employer with zero tolerance for discrimination. We aim to have a diverse workplace with all employees entitled to the same opportunities in order to fulfil their full potential.

- **Target 5.1** – End discrimination against all women and girls. At Haypp Group we do not tolerate discrimination, including that based on gender.
- **Target 5.5** – Ensure women's participation and leadership in decision-making.

A diverse workplace performs better, and it also requires gender balance at senior levels of the organisation. Here, Haypp Group has a focus as balance has previously been lagging.

8 DECENT WORK AND ECONOMIC GROWTH



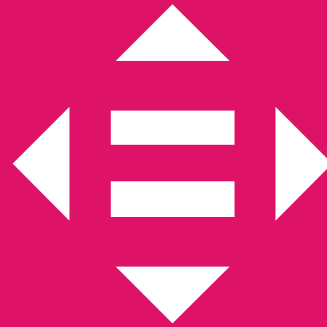
For a fast-growing entrepreneurial company such as Haypp Group, economic growth and development is imbedded in the company's DNA. Any activity or roadblock that affects an individual or group due to gender, age, disabilities or another form of discrimination is contrary to sustainable development. This rule applies to both our own and our partner's workforce.

- **Target 8.5** – By 2030, we should achieve full and productive employment and decent work for all women and men, including young people and those with disabilities. With equal pay for work of equal value. Haypp Group are active within the male dominated industry of tobacco and nicotine, and similarly in e-commerce. It is therefore vital to have processes for promotions and recruitments which are non-discriminatory with fundamental conditions like the right to equal pay for equal work.

Target 8.7 – Take immediate and effective measures to eradicate forced labour, and put an end to modern day slavery and human trafficking. To secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and an end to child labour, in all its forms, by 2025.

Even though Haypp Group doesn't produce or source from high-risk countries itself, in the matters mentioned in 8.7, we do business with companies that do. When screening all types of international agricultural supply chain, such as tobacco, risk factors should be observed. Therefore, we're very clear with our no tolerance rule for these issues in our business partners supply chain. Haypp Group believes in humans, for their responsibility to each other, but foremost, for every human being's right to freedom.

10 REDUCED INEQUALITIES



Haypp Group strives for a truly open and inclusive environment where there's no room for discrimination and all employees are given the opportunity to reach their full potential. Who you are, where you come from, where you are headed, or who you want to be, should never limit you. This can only be done through cultivating a diverse workplace, where we are aware of all forms of prejudice and unconscious biases in order to prevent discrimination.

- **Target 10.3** – Ensure equal opportunity and reduce inequalities of outcome. Eliminate all discriminatory laws, policies and practices, while promoting appropriate legislation, policies and actions for equality.



Today, by its nature, all commercial consumer goods have a certain level of waste in its supply chain, either up or downstream, or both. We need to move towards a circular economy where we reuse, then recycle.

- **Target 12.4** – By 2020, achieve environmentally sound management of chemicals and all waste throughout their lifecycle. This should be in accordance with agreed international frameworks to significantly reduce their release into air, water and soil to minimise their adverse impacts on human health and the environment.
- **Target 12.5** – By 2030, substantially reduce waste generation through prevention, reduction, recycling and re-using.
- **Target 12.6** – Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.
- **Target 12.7** – Promote public procurement practices that are sustainable, in accordance with national policies and priorities.

At Haypp Group we have begun to assess risk and work to reduce the negative impact our operations could have. We recognise the importance of engaging suppliers and other stakeholders to also take action, and together with us work for a more responsible production and consumption. As a dominant player in specific markets within the online segments, Haypp Group has a certain level of leverage, especially against its smaller suppliers when it comes to negotiation and purchasing power.

When purchasing goods or services, Haypp Group has begun to implement sustainability factors, and supports others in doing so, provided that no discriminatory element is included. Product packaging is one such factor, for example, oral nicotine packaging is primarily made out of plastic and filled by our suppliers. Afterwards, the journey to the end consumer begins.



The goal of combating the climate crisis. As well as preparing for it, applies to all - irrelevant of size and carbon footprint.

- **Target 13.3** – Strengthen resilience and adapt capacity to climate-related hazards and natural disasters in all countries. We are assessing and will take proportional action to combat climate change.

16 PEACE, JUSTICE AND STRONG INSTITUTIONS



Haypp Group take the necessary steps to ensure that ethical business practices are maintained both within our own company and in our relationships with outside parties. Working with excised products and cross boarders brings additional risks which need to be handled.

- **Target 16.5** – Substantially reduce corruption and bribery in all their forms.

The Code of Conduct for all our employees, as well as the Supplier Code of Conduct, is very clear about the goal of combating the climate crisis, as well our stance on corruption and the handling of bribes.

17 PARTNERSHIPS FOR THE GOALS



By sharing Haypp Group's knowledge of both the tobacco and e-commerce industry, together with consumer insights on tobacco and nicotine use, we have the possibility to save millions of lives, reduce inequalities and improve public health globally.

- **Target 17.G** – Enhance the Global Partnership for Sustainable Development, through our multistakeholder partnerships that mobilise and share knowledge, expertise, technology and financial resources. This allows us to support the achievement of the Sustainable Development Goals in all countries, especially developing countries.

Policy and regulatory developments in countries across the globe should take into consideration the knowledge, expertise and experiences of other countries and regions. Here, Haypp Group has a responsibility to act and share their insights and research. This can help give us momentum to change course for more sustainable development on both a national and global level. The insights generated by Haypp Group are also valuable for product development and innovation in order to further meet both consumers' and society's expectations and needs.

- **Target 17.H** – Encourage and promote effective public, public-private and civil society partnerships, building on our experience and resourcing strategies.

Code of Conduct

Haypp Group’s Code of Conduct as well as its updated and first comprehensive Supplier Code of Conduct was implemented throughout 2021 and serves as the fundament for the values which Haypp Group and all its employees act by.

Code of Conduct

The initial development of the Code of Conduct started as way to create a policy that reflects what Haypp Group, and all of its employees, management and board members stand for and apply in yearly 2020. Not before long a more thorough and inclusive the Code of Conduct was in place which defines the standards of behaviour that are essential to Haypp Group and the ethical business principles that are applied. The Code of Conduct represents Haypp Group’s dedication to compliance with the law and commitment to ethical business practices.

THE CODE OF CONDUCT IS DIVIDED INTO THE FOLLOWING SECTIONS:

C.E.O. on C.o.C.	Intro to the code	Living by the code	We act ethical in line with our beliefs
We celebrate diversity & equality	We contribute to a workplace free from harassment	We promote a safe & healthy workplace	We avoid conflicts of interest
We communicate in an open, honest & responsible way	We protect trade secrets & confidential information	We reject bribery & inappropriate gifts	We keep accurate records & protect company assets
We follow the law	We play fair	We promote a happy, healthy life for consumers	We contribute to a happy planet
We contribute to a healthy society	Reporting breach of the code	Code acknowledgement	

The Code of Conduct has through 2021 been implemented with training and signing of the code by employees. All new employees receives information of and discuss the Code of Conduct as part of the onboarding process as well as the mandatory training managed as an e-learning.



ANTI-CORRUPTION

Haypp Group has assessed all its operations for risks related to corruption and did not identify any significant risks related to corruption. The anti-corruption policies and procedures have been communicated to the members of the board of directors, the management team and to all employees as well as suppliers of Haypp Group. The policies and procedures on anti-corruption is also communicated to authorities, municipalities, the relevant ministry as well as the Parliament committees on Civil Affairs and Industry and Trade.

Information on the anti-corruption procedures has been initiated as part of the onboarding information in 2021. Individuals which would have a higher risk of being exposed to situation where corruption could be present have also received training directly. The intention is to also initiate training on the topic of anti-corruption during 2022. Haypp Group has not had any incidents of bribery or corruption in 2021.

Supplier Code of Conduct

The Supplier Code of Conduct was updated in 2020 to its current level of commitment and implemented fully in 2021 for essential suppliers. All of Haypp Group's product suppliers must fulfil the Supplier Code of Conduct. All of Haypp Group's suppliers of oral nicotine products have either signed the Supplier Code of Conduct or have their own internal Code of Conducts setting out the same standards. The Supplier Code of Conduct focuses on (i) safe products, (ii) taxes and other fees, (iii) working environment and human rights, (iv) anti-bribery and corruption and (v) environmental and climate innovation.

SAFE PRODUCTS

All suppliers must guarantee that the oral nicotine products provided to Haypp Group comply with statutory requirements and industry regulations relating to production, content, packaging, labelling, warning texts and marketing.

TAXES AND OTHER FEES

All suppliers must comply with all tax and fee obligations from national legislation.

WORKING ENVIRONMENT AND HUMAN RIGHTS

All suppliers must guarantee that they do not violate, or contribute to the violation of human rights or labour rights. Product production must be comply with the ILO's eight fundamental conventions on human rights in working life.

ANTI-BRIBERY AND CORRUPTION

Haypp Group has zero tolerance against bribery and corruption. All suppliers must comply with relevant laws and regulation applicable in markets in which the business is conducted, e.g. anti-bribery legislation in Sweden, the UK and the United States.

ENVIRONMENTAL AND CLIMATE INNOVATION

Haypp Group is actively trying to contribute to the global environment in a positive way. Haypp Group brings consumer and market insights to the table when engaging in product development with partners and encourage all sustainable and climate innovative initiatives from partners. Such initiatives can create a more sustainable range of products and services.

Service Provider Code of Conduct

In parallel to the Supplier Code of Conduct, which covers the essential suppliers of oral nicotine products, Haypp Group have in 2021 also initiated a broader Service Provider Code of Conduct to be aimed as ensuring also other suppliers of value are acting in line with Haypp Groups values.

This Service Provider Code of Conduct will be implemented through 2022 and aimed at those service providers where Haypp Group have the largest monetary values, hence those we purchase the most from. Potentially the Service Provider Code of Conduct will in later stage be placed under the existing Supplier Code of Conduct.

Sustainability data & results

Environmental topics

Materials

Haypp Group encourages both its partners and employees to reduce the use of non-renewable material, as well as whenever possible choose renewable material in operation.

The main material which Haypp Group purchase and handles are packaging material for order sent out from our warehouse. For the main warehouse, located in Sweden, it was purchased e-commerce bags out of recycled plastic (371 kg). It was also purchased renewable paper bags (3 105kg) which is meant to in large replace the previously used e-commerce bags. The main material used in operations is the corrugated cardboard (154 126 kg) whereof 82 per cent is shipped to customers and the remaining volume (28 451 kg) is cardboard used in the logistics and supply-chain with transporters. Comparison with previous year is unfortunately not possible due to distorted data from 2020.

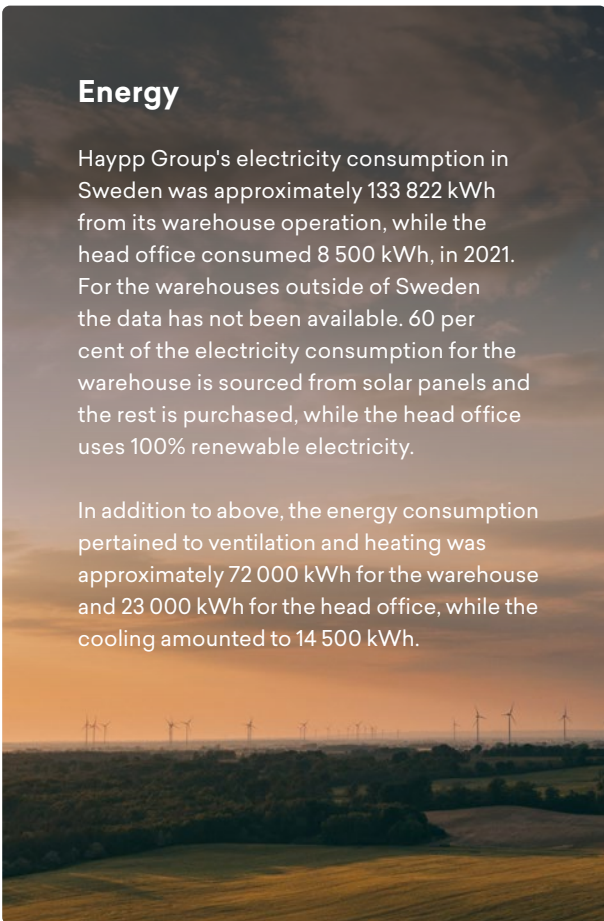
The labeling used for orders have been changed for fully recycled FSC certified paper, which is in place as of 2022, and consisted of 9 570 kg for operations in Sweden.

The waste collection of mainly paper, wood and plastics from the Sweden warehouse has had an emission saving of 42 600 kg CO₂.

Energy

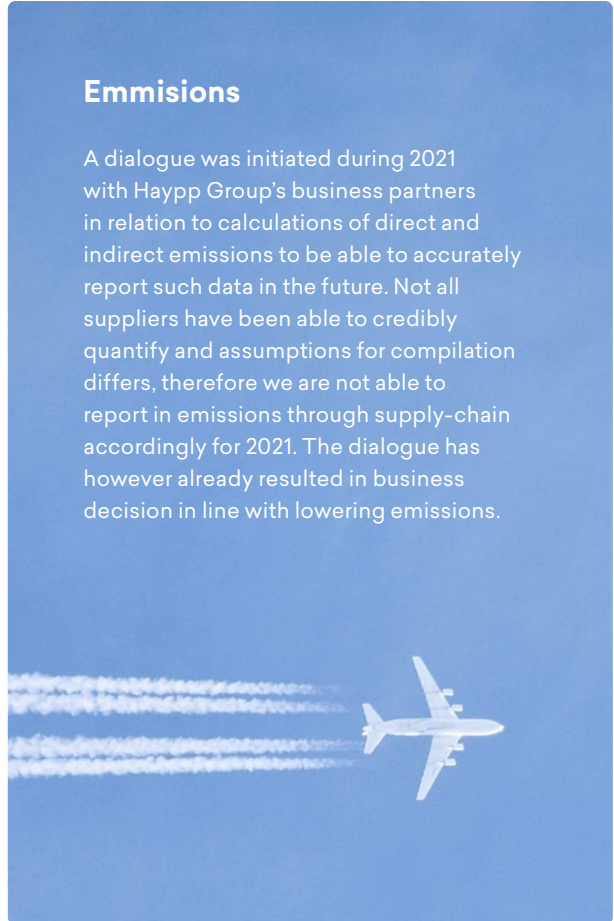
Haypp Group's electricity consumption in Sweden was approximately 133 822 kWh from its warehouse operation, while the head office consumed 8 500 kWh, in 2021. For the warehouses outside of Sweden the data has not been available. 60 per cent of the electricity consumption for the warehouse is sourced from solar panels and the rest is purchased, while the head office uses 100% renewable electricity.

In addition to above, the energy consumption pertained to ventilation and heating was approximately 72 000 kWh for the warehouse and 23 000 kWh for the head office, while the cooling amounted to 14 500 kWh.



Emmisions

A dialogue was initiated during 2021 with Haypp Group's business partners in relation to calculations of direct and indirect emissions to be able to accurately report such data in the future. Not all suppliers have been able to credibly quantify and assumptions for compilation differs, therefore we are not able to report in emissions through supply-chain accordingly for 2021. The dialogue has however already resulted in business decision in line with lowering emissions.





Effluents and waste

Waste is generated both upstream and downstream in the value chain in which Haypp Group is active. Upstream is pertains to waste generated in the manufacturing process and transport of the goods to Haypp Group's warehouses. Downstream, waste is generated from the packaging used in shipment of customers' orders. Haypp Group is actively working with its business partners to reduce waste in the value chain and use recycled and biodegradable packaging.

In early 2021 the new suppliers for waste collection from the head office in Stockholm took started. The collection includes separation at source of different types of paper and packaging, plastic, glass, combustible waste, and other forms of waste. The waste collection resulted in an emission saving of 4 832 kg CO₂. Aluminum capsules used in the office are collected by and recycled through our supplier.

Supplier environmental assessment

All suppliers must fulfil the environmental aspects of the Supplier Code of Conduct.

Social topics

Employment (Number in parentheses is the previous year)

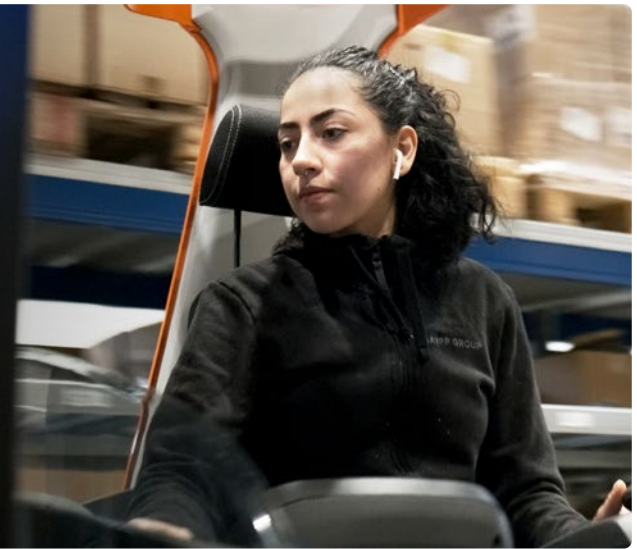
Haypp Group welcomed 47 (53) new employees in 2021 and had an employee turnover of 28 (8) people. In this are full-time contracted consultants included. The new employees are divided into the following age groups: (i) 20 (28) people under 30 years old, (ii) 25 (23) people between 30 and 50 years old and (iii) 2 (2) people over 50 years old. Divided by gender, 17 (24) are female and 30 (29) are male. Of the 28 (8) people that left Haypp Group, 19 (5) were male and 9 (3) were female, of which 9 (2) were under 30 years old and 18 (6) people in between 30 and 50 years old, one (0) person was over 50 years of age. Haypp Group does not apply any collective bargaining agreements.

Haypp Group provides benefits such as insurance coverage for health care, disability and invalidity coverage and offers benefits as retirement provision and stock ownership. Benefits for part-time employees are provided in correspondence to the per centage of work they performed, e.g. employment equal to 25 per cent of a full-time employment receives 25 per cent of the benefit values, however health insurance coverage is full. All Swedish citizens are entitled to parental leave. 15 (12) employees took parental leave, of which 10 (11) were men and 5 (1) women, during 2021.

Occupational health and safety

Haypp Group did not have a reporting system for occupational health and safety management but all employees are covered by such a system. There are more safety routines and procedures for warehouse staff than for staff working from the head office.

Training is provided to all employees on occupational health and safety routines, particular training applies for warehouse staff.



Training and education

Haypp Group does not document the average hours of training per employee nor programs to upgrade employee skills and transition assistance programs. Haypp Group encourages all employees to partake in training in relation to upgrade employee skills which is made in dialogue with respective manager. All employees have annual mid-year and end-of-year reviews relating to performance and career development. Managers are encouraged to focus on coaching respective team members.

Diversity and equal opportunity

Of the persons making up our Board of Directors, 33 per cent are female (14) and 67 per cent are male (86). 50 per cent are between 30 and 50 years old (71) and 50 per cent are above 50 years old (29).

Considering all employees, 35 per cent are female (40), and 65 per cent are male (60). 29 per cent of all employees are under 30 years old (37), 66 per cent are between 30 and 50 years old (58) and almost 5 per cent are over 50 years old (5).

Haypp Group do salary comparison between roles for its Swedish employees. Roles are divided into eight categories to be evaluated with comparable positions and responsibilities. In the first two categories, as well as the two highest, the differences are none or slim. If anything, the salary would be slightly higher for female than male employees. However, the four categories in the middle, where the greater part of all employees are included, there is a male favour of between 10-19 per cent between in terms of salary. Haypp Group take this matter very serious. In terms of other remuneration there are no significant differences recorded between similar role and responsibility.

Anti-corruption

A vital part of the Code of Conduct is the opposition towards any form of bribery or corruption. Employees are urged to report any suspicions of incidents related to corruption. During 2021 no such incidents have been reported.

Customer privacy

Haypp Group has not received any complaints relating to breaches of customer privacy, nor identified any leaks. There has been one case, which Haypp Group reported to authorities, where a computer and an iPad was reported as lost or potentially a theft, which could have resulted in loss of customer data.

Social supplier assessment

All suppliers must adhere to our Supplier Code of Conduct which, inter alia, states that human rights and the ILO conventions must be respected. Haypp Group has not identified any negative social impacts among its suppliers in 2021.

Human rights assessment

All operations have been subject to human rights reviews as a part of the work to develop the Code of Conduct. The employees have through 2021 been given training in the form of e-learning on the Code of Conduct as well as being part of each manager's responsibility to cover. All new employees are set to have training on human rights as a part of the training of the Code of Conduct as they join, including full-time consultant. All essential business partners must adhere to the Supplier Code of Conduct which, inter alia, specifies that human rights must be respected.



Non-discrimination

No incidents of discrimination have been reported.

Marketing and labeling

There are strict laws and regulations relating to the marketing and labeling of tobacco products. In relation to oral nicotine products, there are no laws and regulations why the industry has decided to still follow the strict requirements relating to content, safe use and how the product's packaging shall be disposed of in an environmentally friendly manner. Haypp Group has not had any incidents of non-compliance with regulations or voluntary codes relating to information and labeling.

In 2020, the Swedish Consumer Ombudsman initiated court proceedings against one of Haypp Group's subsidiaries, Snusbolaget Norden AB, claiming that Snusbolaget Norden AB had used market communication that were not compliant with Swedish marketing rules for tobacco products. The Patent and Market Court made its ruling in 2021 which gave both the Swedish Consumer Ombudsman and Snusbolaget Norden AB right on different topics. As a result Haypp Group have made adjustments and market practices is somewhat clearer.

Customer health and safety

Customer health and safety is at the core of Haypp Group. Providing our customers with healthier product alternatives is our core business. All our oral tobacco products must fulfill the legal requirements and in the absence of regulation on oral nicotine products Haypp Group initiated the testing of all oral nicotine products setting an industry standard to ensure that the products sold on the platforms are safe. If the products are not safe, Haypp Group will not sell it.



Materiality analysis and risk assessment

MATERIAL TOPIC	MATERIALITY	RISK (AND/OR OPPORTUNITY)	MANAGEMENT	STRATEGIC FOCUS FOR HAYPP GROUP
ECONOMIC TOPICS				
GRI 205: Anti-corruption	Anti-corruption is an important question globally, even though our industry has not been particularly exposed. No market play cannot be overly confident and as our business grows it is reasonable to expect that the risk could increase.	Corruption is a business risk wherever it exists. It is a risk in relation to business relations and our reputation.	We have a Code of Conduct that all employees have to read and sign as well as participate in e-learning training on the Code. We also have a whistle blower system in place to identify all kinds of irregularities.	<i>Business Ethics</i>
ENVIRONMENTAL TOPICS				
GRI 301: Materials	Haypp Group is working to be effective when it comes to all types of resources. We try to be energy efficient reduce waste in every way we can. Being an e-commerce business, we do this to reduce our negative impact on the environment in our operations and encourage our suppliers to do the same. The work includes waste, use of recycled materials, energy efficiency, effective packaging, logistics and more.	Associated risks are increased costs for some materials. Identified a possibility to be at the forefront which could signify a better relationship with both suppliers and customers.	We strive to increase the use of recycled and renewable material in our packaging and evaluate incentives to reduce the waste in relation to all our markets.	<i>Innovation for Sustainable Growth</i>
GRI 302: Energy	Haypp Group, as the rest of the world, is dependent on energy. We consider it natural to do our best to contribute to smart energy consumption.	Increased energy costs.	We seize all opportunities to reduce our energy consumption and choose green energy from trusted suppliers when we have the possibility to impact the decision.	<i>Innovation for Sustainable Growth</i>
GRI 305: Emissions	The world needs to become climate neutral. This goal is important for us, and we know that it is important for our customers and partners and we want to contribute. All must contribute. As an e-commerce business, our initial task is to see how we can impact the transport of our products to our customers.	Increased costs of emissions in the future can create new costs for the business	We try to choose suppliers that will decrease the emissions in our value chain. We do also encourage other suppliers to take actions with the aim to reduce emissions from e.g., transports.	<i>Innovation for Sustainable Growth</i>

<p>GRI 306: Waste</p>	<p>To us waste is mostly connected to packaging, both primary and secondary packaging of the products. The development of packaging design is fast, and this contributes to the industry becoming more resource efficient, and contributing to the reduction of hazardous materials in the environment and optimizing transport. Haypp Group wants to contribute by setting good examples where ever we can to challenge the industry. For the environment, for our customers and for the company's success.</p>	<p>Badwill and increased costs for shipment of waste. There is an opportunity to contribute to solving the problems that can increase our brand's attractiveness as a responsible market player.</p>	<p>The packaging creates waste at customer level that should be recycled, and the portion bags as well as cans are sometimes thrown on the streets creating a problem for all. These are issues we contribute to solve. We are contemplating the best manner to increase recycling and separation at source besides that we require that of our suppliers and encourage our customers to do the right thing. Haypp has continuously worked towards removing all black plastics in products and logistics as black plastic is more difficult to recycle. We have also used our influence to increase the use of plastics from corn and other alternatives that are more environmentally friendly than ordinary plastic.</p>	<p><i>Innovation for Sustainable Growth</i></p>
<p>GRI 308: Supplier Environmental Assessment</p>	<p>Haypp Group is working to be effective when it comes to all types of resources. We try to be energy efficient reduce waste in every way we can. Being an e-commerce business, we do this to reduce our negative impact on the environment in our operations and urge and encourage our suppliers to do the same.</p>	<p>Risk that our suppliers do not live up to what Haypp promises its customers.</p>	<p>Communication of Haypp Group's Code of conduct, dialogue, and testing.</p>	<p><i>Innovation for Sustainable Growth</i></p>

SOCIAL TOPICS

<p>GRI 401: Employment</p>	<p>A success factor for us at Haypp Group is the engagement and skills of the employees. Personal development is increasingly important for them, and for the company. We know that Haypp Groups develops when our employees reach new levels in their own personal development. People who are involved in Haypp Group's operations and development should know the long-term ambitions of the business. There shall be opportunities for all and clear that efforts to improve leadership, sustainability, innovation, and other skills is recognized and appreciated.</p>	<p>Identified risks are increase turnover among employees, increased costs for recruitment and a lower degree of innovation and key people deciding to leave the company. Opportunities relating to lower costs, increased innovation, and a better organisation.</p>	<p>Active dialogue with employees and whistle blower function are essential to ensure that Haypp continues to be a fantastic place to work. A focus on creating a beneficial culture is key.</p>	<p><i>Best place to work</i></p>
<p>GRI 403: Occupational Health and Safety</p>	<p>Safety is a must for Haypp Group as we put a lot of emphasis on our employees, and everyone must feel safe.</p>	<p>Risk of occupational fatigue, especially during the Covid-19 pandemic when many work from home. As employees return to office there is a need to reinforce a healthy working place.</p>	<p>Whistle blower function in place where employees can report issues.</p>	<p><i>Best place to work</i></p>

<p>GRI 404: Training and Education</p>	<p>To be a market player at the forefront, Haypp Group is dependent on employees be able to continuously develop.</p>	<p>Lower satisfaction level among employees</p>	<p>Haypp Group has individual development plans for each employee.</p>	<p><i>Best place to work</i></p>
<p>GRI 405: Diversity and Equal Opportunity</p>	<p>Diversity matters. It is important to our wellbeing and success. We are conscious about how much value equality and diversity adds to our business. Questions relating to salary, career opportunities, parental leave and to prevent discrimination are essential. To have a diversified workplace is to affirm opportunities, which includes a good workplace environment for today's and tomorrow's talents.</p>	<p>Lower degree of innovation and lower satisfaction levels and people choosing to leave Haypp Group are identified risks.</p>	<p>Active work with dialogue with employees and strive for equality and diversity when recruiting employees and managers.</p>	<p><i>Best place to work</i></p>
<p>GRI 406: Non-discrimination</p>	<p>Please refer to Diversity and Equal Opportunity</p>	<p>Please refer to Diversity and Equal Opportunity</p>	<p>Please refer to Diversity and Equal Opportunity</p>	<p><i>Best place to work</i></p>
<p>GRI 412: Human Rights Assessment</p>	<p>Human rights are an important topic which Haypp Group supports in any manner possible. It is important that all the products we sell are manufactured in a manner that respects human rights.</p>	<p>Haypp Group has a limited risk exposure to risks related to human rights, but our biggest suppliers have a bigger risk exposure why it is important for us to avoid any negative impact.</p>	<p>Please refer to Supplier Social Assessment</p>	<p><i>Business Ethics</i></p>
<p>GRI 414: Supplier Social Assessment</p>	<p>Human rights and other social issues are important to Haypp Group. We priorities this and have high ambitions for our value chain. We have some tobacco products and nicotine that are manufactured from organic tobacco. Therefore, it is important to include requirements on our suppliers relating to social responsibility.</p>	<p>The identified risks relate to Haypp Group not being able to influence or control our suppliers as we are a relatively small customer.</p>	<p>The requirements on suppliers are set in our Supplier Code of Conduct. The Code is communicated and discussed with our largest suppliers. Controls are carried out where appropriate.</p>	<p><i>Business Ethics</i></p>
<p>GRI 416: Customer Health and Safety</p>	<p>Consumer health is a matter of concern for all industry players who manufacture or supply products in daily commodity trade, especially products containing chemicals or additives. For Haypp Group, working with consumer health means, respecting and enforcing age restrictions, being transparent with product information, labelling of the products so that consumers can make informed choices. In addition, Haypp Group offers non-nicotine alternatives for customers that wish to reduce their nicotine use or to quit altogether. We support and encourage initiatives that promote healthy user habits including sports and other activities that contribute to a healthy and balanced life. This is in line with the expectations from our stakeholders and our own values.</p>	<p>Our business is dependent on us being on our customer's side and support them. There is an opportunity as no other market player so clearly has taken the customer's side with the goal of risk reduction perspective for tobacco and contribute to positive health effects on a global scale in line with the UN sustainability goals.</p>	<p>Continuous product development, labs for testing of products and studies to acquire knowledge about the positive effects of oral nicotine, requirements set for suppliers, communication, and information to increase knowledge.</p>	<p><i>Health contribution</i></p>

GRI 417: Marketing and Labeling	We aim to provide stellar service and information about our products and their impact on health, environment, and society.	If not provided, there is a risk of badwill and lawsuits.	Continuously monitoring developments to ensure compliance	<i>Insights for All</i>
GRI 418: Customer Privacy	GDPR is a requirement in our business as we handle millions of purchases made by consumers each year. As Haypp is proud of our knowledge about the market and customers through different studies, it is important to respect people's integrity. If not, customers would not feel comfortable to share experience and knowledge. The integrity of the customer is crucial to maintain a good customer relation.	If we would not uphold the integrity of our customers, it would not be possible for Haypp to provide insights and that part of our business. the value of our brand and reputation should not remain as high.	We ensure to monitor developments and wants to be an active player	<i>Insights for All</i>

HAYPP GROUP SPECIFIC ASSESSMENT

Plastic	Plastic is an important topic both in relation to the environment and sustainable consumption, two important topics for Haypp Group. Haypp Group has chosen to highlight plastic as a separate category to be able to focus on plastic particularly. Considerations relating to plastic is important and given a sustainability perspective on the different levels of the production. It pertains to the strive to optimise the amount of plastic used in packaging, a better storage of the products but also an overall less use of plastic. Haypp Group encourages recycling and properly used and recycled, plastic is a good packaging material that we and our consumers appreciate.	The impact of plastic on the environment is material and our products can easily be identified if thrown on the streets which can lead to badwill.	Continuous information encouraging customers to recycle and discard of used products in the right manner.	<i>Innovation for Sustainable Growth</i>
Addiction	Nicotine addiction is a globally discussed question. The question comes up in Haypp's dialogue with the market and customers why it is very important to handle the question with respect. Addiction related to nicotine is present in all our development dialogues both internally and externally and must be handled correctly in relation to our business.	Risks relate to ignorance and unwillingness about the effect from tobacco free nicotine products as a substitute for tobacco products. A risk that Haypp monitors is the risk for young people to use our products as a gateway to tobacco products which is contrary to Haypp Group's business values.	Haypp Group is aware of the worry surrounding the use of nicotine and its effects. We are trying to provide the best available information and continuously work towards marketing, growth and the use of our products are not related to the unhealthy tobacco market, i.e. the use of our products shall save lives. The nicotine level in the products sold are carefully checked, we have a lab that tests the products to ensure that the products are safe. Even though we know that nicotine products are addictive, it is also a possibility for a mitigated risk for millions of smokers around the world.	<i>Health contribution</i>

Statutory Sustainability Report

	ENVIRONMENT	SOCIAL CONDITIONS AND STAFF	HUMAN RIGHTS	ANTI-CORRUPTION
POLICY	<p>Haypp Group has the ambition to be a drive for change in the industry where sustainability is at the core of our business model. In 2020, Haypp Group kick-started its broader sustainability focus, a workstream that continued during 2021 including the sustainability policies and procedures. The work is continuous as further areas and initiatives arises as we learn more.</p> <p>Please also refer to "Code of Conduct" and "Supplier Code of Conduct".</p>	<p>Haypp Group's Code of Conduct and Personnel policy ensure positive social conditions in terms of working environment and our responsibility as an employer. Haypp Group also has a Supplier Code of Conduct to ensure the ILO conventions are respected.</p> <p>Please also refer to "Code of Conduct" and "Supplier Code of Conduct".</p>	<p>Haypp Group's Code of Conduct as well as its Supplier Code of Conduct contain requirements to respect human rights. The Supplier Code of Conduct was updated and implemented during 2020. As of 2021 all essential suppliers of product have signed.</p> <p>Please refer to "Code of Conduct" and "Supplier Code of Conduct".</p>	<p>Haypp Group has zero-tolerance towards all forms of corruption, bribes, inappropriate gifts or other personal benefits. This statement is communicated in the Code of Conduct. Further policies and training related to anti-corruption have been initiated during 2021 and will continue to be implemented in 2022.</p> <p>Please refer to "Code of Conduct" and "Supplier Code of Conduct".</p>
RESULT OF POLICY	<p>It is a continuous work to decrease the environmental impact. Haypp Group works together with its stakeholders to achieve this goal and strive to always improve and be better.</p> <p>Please refer to "Materiality analysis and risk assessment".</p>	<p>Haypp Group wants to be a great place to work for its employees and a trusted and valued partner in its relations with suppliers and other business partners.</p> <p>Please refer to "Materiality analysis and risk assessment"</p>	<p>In 2021, Haypp Group expanded and depend the conversations with the suppliers related to the Code of Conduct and conducting due diligence in order to gain more control of the supply chain and related risks. Suppliers has been asked to share assessments how they validate human rights are upheld.</p> <p>Please refer to "Materiality analysis and risk assessment".</p>	<p>Our work relating to anti-corruption and bribery is guided by our Code of Conduct.</p> <p>Please refer to "Materiality analysis and risk assessment". Please refer to "Sustainability data & results", "Scorecard" and "A sustainable business model; Business ethics".</p>
PERFORMANCE INDICATOR	<p>Please refer to "Sustainability data & results", "Scorecard" and "A sustainable business model; Sustainable innovation for growth and development".</p>	<p>Please refer to "Sustainability data & results", "Scorecard" and "A sustainable business model; The best place to work".</p>	<p>Please refer to "Sustainability data & results", "Scorecard" and "A sustainable business model; Business ethics".</p>	<p>Please refer to "Sustainability data & results", "Scorecard", "Code of Conduct" and "A sustainable business model; Business ethics".</p>



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Signatures from the Board of Directors

Stockholm, date as stated by electronic signatures

Ingrid Jonasson Blank
Chairman

Per Sjödel
Board member

Anneli Lindblom
Board member

Kristian Ford
Board member

Linus Liljegren
Board member

Patrik Rees
Board member

Gavin O'Dowd
CEO



Auditor's report



Revisorns yttrande avseende den lagstadgade hållbarhetsrapporten

Till bolagsstämman i Haypp Group AB (publ), org.nr 559075-6797

Uppdrag och ansvarsfördelning

Det är styrelsen som har ansvaret för hållbarhetsrapporten för år 2021 och för att den är upprättad i enlighet med årsredovisningslagen.

Granskningens inriktning och omfattning

Vår granskning har skett enligt FARs rekommendation RevR 12 *Revisorns yttrande om den lagstadgade hållbarhetsrapporten*. Detta innebär att vår granskning av hållbarhetsrapporten har en annan inriktning och en väsentligt mindre omfattning jämfört med den inriktning och omfattning som en revision enligt International Standards on Auditing och god revisionssed i Sverige har. Vi anser att denna granskning ger oss tillräcklig grund för vårt uttalande.

Uttalande

En hållbarhetsrapport har upprättats.

Stockholm, den dag som framgår av vår elektroniska signatur

Öhrlings PricewaterhouseCoopers AB

Magnus Lagerberg
Auktoriserad revisor

