

HOME GROUP Code of Conduct

Approved by: Lorraine McMahon, Group President

Date: 01.06.2021

HOME GROUP Code of Conduct

The way we deal with our business partners and how we act internally shall be characterized by honesty, respect, fairness and integrity. We shall always comply with the laws and regulations in all jurisdictions where we do business. We shall not offer or accept from customers and other business partners, official institutions, or representatives of such entities, any rewards or benefits that violate any applicable laws or this Code. We will ensure that our employees and our business partners (suppliers, customers, and sub-contractors, etc.), are aware of our Code.

Zero tolerance for corruption

Trust, respect, integrity and honesty are essential to Home Group. Any type of corruption is contradictory to the objective of doing good business. We have zero tolerance towards corruption in any form.

Dealing with officials

When dealing with officials, we need to always act in a professional way, solving daily business issues in a legal and ethical way.

Conflicts of interest

We shall always make business decisions based on what is in the best interest of the Group. Decisions shall never be based on personal considerations or relationships. A conflict of interest arises when anything interferes with or influences the exercise of a co-worker's independent judgment in the best interest of Home Group. We must avoid situations in which our personal interest may conflict with, or even appear to conflict with, the interest of the Group.

Respectful relationship at work

Home Group is committed to creating a safe and respectful work environment in which our colleagues can grow and perform at their best. We protect our colleagues from discrimination and harassment. We make all employment-related decisions (such as hiring, promotion, salary changes) based only on the evaluation of an individual's qualification, competencies, and achievements. Discrimination because of gender, sexuality, national origin, race, religion, disability, age, marital status, or any other legally protected characteristics is strictly prohibited. Similarly, we do not tolerate harassment at work, meaning that Home Group leaders especially and all other Home Group employees are not allowed to display any sort of verbal, visual or physical behavior with the aim to intimidate, abuse, or harass.

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Raising questions and concerns

Raising questions and concerns can help Home Group identify and solve a problem at an early stage. If you have doubts or concerns about compliance with this Code in any aspect of our business, we encourage you to contact any of the following resources as soon as possible:

- Talk to your direct Manager, your local Factory Manager, or any human resources professional.
- Send an e-mail via compliance@homegroup Holdings.com describing the issue in your language. If needed your message will be translated into the English language for investigation by the Group Compliance Office.
- Send an anonymous message to the Home Group Compliance Office. To do that, you need to visit the Home Group global website www.homegroup Holdings.com on the Code of Conduct page. Use the message box "Report to Compliance Office" and describe the issue. You can identify yourself and leave contact details, or you can stay anonymous.

The Home Group Compliance Office consist of colleagues from the Group Management Team only. Experts from Home Group locations can be involved when needed. We will ensure that the investigation will not harm the employee who reported about the problem in any way.

Situations we must be aware of

Assessing whether there is a conflict of interest is sometimes difficult. In case of doubt, always be transparent and ask your manager. If a clear conflict of interest as described below arises, it must be reported immediately to your manager. The following are some types of situations that we have to be particularly aware of.

Business opportunities

None of us may take business opportunities for ourselves, which may arise during the course of our duties for Home Group. Nor may any of us use company property or information for any type of personal gain. If in doubt, always ask your manager.

Example: you are responsible for transport management. Other employee family which is your good colleague or who you are cooperating with on a daily basis, has transport company which works for Home Group. There is conflict of interest as you can treat them in preferential way versus other transport companies.

Other employment

Any employment outside of Home Group, with or without compensation, must not influence a co-worker's job performance. We may not engage in outside business interests that divert time and attention away from our personal work responsibilities or require work during company time.

Example: Your family is running grocery. You are engaged in articles supplies to this store including fresh food which you can get between 3 and 5 am. During the day you need be in constant phone contact to arrange articles replenishment. This requires your attention and do not let you focus on your work duties.

Gifts, benefits, reimbursements

Whatever gifts you are receiving, provided they cannot influence your decisions, should be accepted on behalf of the company. Such gifts are expected to be forwarded to factory manager for further considerations.

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Cash payment gifts and others like personal loans or guarantees of such obligations, whether of large or small amounts, could be regarded as bribes and may not be accepted under any circumstances. Offers of this nature must be politely, but firmly declined or immediately returned to the sender if delivered without prior notice and to be reported to your manager. This also applies to any situation that could affect, or appear to affect, the professional judgment in the performance of the respective work or duties for the company or a third party. If you are in doubt, always ask your manager.

Example: You have two suppliers with the same pricing level. One Supplier visited you before Christmas and left small package. When you opened it, you see expensive watch. Next time you can treat them preferential as another supplier didn't give you any gift, even if there is better service and quality for Home Group.

Bribes, kickbacks and similar

We may not, directly or indirectly, demand or accept, offer or give any kind of bribe, kickback, unauthorized loan or any other unlawful or unethical benefit when conducting business for Home Group.

Example: Driver that delivered materials to factory offers you money for accepting less quantity than on documents. This would lead to loss for Home Group.

Personal relationships

All of us working at Home Group must be observant to any conflict of interest if there is a family member, relative, or close friend involved. This is applicable within the Group as well as other business relations.

Example: Let's say you have an employee, Jan, who is in charge of hiring new employees on your behalf. Jan's nephew applies for a position. Because Jan is the head of hiring, this would be a conflict of interest. She could choose to hire her nephew because he is family instead of another qualified candidate.