H&M Group

Whistleblowing

H&M is providing its employees with a reporting channel, whistleblowing@hm.com, which should be used to report serious improprieties within the company, for example accountancy crimes or bribery crimes.

H&M is committed to the highest possible standards of openness, integrity and accountability. We take every effort to avoid any improprieties that may result in serious consequences for the company or its employees. However, despite all these efforts malpractice in any part of the business may occur.

One of our core values is “Being Straightforward”. Thus, we have an Open Door Policy that grants all employees the opportunity to openly discuss any work-related issue directly with their managers. If for any reason, discussing with the manager would not be possible, employees can contact their designated HR contact person or senior manager.

In case of very serious malpractice or misconduct all employees are able to use the Whistleblowing Procedure.

Purpose

The purpose of the Whistleblowing Policy and Procedure is to encourage employees to disclose any serious malpractice or misconduct of which they become aware.

With the Whistleblowing Policy H&M undertakes to act in accordance with legislation on disclosure of malpractice in the workplace as well as in accordance with the Swedish Personal Data Act (1998:204) on personal data protection.

Authority for Whistleblowing Policy

Overall authority for this policy sits with the Head of Security. Managers are responsible for ensuring that all employees are aware of this policy and are able to raise concerns in accordance with the procedure below without fear of reprisals.

All employees are responsible for the success of this policy and should ensure that they take steps to disclose any serious malpractice (under this policy) of which they become aware.

Scope

This policy applies to all employees within the H&M Group. The policy refers to malpractice concerning:

1. Accounting
2. Internal accounting controls
3. Auditing matters
4. Fight against bribery
5. Banking- and financial crime
6. Other serious improprieties concerning the company’s or the group’s vital interests or the life or health of individual persons, as for instance serious environmental crimes, major deficiencies as regards the security at the place of work and very serious forms of discrimination or harassments.

Further reporting of malpractice through whistleblowing may only refer to persons in key positions and be of such seriousness that it could jeopardize the whole company or group.

Procedure for Raising a Concern

Any employee that suspects serious improprieties that may result in serious consequences for the company performed by persons in key position of the company (for example members of the board, head office management or country management) are encouraged to raise a concern.

If no other internal report or information channel can be used, for instance if the reported person is part of the management and the suspected improprieties for that reason otherwise run the risk of not being properly handled, any employee can use H&M’s official whistleblowing channel: whistleblowing@hm.com.

The system is a complement to normal internal administration and voluntary to use.

If you are uncertain whether you should use the whistleblowing channel or not or have any other question regarding whistleblowing please direct your requires to whistleblowing@hm.com.

All reports will be handled by the Head of Security.

Confidentiality

H&M will not disclose the identity of the person who makes a report to any internal or external part. The identity of the person is only known by the Head of Security and disclosed to the state authorities only when investigation so requires.

H&M is also liable at the request of the data subject to rectify personal data that is incorrect, incomplete or misleading.

Any employee has the right to request an excerpt of the register to check which information if any is registered about him or her. The information will however not be disclosed if it could jeopardize the investigation but should be released as soon as action is taken against the person concerned.

Corrective Action and Compliance

As part of handling and investigating disclosures any needed changes to routines and procedures to prevent malpractice in the future are recommended to Head of Security. The Head of Security is responsible for reviewing and implementing these recommendations.
False Disclosures

H&M will treat all disclosures of malpractice seriously. However, appropriate disciplinary action will be taken against any employee who is found to have made a disclosure maliciously that they know to be untrue, or without reasonable grounds for believing that the information supplied was accurate.