Ework Group Code of Conduct

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1. CEO Statement

At Ework Group, our purpose is bigger than providing world-class talent solutions. It is about how we choose to operate – with integrity, transparency, and respect guiding every decision we make. Our Code of Conduct is the foundation for that commitment. It clarifies what we stand for and how we expect to show up for each other as colleagues, as well as for our clients, our partners, and for the professionals who trust us with their careers.

For more than 25 years, Ework Group has built its reputation on strong ethics and a long-term perspective. These principles remain essential as we continue to grow across Europe and support organizations with their evolving workforce needs. Today, March 2026, our network includes over 240,000 professionals and more than 35,000 consulting partners, and we have around 10,000 professionals on assignment at any given time. Every interaction in this ecosystem contributes to the trust we have earned – and the trust we must continue to deserve.

Our Code of Conduct is rooted in the values that define us: **consultative, committed, collaborative, and curious**. These values reflect how we work and who we aspire to be – a company that acts responsibly, embraces diversity, strives for excellence, and learns continuously. They are also central to how we shape the future of our business: by simplifying how we operate, strengthening our client focus, and elevating the professionalism of our commercial efforts. Living our values is how we turn these ambitions into real, lasting impact.

We also recognize that our responsibility extends beyond our daily operations. A diverse, inclusive, and sustainable workforce is not just good business – it is the right thing to do. Through our Sustainability Board and our quality and environmental initiatives, we continue to raise our standards and set clearer expectations for ourselves and our partners. Achievements such as our EcoVadis Bronze Medal (2025), ISO 14001-, 9001-, and 27001 certifications, and recognition on Allbright's Green List (2025) are testaments to what we are making together – and the importance of staying committed.

As you read and reflect on this Code of Conduct, I want to emphasize one thing: **our culture is shaped by the everyday decisions we make, and the behaviors each of us demonstrates.** The integrity of Ework Group is built through these behaviors: how you collaborate, how you lead, how you solve problems, and how you represent our company internally and externally. When we follow these principles consistently, we strengthen our organization, our client relationships, and the markets in which we operate.

Thank you for your dedication to upholding our standards and contributing to a workplace where people feel respected, trusted, and proud to belong. Together, we will continue to shape a company that stands for ethical business, inspires confidence, and delivers value to clients, partners and professionals, and communities across Europe.

With appreciation,

Daniel Almgren
CEO, Ework Group

2. The Ework Group way

Our vision

Our vision is a society where talents thrive and amplify success. We contribute through creating successful collaborations, matching our clients' assignments with talents that have the necessary skill sets and knowledge.

Our values

We run our operations based on our four core values: Consultative, Committed, Collaborative and Curious. These values are the foundation of our company culture and form the basis of our Code of Conduct, along with external regulations such as laws, general guidelines, and our company governance, policies and standards. Our vision and values form a framework enabling us to always focus on the clients and work with a long-term perspective in our customer relationships and our business.

Consultative
We lead the way and apply best practices to optimize performance

Committed –
We drive success together and leverage our collective knowledge to stay ahead

Collaborative –
We learn and create together and act responsibly to deliver sustainable value

Curious –
We embrace change and acknowledge different perspectives to shape our future

3. Our responsibility as a member of society

We act responsibly and ethically

Ework Group's reputation is dependent on maintaining a high ethical standard throughout the Group. These standards are set for a careful management of the company's resources. Good business ethics involves exercising good judgement in business relationships and a commitment to preventing ethical risks and deterring corruption and bribery. Ework Group's operations must always be conducted ethically and with integrity. It is fundamental that our employees act in compliance with external and internal regulations and with Ework Group's values.

Our role in society is to positively contribute to the UN's Sustainable Development goals. We are also focused on promoting a more sustainable development of society and solutions to identified societal challenges. For us, sustainable business involves conducting business in a responsible manner and contributing to sustainable value creation.

Human Rights

Human rights must be respected in all our business areas and processes. Regardless of where we conduct our business, we will establish processes that enable us to identify, prevent and counteract potential negative impacts on human rights that we may cause or contribute through our business. If

we find that we have caused or contributed to negative effects, we will strive to solve them. Before we make any significant changes in our business, we will investigate and, if so, how the change can contribute to a negative impact on human rights. In adverse effects, we will have a dialogue on how to prevent or mitigate such effects.

We do not accept any form of discrimination, child labor or forced labor. Human rights include the provision of a healthy and safe workplace without any kind of harassment. As an employer, we will actively pursue diversity, gender equality, and respect our employees' right to freedom of association. Ework Group follows local labor laws and regulations and values a strong cooperation with unions and employee representatives. We provide equal employment opportunities (EEO) to all employees and external applicants for employment without regard to race, color, religion, sex, national origin, age, disability or genetics.

We are firm believers in embracing our differences and similarities, and for all employees and external applicants to feel included and welcome in Ework Group on equal terms.

Environmental protection

Ework Group is committed to the principles of environmental stewardship and sustainability. We recognize that our activities have an impact on the environment, and we are dedicated to minimizing that impact through responsible practices and policies. All employees, clients, suppliers and partners are expected to comply with environmental regulations, adhering strictly to all applicable laws, regulations, and standards, including obtaining necessary permits and following best practices in environmental management. Everyone is encouraged to actively seek ways to reduce waste, conserve energy and water, and minimize our carbon footprint. Supporting initiatives that promote sustainability, such as recycling programs, reducing single-use plastics, and using sustainable materials, is essential to our collective effort.

We expect all members of our organization to promptly report any environmental concerns, violations, or incidents to the appropriate authorities within the company, ensuring that any issues are addressed and resolved swiftly. Additionally, we are committed to continuous improvement and encourage participation in ongoing training and education about environmental issues and sustainable practices. By adhering to these principles, we contribute to the protection of our environment for current and future generations.

Quality

Ework Group is committed to ensuring high quality in all aspects of its operations by adhering to a strict Code of Conduct. This code is not only an ethical framework but also a fundamental part of the company’s quality management system. Ework Group is dedicated to operating according to principles that promote integrity, fairness, and transparency, thereby fostering trust with both clients and partners. By systematically following and monitoring compliance with these principles, Ework Group ensures that the quality of their services and suppliers is consistently maintained and improved. This commitment includes regular evaluations and training to ensure that all employees and partners act in accordance with the company’s quality standards and ethical guidelines.

Political lobbying

Ework Group observes neutrality with regard to political parties and candidates. In some cases we engage in public policy issues vital to success with our company’s business. However, any political lobbying is only carried out by authorized employees of Ework Group and such activities must always follow applicable laws and be performed transparently and with integrity and honesty.

Communication and Marketing

We uphold honesty and transparency in all our communications, ensuring that our messaging is clear, accurate, and aligned with Ework Group's values. Marketing materials, press releases, and all other content we produce must truthfully represent Ework Group's offerings and expertise, without exaggeration or omission. We communicate our commitments and achievements accurately, particularly in areas such as sustainability, diversity, and corporate responsibility, ensuring consistency with actual company practices. We embrace diversity and inclusion in our communications, ensuring that all content reflects respect for various cultures, backgrounds, and perspectives.

Our department is committed to inclusive language and visuals, striving to reflect a diverse and equitable workforce across all markets.

Confidentiality and Data Protection

We respect the confidentiality of Ework Group's proprietary information, our consultants' data, and our clients' information. We comply with all data protection laws and regulations (e.g., GDPR) and follow best practices for handling sensitive information, ensuring it is used responsibly and securely in marketing and communications activities. We represent Ework Group professionally across all digital channels, including social media, ensuring our brand's reputation is upheld and communicated with integrity. We do not engage in or tolerate online behavior that could be seen as misleading, disrespectful, or damaging to the company's reputation. Our social media presence should always reflect Ework Group's commitment to integrity, respect, and professionalism.

We aim to create content that builds trust with clients, consultants, and colleagues, avoiding any deceptive or manipulative tactics in campaigns or messaging.

Collaboration and Respectful Communication

We work collaboratively within the department and with colleagues in other functions and markets, fostering a culture of respect, inclusion, and constructive feedback.

Clear, respectful communication is expected in all interactions, whether with team members, consultants, clients, or external partners.

Every piece of content, from campaigns to client communications, should reinforce Ework Group's identity as an ethical and innovative leader in the talent industry.

Our marketing and communications activities adhere to all relevant laws and industry standards, from advertising regulations to intellectual property rights.

Continuous Learning and Improvement

We are committed to continuous improvement in our field, staying informed about industry trends, ethical standards, and evolving regulations that impact our work. We actively seek feedback and engage in professional development to uphold high standards of excellence in marketing and communications.

By following these guidelines, the Marketing and Communications department at Ework Group will continue to drive trust, uphold ethical standards, and build meaningful connections with clients, consultants, and partners.

4. Our responsibility as a business partner

We focus on our Clients, Partners and Professionals

We comprehend the importance of knowing and understanding our clients. We listen to our clients' viewpoints and their wishes help us to constantly improve ourselves, maintain long-term client relationships and always focus on their needs. Our network of Partners and Professionals are essential for our client relationships to continue blossoming and therefore we need to nurture these networks regularly.

Suppliers and business partners

Suppliers and business partners must comply with all laws, including those on labor, environment, and anti-corruption. Ework Group require ethical behavior, including integrity, transparency, and no tolerance for bribery or fraud. Environmental sustainability is essential, with a focus on reducing waste and conserving resources. Suppliers and partners must respect human rights, ensuring fair wages, safe working conditions, and prohibiting forced or child labor.

Health and safety are a priority, and high product quality and safety standards must be maintained. Confidentiality and data security must be upheld. To achieve this, we have a specific code of conduct under which our suppliers confirm that they understand, accept, and act in accordance with Ework Group's values and guidelines.

Ework Group is committed to conduct business objectively and with Ework Group's best legitimate interest first. However, conflicts of interest may arise in all relations, activities and transactions related to clients, shareholders, employees and other stakeholders.

For Ework Group, it is of importance to avoid conflicts between private and business interests, or even the appearance of such conflicts. All our decisions shall be resolved based on objective criteria and not affected by personal interests or relations.

In the event of any conflicts of interests or potential conflicts of interest the employee, consultant or other person involved by Ework Group concerned shall contact and inform their closest manager about the matter. All conflicts of interest must be mitigated to the extent possible.

Prohibition of money laundry and terrorism financing

Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) are prioritized focus areas within Ework Group. We adhere to applicable laws and regulations governing anti money laundering and terrorist financing.

Ework Group carefully ensures that we earn all our revenues in an ethical and legal manner. Ework Group prevents money laundry and terrorism financing by following standard processes in all our financial activities with complete transparency. Ework Group carefully checks the identity of business partners, customers and other third parties with whom Ework Group desires to conduct business. If required, Ework Group conducts an extended due diligence on third parties. In addition, we report suspicious activities or transactions that could involve money laundering or terrorist financing issues.

As a part of Ework Group's strategy with prevent money laundering and combat terrorism financing, Ework Group does not accept any activities resulting in money laundering and terrorist financing.

Corruption and Anti-Bribery Policy

At Ework Group, we are committed to the highest levels of ethics and transparency in every step of our business. Further, Ework Group is committed to conduct business ethically and transparently. In the light of this, Ework Group is determined to counteract all forms of corruption and bribery and to act professionally, fairly and with integrity in our business dealings and relationships. Ework Group has high expectations of all employees in the business to actively counteract corruption and bribery in the daily work at Ework Group, as well as all Ework Group's suppliers and clients. Read more in our Corruption and Anti-Bribery Policy on the Intranet.

Fair and free competition

Fair and free competition is preserved by antitrust laws to secure free competition. Ework Group is committed to conducting business pursuant with applicable legislation within this area given that free and fair competition leads to the best result for Ework Group's business as well as clients and society. Consequently, Ework Group conduct business solely based on merits and market economy.

In the event Ework Group has dialogues or interactions with competitors, Ework Group carefully invests in the lawfulness of such activity. When and if dealing with competitors, no information regarding pricing policies, profit margins is shared.

In the event Ework Group holds a dominant market position, Ework Group does not seek to take advantage of such a position.

5. Our responsibility in the workplace

Occupational health and safety

We are committed and promote a safe and inclusive working environment. Committed employees and managers are essential to our capacity to meet customers' expectations. For us, 'commitment' refers to our employees' demonstrated determination to develop and, along with their colleagues, focus on the customer and the business as key drivers in their work.

Ework Group is committed to providing a good working environment, and we have high expectations for our managers with staff responsibility to regularly review priorities and workloads. As colleagues, we are all responsible for creating a healthy work/life balance to avoid stress-related problems and as a company and employer we are responsible for creating good conditions for this.

For us, it is important that we take responsibility, both as individual employees and as a company, to contribute to something sustainable and beneficial for our customers and society. We see that a high level of trust and security within our teams is a cornerstone of our culture, contributes to sound risk management, and ensures compliance with regulations. We expect all employees to actively contribute to an open and safe team environment where we strive to make each other better.

Ework Group strives to offer an inclusive workplace where everyone has the opportunity for participation and development. We have zero tolerance for all forms of workplace discrimination, bullying, and harassment. We expect all employees to treat colleagues and customers decently and to take the initiative to speak out and draw attention to inappropriate behavior. In this way, we can meet our obligation as employer to investigate and prevent any violations, working together to create a safe working environment.

To emphasize the importance of our work environment, we conduct annual surveys that focus on the physical aspects of the workplace. Additionally, every week, we conduct employee surveys that

measure the psychological aspects of the work environment. Leaders are provided with training to help them understand how to interpret and act upon the results of these surveys. The overall psychological well-being score is also presented during company meetings, as this is a crucial and valued component of Ework Group's commitment to a healthy work environment.

Alcohol and drugs

Ework Group's employees may not use unprescribed narcotics, abuse alcohol, or exhibit risk behavior for gambling or highly speculative transactions. These activities increase risks to personal health and the shared working environment. They can also jeopardize the employee's personal finances, which can increase the risk of internal fraud. Ework Group's employees are offered rehabilitation services in the event various types of risk behavior or abuse are suspected.

Personal Data Protection

Ework Group acknowledges the importance of personal data protection and emphasis that the principles behind data protection strengthen individual rights.

"Personal Data" is defined as any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as: a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Ework Group is committed to collecting, using, retaining and disclosing personal data in accordance with applicable laws and expects suppliers and business partners to do the same.

Ework Group acknowledges privacy and personal data protection as a core consideration in every step of the organization. Accordingly, Ework Group must daily consider the privacy risks before collecting, using, retaining or disclosing personal data within our organization.

In the event any personal data breach is discovered or suspected, it must be reported immediately in accordance with established procedures for incident handling.

Security and protection of information and intellectual property

Protection of information means that we protect information from exposure to unauthorized actors. Ework Group understands that it's important to protect company information against accidental or unauthorized disclosure, misuse, improper alteration or destruction.

Confidential information is any information that is not public, such as Ework Group's trade secrets, business marketing plans, product development information, inventions, manufacturing methods, employee and salary information and financial information.

Personnel at Ework Group are not allowed to discuss confidential information in public places or on the internet. In addition, personnel are only entitled to access or share confidential information if there is a legitimate business reason for the disclosing.

Ework Group possess extensive know-how and confidential information that brings the organization a competitive edge in the marketplace. Ework Group vigorously protect our intellectual property and confidential information, and follow our internal policies on the proper use, safekeeping, and handling of such property and information. We are committed to respecting the intellectual property and confidential information of others and expect the same from them in return.

IT Security

As part of our commitment to maintaining the highest standards of integrity, transparency, and professionalism, this section outlines our responsibilities and expectations regarding information security, IT security governance, and compliance with relevant international standards and regulations. This addition applies to all stakeholders, including employees, contractors, and partners.

Information security and risk management

Confidentiality, integrity, and availability: We are dedicated to safeguarding the confidentiality, integrity, and availability of all information assets. Every individual must adhere to security protocols to prevent unauthorized access, disclosure, or alteration of sensitive information. Protecting our data is a shared responsibility essential to our operations.

Risk management: We adopt a proactive approach to identify, assess, and mitigate risks to our information assets and IT systems. Regular risk assessments ensure that potential threats are addressed promptly. All employees must report any security incidents or vulnerabilities immediately to maintain a secure environment.

Access control and data governance

Access control: We enforce strict access control measures, ensuring that only authorized individuals can access specific information based on their roles. Multi-factor authentication, strong passwords, and regular audits are mandatory to prevent unauthorized access.

Data governance: We manage data in compliance with relevant privacy and data protection laws. Data must be handled responsibly, with safeguards to prevent misuse or breaches. Regular reviews of data management practices are conducted to ensure ongoing compliance and security.

Operational resilience and compliance

Operational resilience: We are committed to the security and resilience of our IT systems and critical services. Business continuity plans are regularly updated and tested to ensure we can continue to operate effectively during disruptions.

National security compliance: We strictly adhere to national security regulations, where applicable, protecting classified information and ensuring critical activities are safeguarded. Personnel involved in sensitive operations must undergo security clearance checks, and any incidents affecting national security must be reported promptly.

Continuous improvement and reporting

Training and awareness: Regular training is required for all stakeholders to ensure understanding of information security practices and compliance obligations. This reinforces the importance of protecting our organization's information assets.

Audits and reviews: We conduct regular audits to verify compliance and effectiveness of our security measures. Non-compliance will result in corrective actions and, if necessary, disciplinary measures.

Reporting concerns: We promote transparency and accountability. Any concerns or violations of this code should be reported immediately. A whistleblower policy is in place to protect those who report in good faith.

By following these guidelines, we ensure that our company remains a trusted and secure partner, upholding the highest standards of information security, and IT security governance.

Handling company assets

At Ework Group, we respect our tangible and intangible assets and do not use them for non-business purposes, but solely to achieve Ework Group's business objectives, unless otherwise authorized by appropriate management. It is never accepted to use company assets for personal gain or for illegal activities.

Examples of tangible assets are real estate, products or personal equipment, including our computers and other mobile devices that store important and confidential company information and personal data of our employees and stakeholders. Examples of intangible assets are brands, patents, trademarks, know-how, trade secrets, copyrights, goodwill and information.

Sanctions

All Ework Group personnel, board of directors and contractors to Ework Group must adhere to all applicable sanctions imposed by multinational bodies. In addition, it is strictly prohibited to conduct any business with persons or companies listed in sanction lists.

6. Decision guidance

Your responsibility – good judgement

A Code of Conduct cannot address all potential situations and ethical considerations, but it does provide us with a framework of principles upon which to act. If we end up in a situation involving an ethical challenge or potential violation of the Code of Conduct, all employees are obliged to seek guidance from our internal regulations. The internal regulations you are expected to observe are listed at the end of this Code of Conduct. Our employees can access all the rules and regulations via our Intranet.

Our Code of Conduct should guide us in our business relationships and help us build long-term relationships with customers and other partners. As an Ework Group employee, you have a great amount of personal responsibility – if you are uncertain in any situation, ask yourself the following questions. You are always welcome to discuss the issue with your immediate leader or our People & Development team.

Guiding principles

- Is it in line with Ework Group's values?
  - *Consultative* – Do we lead the way and apply best practices to optimize performance?
  - *Committed* – Does it drive success together and leverage our collective knowledge to stay ahead?
  - *Collaborative* – Do we learn and create together and act responsibly to deliver sustainable value?
  - *Curious* – Does it help to embrace change and acknowledge different perspectives to shape our future?
- Is it legal, ethical, and justifiable?
- Is it risk-free for Ework Group, my colleagues, our clients, partners and professionals?
- Have I received sufficient support from others in making this evaluation (colleagues or manager)?

7. Upholding the Code of Conduct

Compliance

All employees, board members, and contractors are expected to comply with the Code of Conduct. If you as an employee are unsure about how to act in a particular situation, it is your responsibility to ask your immediate manager for guidance. High expectations are set for managers with staff responsibility in terms of their knowledge of and compliance with our Code of Conduct, since they are expected to be good role models and be able to support the organization and their employees. Ework Group's managers are also responsible for creating awareness of the Code of Conduct's provisions and ensuring that procedures are in place for good internal control. Upholding and ensuring compliance with our Code of Conduct requires continuous team dialogue about its contents. Ewok creates awareness of our internal regulations through this Code of Conduct, mandatory training sessions for new hires, and recurring knowledge updates.

Reposting misconduct, violation and whistleblowing

At Ework Group, we want the working atmosphere to be characterized by open-mindedness and straight- forward dialogue. Systems must be in place for promptly and easily reporting any violations or irregularities. We recommend that you ask your immediate manager for support in connection with such reporting. In Ework Group's internal regulations (policies, instructions and guidelines), routines for reporting misconduct are documented as well as the role responsible for the specific regulation.

Whistleblowing

Ework Group has implemented established routines for whistleblowing, to be used by all employees. Routines have been established by Ework Group's Board of Directors as part of the Policy on employee ethics, bribes and whistleblowing. The whistleblowing function is designed to alert Ework Group of and help manage serious incidents that may negatively affect Ework Group's customers, employees and/or other stakeholders. Whistleblowing is a warning system that can be used by employees (including consultants and other service providers) to report suspected breaches to external or internal regulations.

- Through *Whistleblower Software ApS*, an external and independent system provided for reporting on an act or misconduct within a company where there either is a public interest of disclosure, or which is contrary to certain areas of the EU-law and/or national legislation.

Reporting is made to identify persons and functions and can be done openly or anonymously. Although no evidence is required to report such a suspicion, the report needs to be specific and submitted in good faith. Whistleblowing is regulated through laws and external regulations, including specific requirements on integrity and protection for employees reporting a suspected breach. Information is available on Ework Group's webpage with details on how to proceed, the positions at Ework Group that handle whistleblowing and other reports of misconduct.

Measures taken in the event of violations and misconduct

In the event of deviations from the Code of Conduct and underlying governance documents, an investigation is initiated, and measures are taken. Such violations may result in disciplinary action, including corrective discussions, transfer, or termination of employment. Misconduct related to financial crime, market abuse, and other illegal activity triggers immediate intervention and may lead to a report being filed with the police or other authority

Internal policies you are expected to observe

The following is a list of internal, Group-level governance documents that form the basis for the Code of Conduct. Additional internal steering documents about ethics and conduct may apply for your function or team. All internal policies are available on the Management Systems & Policies page on Ework Group's intranet and are regularly updated. As an Ework Group employee you are expected to know and observe these.

- Human Rights Policy
- Equality, Diversity & Inclusion Standard
- Standard against bullying, harassment and sexual harassment
- Alcohol and Substance Abuse Standard
- Work Environment & Rehabilitation standard
- Legal standards on equal treatment in employment (specific to Poland)
- Standard for Safety against Threat and Violence
- Corruption and Anti-Bribery
- Data Protection
- Ework Group Privacy Notice
- IT Security
- Whistleblower Policy
- Environmental Policy
- Quality Policy
- Information Security Policy