



Transparency Act Ework Group Norway

2024

About Ework Group

Ework Group AB (publ) provides total talent solutions with a focus on IT/OT, R&D, Engineering and Business Development, and has today close to 13,000 independent professionals on assignment. With no professionals employed, Ework can unbiasedly match every assignment with the right skills from the whole market. Ework serves as the contract counterparty for both professionals and purchasers of professional services.

Ework Group AB is the Parent Company of the Ework Group. Operational activities are conducted through the Swedish Parent Company, the subsidiary Ework Group Public AB, and subsidiaries in Norway, Denmark, Poland, and Finland. The head office is in Stockholm, and there are regional offices in Gothenburg, Malmö, Linköping, Västerås, Helsinki, Oslo, Copenhagen, Warsaw, Wrocław, Gdynia and Katowice. Ework Group has approximately 350 employees where 30 of them are employed at the Norwegian office.

For more information about Ework, please read our [Annual report](#).



Ework Group values transparency, ethical responsibility, and sustainable business practices, as highlighted in our [Annual Reports](#). As the Transparency Act is a Norwegian legislation, the reporting according to that Act is performed by Ework Group Norway AS and the due diligence process is conducted on our Supplier base at Ework Norway. However, our management and quality systems are managed from our Parent Company and the work is done in close collaboration with the Group Management. We also strive to use these assessments as an inspiration for how to improve our responsibility work throughout the entire group.

Ework Norway reported according to the Act for the first time during the spring 2023. We have conducted a new due diligence assessment of main parts of our Supplier base during the fall of 2023, using the same methodology. This approach allows us to attain a clear understanding of our potential impact on society and enables us to take necessary measures to address actual and potential adverse impacts on fundamental human rights and decent working conditions. By examining our supply chain and engaging in dialogue with our Suppliers, we aim to mitigate negative consequences associated with our business operations. Through sharing our challenges, actions, and accomplishments, we aim to build trust, engage in meaningful dialogue, and contribute to a sustainable and socially responsible business ecosystem.



In this report, we will provide an overview of our progress on due diligence of our Supplier base. We will focus on due diligence efforts, examining potential adverse impacts within our supply chain and outlining risk mitigating measures. By sharing our actions, challenges, and accomplishments, we aim to build trust, engage in meaningful dialogue, and contribute to a sustainable and socially responsible business ecosystem.

Ework Group use the terms Partners & Professionals when referring to our Suppliers and Consultants on assignments. However, as the Transparency Act includes internal Suppliers as for instance Suppliers to our office, we will use the terms Suppliers (those on assignment) and internal Suppliers (those delivering to our office). The Suppliers on assignment are in main focus due to the large share of them.

How do we work to positively influence our business environment?

We have a close collaboration with our Suppliers to ensure their awareness and compliance with relevant legislations and principles, this to promote responsible practices throughout our supply chain. With over 500 active Suppliers on assignment in Norway, both domestic and foreign, we have the possibility to make a positive difference in our business environment. Considering our business, we have identified wages and working conditions as the areas within our business with the highest probability of negative impacts.

Our commitment to accountability and transparency is reflected in our internal guidelines & policies and Code of Conducts, where we hold ourselves and our Suppliers accountable for upholding fundamental human rights and decent working conditions. We conduct due diligence assessments, manage risks on daily basis, maintain open communication channels, and provide effective complaint mechanisms. Mentioning that we have both internal and external whistleblowing services to always secure a safe way to report any unworthy circumstances. We regularly report on our efforts, progress, and challenges in addressing adverse impacts.

Due diligence and risk assessments of our Supplier Base

Our primary focus is on facilitating an efficient and flexible utilization of skilled professionals in our clients' projects and operations. By connecting organizations with qualified experts, we enable agility, innovation, and cost-effectiveness in project staffing and management. Our services encompass for instance talent sourcing, contracting, and administrative support. Which makes us accountable for ensuring an ethical responsible Supply chain.

Ework Group have had routines for quality assurance of all our Suppliers since the origin of the Company. These routines are continuously improved, and the improvements have been intensified in alignment with the requirements of the Transparency Act and other changes in the legislation. An example is the information our Suppliers get when being onboarded and what they need to declare in order to sign a contract with us. We have embraced the opportunities of this Act and will continue to use it as a part of our risk assessments and our strategic business management.

All Ework Group Suppliers on assignment must fill in a Supplier form and sign our Supplier Code of Conduct. Ework Norway's Suppliers need to document that they are registered in Norwegian Company registers (if domestic) and that they have a Liability and Company insurance. In addition to our formal routines regarding quality assurance of our Suppliers we are in close dialogue with our Suppliers and Professionals. The close relations and dialogue are an important aspect of our business as this is vital in order to deliver the best competence to our Clients, in addition to ensure that we cooperate with serious and reliable Suppliers who for instance have Professionals with decent working conditions. We recognize that safeguarding the rights and well-being of all workers, regardless of their origin or contractual arrangement, is of utmost importance.

Ework Norway are conducting a risk assessment of our Supplier base several times a year. Based on our internal statistics and extensive knowledge we are able to identify the highest-risk areas at the given time. By using this method, we can proactively address potential concerns.

An area that emerged as a risk also during the latest assessment is wages and working conditions for workers from foreign Suppliers, during this assessment we did not only focus on countries outside the Nordic region, we included all.

Additionally, we have identified Suppliers who exclusively provide services through migrated (transferred from another Supplier) or name-given (found by the Client) professionals. These Suppliers may have been sourced through channels outside Ework, and as a result, we may not have the same level of information and close relationship with them as we do with other Suppliers sourced by us.

Lastly, we have identified internal Suppliers operating in areas known for challenges related to low wages and risks related to decent working conditions, for example food delivery and transportation. Those where thoroughly assessed during the first assessment and was therefore not included in our latest assessment.

To improve our quality assessment processes, we are using the OECD guidelines for Due diligence Process & Supporting Measures. By using the OECD guidelines as part of the due diligence processes, we aim to continuously enhance our ability to identify and address any areas of concern or potential adverse impacts associated with our operations.



Monitoring of our Suppliers and measures to mitigate risks

As presented in last year's report, we have, in addition to our regular Supplier onboarding routines, initiated a Supplier assessment process where we are sending a letter to chosen Suppliers and internal Suppliers to assess and gather information. The primary objective is to gain insights into the risk of potential non-compliance and to thoroughly inform the Suppliers of their responsibilities and take necessary actions. Our entire Supplier base is assessed, and the receivers of the letters is based on our assessment where we disclose the ones with the potential of highest risk and impact. We continued the work from our last assessment and sent letters to both foreign and Norwegian Suppliers. By using this method, we aim to send letters to all our Suppliers within reasonable time.

We are guiding Suppliers by clarifying our request and requesting additional feedback and documentation to gain a more comprehensive understanding of their approach to employee welfare and their relationships to their own Suppliers. We experienced a sufficient response from most of our Suppliers and we were glad to see that the majority of them were doing their own Supplier assessments. During our second assessment we did not have to explain the Transparency Act to many Suppliers. We can see that there is a general good focus on compliance to the Transparency Act in our assessed Supplier Base. Foreign Suppliers have less knowledge, but they have also gained more awareness compared to the first assessment.

By closely examining a significant part of our Supplier base, we have gained further insights into the practices and operations of our Suppliers across different countries, regions and industries. This assessment has allowed us to identify areas where improvements are necessary and to engage in constructive dialogue with our Suppliers to address any identified risks or concerns.

For those Suppliers who do not respond within the given time, we have been diligent in reminding them of the importance of their response. We believe in fostering open communication and transparency with our Suppliers, and we strive to ensure that all parties are aligned with the objectives of the Transparency Act. In instances where we have encountered Suppliers whose initial responses were not reassuring in terms of their commitment to responsible practices, we have taken proactive steps and guided them when needed.

During our first assessment we discovered a few potential risks, which all have been resolved. During the latest assessment we discovered a case where one professional was working more than what the Working Environment Act allows. This matter was solved in a good way through close dialogue with both the Supplier, Professional and Client. In addition, we have ended our collaboration with one of our foreign Suppliers as they do not deliver according to our requirements. We see the mentioned cases as great examples of how to use the Transparency Act in a good way and the importance of the effect of the Act.



Action plan

In order to mitigate and preferably cease risk of adverse impacts, to always comply with different legislations and to continuously improve our risk management, we have identified the following focus areas:

- To continue and increase the pace of actively engaging with our Suppliers on these matters
- A more comprehensive due diligence of the Supplier base 2024 (we have improved since the first assessment but will continue to focus on this topic)
- Continuously improve our routines for controlling our entire Supplier base
- Accelerate the ongoing improvements of internal Policies and documents
- Ensure efficient internal communication and training. E.g. by updating our intranet and hold information meetings and training sessions
- Ensure efficient communication externally. E.g. by actively inform our Suppliers if new Code of Conduct

Action plan

In cases where we have not received any response or the received response was insufficient, we continue to actively engage with these Suppliers. We are committed to upholding high standards of ethical responsibility and ensuring that our Suppliers share the same commitment. If we do not receive a satisfactory response from these Suppliers, we will carefully consider the continuation of our cooperation with them. In such cases, we explore more severe actions to address any potential non-compliance or inadequate adherence to responsible business practices, as we did with the foreign Supplier where we ended our collaboration.

Based on our continuous focus on compliance and risk assessments we are improving our routines for controlling our entire Supplier base in a more extensive matter than we have done in the past, not only as a due diligence process, but in our daily routines. It became evident that our existing routines for assessing internal Suppliers needed improvements. We have taken actions, but even clearer internal guidelines will follow on these areas. These updated routines will enable us to effectively identify and address any potential vulnerabilities or breaches and help us to avoid internal Suppliers who do not fully comply to relevant legislations.

The Due diligence process is established, and we will continue to use the Due Diligence Process & Supporting Measures by OECD. The due diligence of our Supplier base has become a central part of our risk assessments.

These measures have and will continue to enhance our responsible business conduct not only internally, but we already see and expect our Suppliers to increase responsibility and transparency in their value chains as well. Increased control enables us to mitigate cooperation with Suppliers with higher probability of actual adverse impacts on human rights and decent working conditions.

For questions or requests for more information, please fill out our Request for feedback-form on our homepage. For **Norwegian go [HERE](#) and English go [HERE](#).**

Stockholm, Sweden, February
2024 Karin Schreil, CEO

Oslo, Norway, February
2024 Trine Røssel
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