

TRANSPARENCY ACT

EWORK GROUP NORWAY 2026

ABOUT EWORK GROUP

Ework Group AB (publ) (“Ework”) provides total talent solutions with a focus on IT/OT, R&D, Engineering and Business Development, and has today close to 10,000 independent consultants on assignment. Without having any employed consultants in our company, Ework is unbiased in matching every assignment with the right skills – from the whole consultant market.

Operational activities are conducted through the Swedish parent company (Ework Group AB) and subsidiaries in Norway, Denmark, Poland, Finland, Belgium, Germany and Slovakia. The headquarters is in Stockholm, and there are regional offices in Gothenburg, Malmö, Jönköping, Västerås, Kalmar, Helsinki, Oslo, Copenhagen, Warsaw, Wroclaw, Gdansk, Ghent, Katowice and Frankfurt.

Ework has approximately 270 employees where 25 of them are employed in Norway.

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

Ework values transparency, ethical responsibility, and sustainable business practices, as highlighted in our Annual Reports. Even though the Transparency Act is a Norwegian legislation, the due diligence process is conducted on our entire supplier base. To support this process and to secure its quality and efficiency our integrated management systems including quality, environment and information security, are managed from our parent company, and the work is done in close collaboration with the group management. This also ensure that we work with continuous improvements within the process.

Ework began reporting according to the Transparency Act in spring 2023 and continues to build on this foundation. We continuously conduct due diligence assessments of key parts of our supplier base as part of our ongoing commitment to responsible business practices. 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.

We divide our suppliers into two groups: (1) Direct suppliers, meaning the ones that are supplying products or services directly to Ework, and (2) indirect suppliers, meaning the ones supplying their services to Ework's clients through Ework.

The due diligence approach differs between direct and indirect Suppliers due to the nature of our relationship. For direct Suppliers, Ework applies traditional supplier management and contractual follow-up. For indirect Suppliers, delivering services to our Clients through Ework, due diligence is integrated into the assignment process, with a strong focus on working conditions, continuous monitoring, and risk-based assessments.

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 390 active suppliers – both domestic and foreign – on assignment at our clients in Norway, we have the possibility to make a positive difference in our business environment.

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.

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 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 legislation. As part of our due diligence process, all Suppliers applying for assignments through Ework are required to acknowledge and declare their compliance with our Code of Conduct for Suppliers. This requirement forms a fundamental condition for engaging in business with Ework and ensures that our Suppliers commit to responsible business conduct, including respect for fundamental human rights and decent working conditions. We continuously use this requirement as an integral part of our risk assessments and strategic management of our supply chain.

All Ework's Suppliers on assignment must fill in a supplier form and sign our Code of Conduct for Suppliers. 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 for quality assurance, we maintain an active and continuous dialogue with our suppliers. If Ework identifies or has reasonable grounds to suspect that a supplier does not meet our requirements related to responsible business conduct, we initiate a structured follow-up process in line with the Transparency Act.

This includes engaging in dialogue with the supplier, requesting relevant information and documentation, and requiring the implementation of corrective action plans within a defined timeframe. Where relevant, we may also increase monitoring and conduct additional assessments. If a supplier fails to demonstrate adequate willingness or ability to remediate identified issues, Ework will take proportionate measures, which may include limiting, suspending, or terminating the business relationship. Through this process, we aim to prevent, mitigate, and address adverse We recognize that safeguarding the rights and well-being of all workers, regardless of their origin or contractual arrangement, is of utmost importance.

Ework conducts risk assessments of our supplier base on a regular basis. Based on our internal statistics and extensive knowledge we can identify the highest risk areas at the given time. By using this method, we can proactively address potential concerns. Our risk assessment methodology is based on ISO 31000:2018.

Risks related to wages and working conditions, particularly among foreign Suppliers, remain a recurring focus in our assessments. We continuously monitor these areas across all regions where Ework operates.

Suppliers operating in high-risk sectors, such as food delivery and transportation, continue to be part of our risk landscape and are included in our broader monitoring efforts. Our assessment processes are steered by the OECD Due Diligence Guideline for Responsible Business Conduct.

MONITORING OF OUR SUPPLIERS AND MEASURES TO MITIGATE RISKS

As part of our continued effort, we have, in addition to our regular supplier onboarding routines, maintained a supplier assessment process where we send a questionnaire to our strategic suppliers to assess and gather information.

The primary objective is to gain insights into the risk of potential non-compliance and to thoroughly inform suppliers of their responsibilities and the need to take necessary actions. Our entire supplier base is regularly assessed, and recipients of the questionnaire are selected based on our evaluation of those with the highest potential risk and impact.

We support our suppliers by clarifying our requests (if necessary) and asking for additional feedback and/or documentation to gain a more comprehensive understanding of their approach to employee welfare and their relationships with their own suppliers. We can see that there is a general good focus on compliance with the Transparency Act in our assessed supplier base. While foreign suppliers generally have less knowledge, we have seen a clear increase in awareness compared to previous assessments.

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.

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.

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, Ework have identified the following focus areas:

- Continuously improve our routines for controlling our entire supplier base - work is ongoing to digitalize and automate our quality control routines, aiming to improve efficiency, traceability, and consistency across assessments.
- We are working to strengthen our ability to proactively receive and act on feedback from suppliers and stakeholders, by developing more accessible and transparent channels for input and dialogue.
- Continue to 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
- During beginning of 2026 we reviewed and updated our Code of Conduct for Suppliers to be more in line with the recent regulatory changes.

ACTION PLAN

In alignment with the Transparency Act and our broader due diligence work, Ework revisited the formal double materiality assessment (in accordance with ESRS 2, IRO-1) to systematically identify and prioritize environmental and human rights risks, impacts, and opportunities across our value chain. This process was conducted for the first time in 2024 with support from an independent consultancy, and it was revisited again in the second half of 2025. The analysis incorporated stakeholder input from across the organization and established a framework for continuously mapping and updating material risks – both from an impact and financial perspective – relevant to responsible business practices. This activity strengthens our foundation for proactive risk mitigation, stakeholder responsiveness, and long-term sustainability alignment. The double materiality assessment will continue to be a yearly activity as part of our action plan, to ensure that we systematically identify and prioritize environmental and human rights risks, impacts, and opportunities across our value chain.

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. These updated routines will enable us to effectively identify and address any potential vulnerabilities or breaches and help us to avoid suppliers who do not fully comply to relevant legislations.

FOR QUESTIONS OR REQUESTS FOR MORE INFORMATION,
PLEASE [CONTACT US](#)



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