



**Dear Simployee, Customer and Business Partner,**

Simployer's ambition is to be the preferred choice for employees and customers within the HR sector in Northern Europe. We help you inspire, engage, manage, and develop your workforce by delivering flexible HR tech solutions and expertise tailored to local market needs – all in one place. This requires trust and credibility among our employees, customers and other stakeholders.

A Company's achievements are only as great as the strength of its people. This Code of Conduct (the "Code") is Simployer's main ethical framework and describes expectations, commitments and requirements for how we should conduct our business. It is an expression of the responsibilities that you, as an employee in Simployer, carry, and it serves as a guide for how our values – personal, competent and innovative – translate into our attitudes, behavior and everyday life.

In Simployer, we value trust, openness and that we learn from our mistakes. Should you ever find yourself in a situation challenging ethics, integrity, or our reputation, please consult with the Code, your leader or contact person in Simployer.

Together we can make the decisions that are right for ourselves, our Stakeholders and for the society.

**Vigleik Takle**

**CEO, Simployer**

## SIMPLOYER – OUR VALUES AND RESPONSIBILITIES

The purpose of Simployer’s Code of Conduct is to ensure that all employees and anyone acting on behalf of Simployer perform their activities in an ethical and socially responsible way and in accordance with our values.

### 1 Our responsibility as a Company

Simployer complies with the laws and regulations applicable to our business. The well-being of our employees is essential to our business, and as such, we need to empower them to both thrive and authorize them to have decision-making rights and resources available for this goal. This also includes and train them in the way we, in Simployer, will conduct our business.

### 2 Simployer’s Business Partners and their responsibility

Simployer’s Business Partners and Vendors shall comply with all applicable laws and regulations including, without limitation, laws and regulations aiming to protect human rights, fight against corruption, money laundering, terrorism, as well as laws and regulations related to antitrust, data protection, intellectual property rights, international trade compliance, health, workplace safety, and the protection of the environment.

We also expect all Simployer’s Business Partners and Vendors to adhere to the material content of this Code, or if applicable, the Partner’s own internal Code of Conducts or other relevant company routines that in sum regulates the equivalent topics as Simployer’s Code.

### 3 Your responsibility as an employee

All employees are expected to follow relevant laws and regulations, and to adhere to all relevant company routines, such as this Code of Conduct.

Should you at any point be in doubt, have questions regarding this Code, other internal routines, or you have a more general ethical question, please contact your leader, or our Compliance team ([compliance@simployer.com](mailto:compliance@simployer.com)).

### 4 Values and Culture in Simployer

- We are **personal** – we are interested, open and supportive both with colleagues and with all partners.
- We are **competent** – we always seek new knowledge to gain insight as a competitive edge.
- We are **innovative** – we are curious, challenging and brave in our endeavors to create new success.

Our *vision* is to “**Unleash the full potential in people**”.

## 5 The environment

In Smployer, we act in accordance with the applicable law and international standards regarding the environment. We protect the health, safety, and the welfare of employees, and strive to minimize negative environmental impact and to do improvements in environmental protection.

Smployer will take appropriate measures to operate in a manner that limits the environmental impact of our business, particularly by reducing consumption of energy and production of waste, and by improving prevention and control of all other potential forms of pollution, and to develop a positive contribution to the fight against climate change. And, more generally, we implement protective measures to prevent potential risk of damage to human or animal health and to the environment.

## 6 Sustainable supply chain

Smployer is making efforts to ensure its Business partners and Vendors comply with principles of this Code of Conduct, and that they adhere to local and applicable laws and regulations.

## 7 Anti-corruption

Smployer will not engage in any form of corruption and will adhere to all relevant laws and regulations to stop and hinder any such activity, and to take measures to prevent bribery, corruption, or other illegitimate use of influence.

## 8 Gifts and hospitality

Smployer and its employees will not propose any offer, promise, gift or benefit to any person for himself or for others, with the purpose of illegitimately gain personal benefits or make illegitimate use of its influence to obtain distinctions, jobs, contracts or any other favorable decisions. This includes, but is not limited to, offering, or making improper payments of money or offering anything of value to government officials, political parties, candidates for public office, or other persons.

Employees shall not use their position to gain personal benefits or receive inappropriate gifts. Normal gifts that would be unpolite to accept (minor token of appreciations) can be accepted, as well as expenses in relation to sharing a lunch/dinner in relation to meetings or other professional work outside of the workplace.

## 9 Facilitation payments

Smployer will compete on the merits of its products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In all business relationships, Smployer and Business partners must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, that these exchanges do not violate relevant rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices.

## 10 Fair competition

Simployer shall compete fairly and will comply with laws and regulations protecting competition and prohibiting antitrust practices. That means that we will not engage in price-fixing, bid rigging or market allocation and we will not reveal sensitive business information to competitors, and will compete with respect and in an ethically responsible manner when conducting our business.

## 11 Human rights and Labor Practices

Simployer does and will not use nor contribute to any form of slavery, forced or compulsory labor or human trafficking. Simployer will neither employ workers under the minimum age in respective jurisdictions. Simployer will adhere to applicable working-hours regulation globally, and will pay fair wages for labor, and adhere to applicable wage- and compensation laws.

Simployer promotes equal opportunities and treatment of employees, irrespective of skin color, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, or age. Simployer recognize the legal rights of workers to form or join trade-unions and to engage in collective bargaining, and this without any dis-/advantage of member or trade unions.

Simployer will not tolerate, and handle duly and according to internal routines, any unacceptable treatment of individuals such as mental cruelty, sexual harassment, or discrimination, or other threatening, abusive- or exploitative misconduct.

## 12 Health and Safety

Simployer will act in accordance with applicable legislation and international standards regarding occupational health and safety and provide safe working conditions for all employees and other hired personnel. Simployer will also provide documentation and training to make sure employees are educated in health and safety issues related to our business.

## 13 Anti-money laundering

Money laundering is the illegal process of concealing proceeds of illicit activity to hide the illegal origins of the money and thus “converting” it to assets that can be used freely and without raising suspicion. Simployer opposes all forms of money laundering and complies with applicable anti money-laundering laws and will take steps to prevent the misuse of corporate goods or transactions to facilitate laundering of money, including ensuring that customers are legally established and conducting law-abiding business.

## 14 Professional secrecy

Simployer will properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose (i.e., advertisement,

publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.

In regard to protection of proprietary information, Smployer will comply with all applicable laws governing intellectual property rights, including protection against disclosure, patents, copyrights, and trademarks.

## 15 Data Privacy

All employees have a duty of confidentiality in relation to users, prospective users, and all internal or external processed data, other employees, and Smployer's and its Group's activities and information. All stakeholders, Customers, Partners and Vendors shall therefore be able to rely on us to protect information and maintain confidentiality. The duty applies both externally and internally. The duty of confidentiality applies regardless of the circumstances under which we have received the information. Employees are bound by the duty of confidentiality even after the employment relationship with Smployer has ended, as regulated in the employment agreements.

Smployer is particularly dedicated to protecting the personal data that we process on behalf of our customers. To honor our commitment to privacy, all employees shall be aware of, and strictly comply with, Smployer's internal privacy policy, which sets out how personal data is collected, processed, and used by Smployer. We ensure that data and information is kept safe by having in place a comprehensive information security program, and implement relevant legal, technical, and organizational measures to safeguard data in the best way possible.

## 16 Conflict of interest

Conflict of interest occurs when personal interests, participation in external activities or business interests can affect decisions that employees make on behalf of Smployer. This could for example be due to close personal relationships, financial interests or positions of trust or similar roles or ownership interests. A conflict of interest can also arise between requirements and expectations from authorities, customer interests, Smployer's business goals and expectations from its owners.

Smployer shall seek to avoid conflict of interests, but if they arise, we shall be open about them and solve them in an appropriate manner.

The employee's external engagements must not hinder the performance of his/her duties and functions in Smployer. Such external involvement must also not undermine confidence or the ethics in the line of business. In case of doubt, the employee shall provide information about external engagement to their nearest manager who shall seek to resolve the matter or escalate it to management if needed.

## 17 Intellectual property rights (IPR)

Intellectual property rights are of vital importance and value for Smployer, and all employees are expected to protect and honor any such rights and adhere to all relevant laws

and agreements regulating any such rights. All employees have agreed to Smployer's IPR-regulation as part of the employment agreements.

## 18 Use of social media

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In Smployer, we believe in engaging and transparent communications - both externally and internally. We trust our Smployees to act as ambassadors for Smployer in social media, and posting content according to our values: innovative, competent and personal. We use social media to build relationships and share insight, and trust our Smployees to be ethical, open and respectful when engaging online.

## 19 Reporting of concerns

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Employees, Customers, Business partners or others that becomes aware of violations of laws and regulations or Smployer governing routines such as this Code, should report the matter to the nearest leader or business-contact at Smployer, or to the Smployer Compliance team if needed ([compliance@smployer.com](mailto:compliance@smployer.com)). Smployer has internal routines for reporting and handling any such matters.

Smployer will not retaliate or perform reprisals against any person who in good faith reports a violation of this Code or other routines or applicable regulation. If in doubt, please contact your nearest leader or the Smployer Compliance team or use Smployer's deviation system (available to employees only) to report a matter, whereas it is also possible to report matters anonymously.

## 20 Follow up and consequences

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Breach of this Code, Smployer governing documents or laws or regulation may result in actions being taken towards the employee, business partner or supplier associated with the breach, in addition to any contractual or legal remedies between Smployer and the breaching party.

The parties to a matter who are being investigated for a potential violation, will have the opportunity to be heard prior to any final decision. Smployer expects employees, business partners and vendors to share information and relevant documentation that will enable Smployer's assessment of the potential breach of the Code or relevant laws or other regulation.

The actions and outcome of the matter will depend on the nature and seriousness of the violation, and on the degree of commitment shown to mitigate the matter after discovery and notice. Actions may range from requests for information, formal warnings, required actions to mitigate or ultimately, termination of agreements/employment or business-arrangements.