

# Eezy Plc Code of conduct





## INTRODUCTION

# Eezy aims to build a more sustainable working life, for all

Eezy's mission is to be a maker of good working life. Our vision is to make work a happy matter. Sustainability and responsibility are an integral part of achieving these goals.

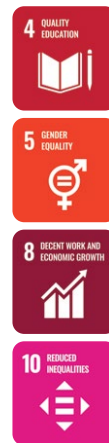
As Finland's most comprehensive expert on working life, we make a significant social impact. We serve our customers in areas such as recruitment, strategy, culture and leadership development, recruitment, employment services, light entrepreneurship, and HR research. We employ around 25 000 people a year, carry out 900 organisational development projects, analyse 200 000 HR survey responses and conduct 3300 people assessments a year.

We build and develop a more prosperous, equal, and diverse working life together with our clients and other stakeholders. We protect the safety of our employees. We use data and AI responsibly. We are a major contributor to taxes and pensions, and we take care of our environmental responsibility. It is important for us to always act in accordance with the ethical principles described in this document.

Our own sustainability program is divided into two main themes: Good Work for All and Prosperous Work Communities. The program is based on the UN Sustainable Development Goals (UN SDGs). It has been developed taking into account, among others, the UN Global Compact initiative, the principles of the ILO Declaration of Fundamental Rights at Work and the human rights defined by the UN. As we are listed on Nasdaq Helsinki, we are also committed to reporting and developing our operations in accordance with the CSRD directive.

Eezy's values guide our actions in all our encounters. They are also the basis for our sustainability work. For us, a good working life stems from *collaborating with good intentions, always the proway, while playing our peers better, and taking 100% responsibility.*

# Eezy Is Committed To Sustainable Operations



## Our Sustainability Policies:



Eezy complies with all applicable legislation and collective agreements in all its activities.



Eezy is committed to upholding the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.



Eezy cooperates with trade unions, public administration and educational institutions.



Whistle blowing channel for our staff and stakeholders.



We pay our taxes in Finland.



Code of Conduct and Safe Space Principles



Policy for Responsible Use of Data and AI



Data Security and Privacy Policy



GDPR Guidelines



Equality Policy



Policy on Responsible Recruitment Process



Environmental Policy





# Eezy Sustainability Programme

The aim is to build a more sustainable working life, for all. Based on the UN Sustainable Development Goals impact assessment and the ESRS dual nature assessment.

## Good Work for All

- We are a significant employer: 25 000 employees and 47 000 jobs invoiced by light entrepreneurs in 2023.
- We offer opportunities for employment and career transitions for all - young people, retired people, migrants, light entrepreneurs, gig workers and permanent workers.
- We help people into employment by providing work life skills training for people with difficulties in finding work, career changers and migrants.
- Recruiting and employing responsibly at all times.
- As an employer, we ensure diversity, equality and inclusiveness.

## Prosperous Work Communities

- We aim to build a good and sustainable working life in Finland.
- We help develop thriving, equal and diverse work communities.
- We use data and AI responsibly.
- We are a major payer of taxes and pensions.
- We care about our environmental responsibility.
- We act in accordance with our Code of Conduct.
- We protect the mental and physical safety of our employees.



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# The Eezy way of doing things

Eezy's mission is to create a good working life. Sustainability and being a responsible employer are part of our core business. We are a major Finnish employer and we offer diverse employment and career change opportunities for everyone: young people, pensioners, immigrants, light entrepreneurs, leased employees and permanent employees. We help with employment by training immigrants and people who have difficulties in finding employment or are looking for a career change, for example. Our recruitment is always based on responsibility and equality. As an employer, we promote diversity and equality.

We build and develop healthy, equal and diverse work communities together with our customers. We protect the safety of our employees. We use data and AI responsibly. We are a major payer of taxes and pensions and we take our environmental responsibility seriously.

## EEZY'S VALUES ARE



### WITH GOOD INTENTIONS

We believe in and speak well of each other.  
We trust in each other's good intentions.  
This is how we build an open and sincere community – through goodness!



### ALWAYS THE PROWAY

We handle things professionally and with a positive attitude – yes, we can! We are curious to learn and try new things. We constantly improve our work and raise our standards.



### PLAY YOUR PEER ONES BETTER

We play our colleagues better. We invite friends to join us and work together. We leverage our diverse and skilled community. Encounters are sacred to us, and we are present in them.



### 100 % RESPONSIBILITY

Each of us is part of the solution.  
We ask questions and make suggestions.  
We provide feedback and help. We proudly stand together behind our work.

In all its operations, Eezy Plc (“Eezy”) complies with the laws of the EU and Finland, the rules of the Nasdaq Helsinki marketplace maintained by Nasdaq Helsinki Ltd. and other applicable rules of Nasdaq Helsinki Ltd., the instructions and regulations of the Financial Supervisory Authority and other authorities, the 2020 Corporate Governance Code for Finnish Listed Companies and the company’s corporate governance principles, the insider guide and internal insider guidelines for our sectors (including guidelines concerning the staffing services sector). We regularly monitor changes in legislation and adapt our operations accordingly.

This policy has taken into account, among other things, the UN Global Compact and the principles of the ILO Declaration on Fundamental Principles and Rights at Work and the Universal Declaration of Human Rights.

Eezy conducts all its activities in accordance with the law, this Code of Conduct and its corporate values. We also expect all our employees, customers, stakeholders and business partners to act in accordance with this Code of Conduct.

This policy, approved by Eezy’s Board of Directors, will be reviewed and updated as necessary.

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## Equal and inclusive working life

In our operations, we promote an equal and inclusive working life.

We treat all people equally and enable equal opportunities at work regardless of an individual’s appearance, ethnicity, origin, religion, beliefs, gender, sexual orientation and expression, age, disability, marital or family status or any characteristic defined by law or regulation.

We do not tolerate harassment, discrimination or other inappropriate behaviour. Anyone who notices unequal treatment must report it to their supervisor or another party whose duties include handling the matter. Suspected misconduct must be handled in accordance with the internal instructions, equally and without delay, whilst hearing all parties involved. You can also report suspected misconduct anonymously via Eezy’s whistleblowing channel.

Our principle of equality and equal treatment applies to all forms of work and their different aspects, such as training, career development and the entire lifecycle of the employment relationship. We encourage everyone to actively learn

new things. We encourage everyone to bring up their own ideas for the development of our operations and share their own competence and knowledge with each other.

The recruitment process for new employees and the recruitment decisions are based on equal and non-discriminatory treatment of job applicants and on legal requirements. We promote actions to ensure a non-discriminatory application experience for job applicants.

We comply with collective agreements and labour laws in our employment relationships and remuneration. We use our own internal processes to ensure that our employees’ salaries are paid correctly and on time in accordance with the applicable collective agreement and labour law. The terms and conditions of employment and remuneration of our employees working for our customers are governed by the collective agreement applied by the customer, unless their employment relationships are subject to collective agreements concerning Eezy.

We make sure that all our employees receive the necessary orientation training either by us or by our client company.





## Safe working environment

The working environment must be safe, promoting occupational safety and health and the well-being of people. We operate in accordance with current occupational safety and health legislation. We continuously improve the safety of the people working for us or for our customers. Together with our customers, we ensure that our employees have received both the task-specific work equipment and adequate occupational safety and health training for the work tasks and the working environment.

We ensure that our client companies understand their own occupational safety responsibilities towards our employees.

## Guaranteeing freedom of association

We respect the legal right of our employees to set up and join trade unions. We do not discriminate against anyone on this basis. We maintain good relations with labour organisations, trade unions and employee representatives. We encourage active dialogue with our employees so that we can respect their rights.

We expect our customers, partners and stakeholders to promote these principles in their own operations.

## Anti-substance abuse policy

The consumption of drugs and alcohol at work and working under the influence of intoxicants is prohibited. For problem situations, we have created an early intervention model and an operating model for referral to care. We also expect the same from our customers, partners and stakeholders.

## Respect for human rights

We respect and promote human rights in everything we do.

We do not condone the use of child labour, forced labour or the unjustified or illegal withholding of salaries. A child under the age of 15 is considered to be a child, and a child above this age is also considered to be a minor where so defined by local law. We recognise that employees under the age of 18 have special needs and we take these into account in our operations.

We do not condone actions that restrict the free movement of workers. Such measures include the employer taking possession of identity papers, passports or work permits as a condition of the employment relationship.





We do not condone human trafficking, modern slavery, forced labour or any other form of human exploitation. Through our own measures, we ensure that our domestic and international partners are reliable. We conduct a separate audit of our foreign partners' backgrounds and compliance with international human rights conventions before we start working with them.

We ensure that our labour import processes are reliable and appropriate. Our internal processes should be aimed at helping and supporting the integration, training and working of employees who have come to Finland through us.

At our request, our customers, partners and stakeholders must explain how they monitor human rights in their own operations and supply chain. Any violations must be addressed, and corrective action must be initiated without delay in a jointly agreed upon manner. If corrective action is not taken within the agreed upon time frame, we will terminate the cooperation immediately.

## Anti-bribery and anti-corruption

We do not accept, offer or request hospitality or gifts that may influence our own or our partners' decision-making or give the impression of such an attempt to influence. We do not condone or allow bribery or corruption in any form.

Any hospitality or gifts given or received must be appropriate. The hospitality or gift must always have a valid business reason and be of a very modest value. Hospitality or gifts must never be in violation of legislation, internal guidelines of the recipient's employer or generally accepted industry practices. Hospitality or gifts given must not be offensive or immoral. Hospitality or gifts must not put the recipient in a debt of gratitude nor create an impression to that effect. Particular attention and caution must be paid to situations involving the preparation of a business decision or the performance of a monitoring or auditing task, for example.

We do not make donations to political organisations.

We expect our customers, partners and stakeholders to comply with the same anti-corruption and anti-bribery regulations and procedures as we do ourselves.

## Marketing and sponsoring

We carry out our marketing in accordance with applicable laws, good practices and the marketing rules of the International Chamber of Commerce's (ICC).

We select sponsored events and organisations so that they are related to Eezy's business, strengthen our brand or drive our sales. Sponsorships should always be in line with our values.

## Sanctions and money laundering

In our operations, we comply with the valid sanctions legislation. We do not carry out business directly or indirectly with any sanctioned person or any other sanctioned operator. In addition, we do not do business directly or indirectly with any sanctioned state or region. We will immediately cease any cooperation with any entity that is already subject to sanctions at the start of the cooperation.

We exercise due diligence in identifying the backgrounds of our customers, partners, stakeholders and their owners as well as their potential inclusion under applicable sanctions, before we conduct business or start cooperation with them.

In all our business operations, we only cooperate with reputable and legally financed customers, partners and stakeholders. We exercise due diligence when selecting customers, partners and stakeholders.

We shall make our best effort to clarify the backgrounds of our customers, partners, stakeholders and their owners before we start cooperation with them.

We shall notify the competent authorities of any reasonable suspicion of money laundering as required by the relevant legislation.

We expect our customers, partners and stakeholders to comply with the same sanctions and money laundering regulations and procedures as we do ourselves. We also obligate these parties to inform us on their own initiative and immediately if they or their background parties are subject to any valid sanctions regulations.

## Confidential business information

We do not condone the abuse of business secrets or other confidential information, such as business information, competence or intellectual property rights. We take due diligence to prevent the abuse and disclosure of business secrets and other confidential information.

We enter into appropriate confidentiality agreements with our own employees, customers, partners and stakeholders to safeguard the business secrets of Eezy and its customers, partners and stakeholders.

We train our employees to ensure that they have the necessary understanding and competence to lawfully handle business secrets.

We expect our customers, partners and stakeholders to take similar measures and enter into agreements with their own partners to safeguard Eezy's trade secrets and confidential information.

## Compliance with competition law

In all our operations, we comply with competition law, regulations issued by the authorities and our own internal guidelines. Under no circumstances do we condone unlawful restrictions on competition, such as price or cartel agreements, unlawful exchanges of information



about competitors or abuse of a dominant market position.

We will immediately take the necessary steps to correct the matter and, if necessary, contact the competition authorities if we become aware of any prohibited restriction of competition.

We expect our customers, partners and stakeholders to comply with the same laws and procedures regarding restriction of competition as we do ourselves. We also obligate these parties to inform us, on their own initiative and without delay, if they or their background parties are suspected or deemed to have participated in any prohibited restriction of competition.

## Conflicts of interest

All decisions and measures concerning our operations must be made in the best interest of Eezy. We do not condone situations where the decisions made are, or could be, contrary to the interest of Eezy. We always act with integrity and fairness. We have drawn up separate guidelines for related-party situations.

Our employees must not let their personal interest affect their decision-making. Accordingly, the person may not participate in situations that could result in a conflict of interest or a conflict appearing as such between the employee and Eezy. Any situations with a conflict of interest must be reported without delay either via the whistleblowing channel or in accordance with Eezy's related-party guidelines.

## Climate and environmental impact

We are committed to assessing the climate and environmental impact of our own operations and value chain and, with regard to our own operations, aiming for climate targets in line with the Paris Agreement. We take measures to reduce the climate and environmental impact of our own operations.

## Protection of personal data

We ensure that the processing of personal data, i.e. its collection, registration, comparison, storage and disposal, is carried out in accordance with the legislation and official regulations. We respect everyone's right to privacy.

We protect the personal data of Eezy employees, job applicants, light entrepreneurs, partners and other stakeholders who are in our systems.

We ensure that the personal data is only processed, accessed and used by persons who require the personal data in order to perform their tasks. We ensure that the persons who process the personal data take appropriate precautions to protect the data.

We plan the processing of personal data in advance. We only collect information in our personal data registers that is necessary for the purpose of use. We ensure that personal data is not stored for longer than is necessary in order to fulfil the purpose for which it was collected.

We train our own personnel in the lawful use of personal data, so that the collection, use, retention and rights of data subjects can be exercised as required by legislation and during the recruitment process and employment or customer relationship.

In the event of a data breach, we shall investigate the breach immediately and notify the data subjects and the Data Protection Ombudsman of the breach without delay as required by legislation.

## Responsible use of technology and AI

We use technology, artificial intelligence and data responsibly. We use and develop technology and artificial intelligence to promote a good, equal, diverse and inclusive working life.

We are open about the use of AI – we ensure that the users of our services have the opportunity to understand what the algorithms do and what data they use. We also openly communicate it when we use AI in our services.

Solutions using artificial intelligence are carefully tested and piloted with a limited target group before they are put to use in production. The data used to train the system is known in order to identify and correct data biases.

The AI operates under human supervision. The AI assists with recruitment, but the decisions are always made by a person.

The aim is to make AI-assisted solutions widely and equally available to our employees in order to make their work more efficient.

## Use of insider information

We comply with all applicable laws, regulations and our internal instructions when handling or trading in Eezy's shares and other financial instruments. When trading in financial instruments, no person from Eezy may exploit insider information about Eezy or other companies.

We train our personnel who may have access to insider information in order to prevent the accidental or intentional misuse of insider information. We maintain a list of persons who may have access to insider information and a list of management and related parties in accordance with the Market Abuse Regulation.

Eezy's CEO, CFO and group communications shall, in accordance with the currently valid law and Eezy's internal policies and instructions, communicate matters that may affect the value of the company's shares. Other persons are prohibited from divulging these matters.





## Reporting misconduct

We encourage all our employees and partners to act in an open, honest manner and in accordance with this Code of Conduct. In line with this, we encourage everyone to report suspected misconduct either to their supervisor or to someone else who is responsible for investigating the matter according to Eezy's instructions. If necessary, suspected misconduct can be reported anonymously via Eezy's whistleblowing service, which can be found on Eezy's website and intranet. All reports received through the whistleblowing channel will be processed in accordance with Eezy's whistleblowing policy.

We do not allow any direct or indirect negative consequences for a person who reports suspected misconduct. We will take immediate action if this occurs.

## Monitoring of compliance

Eezy monitors that its employees, stakeholders and partners conduct themselves in accordance with this Code of Conduct. The monitoring is carried out by way of the company's internal audit and whistleblowing channel.

Additionally, Eezy may request investigations from its stakeholders and partners if it suspects conduct that violates this Code of Conduct. On a case-by-case basis, Eezy may also decide to audit the operations of a stakeholder or partner.



## Monitoring of non-compliance

Any violation of the Eezy Code of Conduct for employees will be handled in accordance with Eezy's internal guidelines. Depending on the severity of the situation, non-compliance with the Code of Conduct may lead to various labour law consequences and even termination of the employment relationship by dismissal or termination.

Any suspected violation of the Eezy Code of Conduct by a stakeholder or business partner shall be investigated with the party in question. If it is found that a stakeholder or partner has acted in violation of this Code of Conduct, they must correct their actions as agreed upon with Eezy.

### **Eezy shall terminate its cooperation with a stakeholder or business partner who:**

- Fails to follow a commonly agreed upon procedure to stop conduct that violates the Code of Conduct;
- Repeatedly violates the Eezy Code of Conduct;
- Has deliberately violated the Code of Conduct; and
- Has deliberately concealed or attempted to conceal conduct that is in violation of the Code of Conduct.

## Validity of the policy

The Board of Directors has approved this Code of Conduct during its meeting on 14 February 2024. The policy shall be valid from 14 February 2024 and will be revised as necessary.