



Document I.D.	Eficode Group People Policy Group Policy governing the People practices in Eficode Group
Owner	Head of People and Culture
Version	1.3
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Version Control

Version no and Issue Date	Latest Review Date	Summary of Changes
v1.0 / 1 November 2023	1 November 2023	Initial version
v1.1/24 September 2024	1 November 2024	Updated to add reference to the new supporting DEI and Anti-Harassment policies in sections 2 and 3.
v1.2/25 November 2024	25 November 2024	Reviewed as part of annual review by Head of People and Culture - No changes made.
v1.3/12 February 2025	12 February 2025	Updated to add reference to the new supporting Group Recruitment Policy into section 4.

1 Introduction

Eficode's culture is founded on the belief that our employees are the most precious asset for our company. Eficode is committed to providing a safe, inclusive, and professional work environment where all employees can develop and build their career. This Policy serves as a guide for all employees, management, and stakeholders in understanding our approach to people practices Group-wide. Furthermore, Eficode's people practices are based on acting in compliance with applicable laws, regulations and strong business ethics. There may be more specific guidance in country specific people policies, where such are issued. In case of conflicting guidance, local laws and regulations are to be followed always primarily.

This Policy is assessed regularly and updated accordingly. The responsible party for assessing and updating this Policy are the Group top management with the lead of the Head of People and Culture.

2 Eficode Culture

Eficode values are the cornerstone of our culture. Our values are:

- We want to change the world
- We take pride in results
- We learn every day
- We complete each other

Eficode culture is based on equality and the belief that our employees can bring their authentic selves to the workplace. We welcome people of diverse backgrounds to our work community, and through this, we believe we are greater than the sum of individuals. Our culture fosters continuous learning, collaboration, and diversity. We set our goals high, with the ambition of improving software development through modern practices, technologies, and ideas. We can only achieve this through our people, relying on strong people practices in our day-to-day operations. Eficode operates in the forefront of technological development, requiring us all to learn every day in order to stay ahead of the curve. At Eficode we complete each other and we are proud of what we can achieve as an expert community.

Eficode collects feedback on culture with regular pulse surveys. Survey results are used to identify improvement areas both on a team and an organizational level. Each Team

Leader is responsible for following up the feedback and responding to any questions or concerns coming from their team members. From these surveys, we also gain insight into the level of engagement among our employees and identify the areas where we need to prioritize improvement actions.

Eficode has a legal obligation to eliminate discrimination, harassment, sexual harassment, abuse of authority, bullying, and victimization of which it is, or should be, aware. More than that, we are committed to maintaining a zero-tolerance approach to all such conduct and want to encourage a culture where everyone feels comfortable engaging in an open and honest dialogue about these topics and are able to report any incidents encountered or witnessed. Our Anti-Harassment Policy which must be read in conjunction with this Policy outlines in more detail our commitments and the principles that apply to all our global operations and can be found here: [Eficode Group Anti-Harassment Policy](#).

3 Diversity, Equity and Inclusion

Eficode does not discriminate based on race, color, religion, sex, sexual orientation, gender identity and expression, gender reassignment, national origin, age, disability, or any other legally protected status in any of its employment or people practices. All employees are expected to treat each other with respect and professionalism. At Eficode we encourage each employee to voice their opinion in case of conflict with these principles. We support diversity, equity and inclusion with different employee led initiatives. As an employee of Eficode you can join an initiative or suggest one in the area of your passion. Our Diversity, Equity and Inclusion policy which must be read in conjunction with this Policy and outlines in more detail the key principles, expectations and ambitions for Diversity, Equity and Inclusion across the Eficode Group and can be found here: [Eficode Group Diversity, Equity, Inclusion Policy](#).

4 Recruitment and Resourcing

Eficode resourcing strategy focuses on aligning the expertise of our employees with the evolving needs of our work and customer requirements. All recruitment is based on annual resource planning, which is completed annually in connection with the financial budgeting process. Resourcing plans are constantly adjusted to align with the future business outlook and the workload of our current employee base

Resourcing needs are fulfilled by internal or external recruitment. We will hire the most qualified individuals for each position based on their skills, motivation, experience, and other relevant criteria. We commit to ensuring that our recruitment process is fair, transparent, and free from biases. Eficode's recruitment decisions are based on merit, qualifications, and business needs. Internal hiring supports the long-term career development of our employees. Therefore, in the case of equivalent candidates, we

would prefer to offer the opportunity to the internal candidate first. At Eficode we believe in an open recruitment market, hence we encourage our team leaders to post all external and internal job openings for a minimum of one week. Our Group Recruitment Policy must be read in conjunction with this Policy and outlines in more detail the key principles, expectations and ambitions for recruitment and resourcing across the Eficode Group and it can be found here: [Eficode Group Recruitment Policy](#).

5 Rewarding and Recognition

Eficode aims to offer fair, performance based, and market aligned compensation. Our compensation package consists of base pay, benefits and in some limited cases, bonuses. Compensation packages are reflecting factors such as individual performance, skills, experience, and market conditions. Eficode operates in multiple countries, and both base pay compensation levels and benefits packages are determined based on country-specific market practices. These packages may differ from one operating country to another. Individual compensation details are communicated to employees by their team leader upon hiring and as they change.

Country specific compensation principles are approved by the Eficode Remuneration Committee (subset of Eficode Board of Directors).

6 On-boarding

On-boarding aims at facilitating the smooth integration of new employees into Eficode, providing them with the necessary information, resources, and support to become productive, engaged, and aligned with the Eficode culture as smoothly as possible. Team Lead is, with the support of People Operations, responsible for a smooth on-boarding process. On-boarding is tailored for each employee, having generic elements (Eficode on-boarding) as facilitated by People Operations and role specific elements, defined by the Team Lead. On-boarding intends to cover aspects of Eficode culture, ways of working, policies, work content and expectations for the role, as well as relevant administrative procedures, such as timekeeping, holiday registrations and other relevant practices.

7 Internal Communications and language

At Eficode, we are committed to fostering open, transparent, and respectful dialogue throughout the entire organization. Employees are encouraged to share ideas, feedback, and concerns without the fear of retaliation. We provide regular updates on Eficode business performance and company development, to ensure that employees are well-informed. We use various communications channels, such as: team meetings, company-wide announcements, and digital platforms. Eficode Team Leaders are in a key

role of keeping the teams updated on what are the most relevant developments related to specific teams.

At Eficode we have a diverse workforce that includes individuals with multiple mother tongues. In order to be inclusive to everyone and to secure business continuity, our official language in Eficode internal communication is English.

This includes, but is not limited to:

- documentation;
- source code comments and variables;
- meeting memos;
- intranet contents;
- chat communication in official channels.

If there is a customer requirement, legal requirement or a strong justification, documents may be created only in local languages. In these cases, it is essential to ensure that relevant content is available in English for those who do not master the local language.

More detailed guidelines on security of different communications channels are defined in the [Security Policy - Eficode - Eficode Intranet](#).

8 Learning and Development

Eficode operates in the forefront of information technology developments, thus continuous learning and development being fundamental for success in our industry. We embrace integrating learning and development as part of the everyday work we do. At Eficode, we provide various opportunities for learning and professional development, including personal development plans, Eficode Academy, partner-led certification training, mentoring, and the sharing of insights in retrospectives and knowledge-sharing sessions

At Eficode each employee is ultimately responsible for their own development, motivation and growth ambitions. The Team Lead's role is to support this process by acting as a sparring partner and by facilitating learning related goal setting.

9 Health, Wellbeing and Safety

At Eficode we recognize that a healthy and safe workplace is not only essential for our team members' physical and mental health but also contributes significantly to their overall job satisfaction and productivity. We prioritize the health and safety of our employees. Eficode follows country specific regulations on Health and Safety matters. In addition to complying with local regulations, we support health and safety in various

ways. These include providing flexible working arrangements, increasing awareness on health-related topics through training, supporting employee initiatives related to leisure activities, such as various hobby clubs, and providing ergonomic workstations, among many other measures.

10 Disciplinary Practices

While we strive to foster a positive workplace culture, there may be instances where corrective action is necessary. In the event of breaching Eficode policies, practices or employee behavior not meeting the Eficode standards, disciplinary action may be taken up. At Eficode the disciplinary process is fair, consistent and treats all employees equally. Disciplinary processes are based on country specific laws and practices and are led by the People Operations for the country in question.

11 Leaving Eficode

While we want our employees to stay with us as long as possible, we understand that we cannot fulfill all career ambitions our employees might have. If an employee chooses to depart from Eficode, our aim is to conduct the process in such a respectful manner that the same individual would consider returning in the future with confidence to Eficode. Eficode People Operations team is conducting exit interviews for all leaving employees. Exit interviews results are confidential, and only anonymized summary data will be utilized to enhance our People practices at Eficode.

12 Raising a concern

Employees have the right to raise concerns or complaints through a formal grievance procedure. Eficode follows country specific legislation on formal grievances. We will investigate and address complaints promptly and fairly. In the event of having concern on someone breaking Eficode policies or work instructions, the first contact point is the Team Lead, followed by business unit lead and finally local People Operations and Legal channels.

Furthermore, Eficode [whistleblowing channel](#) provides a confidential and secure platform for employees to report concerns, ensuring transparency and accountability. In the event of serious breach or employee fearing retaliation, one can use a whistleblowing channel for raising a concern.

13 Contact Information

This policy is managed by

Sanna Lindner

Head of People & Culture

sanna.lindner@eficode.com

For more information of implementation of this policy, please contact the person mentioned above.