



Eficode Group Human Rights Policy

CONFIDENTIAL

27 March 2024

Document I.D.	Eficode Group Human Rights Policy Group Human Rights Policy setting out our commitment to human rights throughout our value chain.
Owner	Eficode Management Team
Version	1.1
Initial Issue Date	Implemented by resolution of the Board of Directors of Eficode Group Oy on 27 March 2024
Most Recent Issue Date	n/a

Version n:o and Issue Date	Latest Review Date	Summary of Changes
v1.0 / 17 March 2024	17 March 2024	Initial version
v1.1 / 24 March 2025	24 March 2025	Updated link to current version of Modern Slavery Statement and Whistleblowing Policy

1. Definitions

“**Board**” means the Board of Directors of Eficode Group.

“**Eficode Group**” or “**Group**” means Eficode Holdings Oy and all (or any, as context may require) of the legal entities belonging to the same group of companies as it, as set out in the Finnish Accounting Act from time to time.

“**Eficode People**” means all Eficode employees and Eficode non-executive directors, such as the members of the Board of Directors and those individuals acting as Eficode’s authorised agents.



“Policy” means this group policy governing human rights in the Eficode Group.

2. Purpose

This Policy contains our overarching commitment to respecting human rights, a commitment that is echoed throughout our Group policies, such as our Code of Conduct. It provides a clear framework so that Eficode Group, and all Eficode People, can continue to protect and uphold human rights, actively embedding this commitment and its overarching principles throughout our business. We recognise that business has the responsibility, and the ability, to contribute to positive human rights outcomes.

3. Scope

This Policy applies to all Eficode People. In addition, all contractors, subcontractors and individuals acting in any capacity for or on behalf of Eficode must adhere to the spirit of the Policy through the Supplier Code of Conduct. It is everyone’s responsibility to uphold our commitment to show respect for human rights in every aspect of how we do business.

This Policy sets out the principles that apply to all our global operations, with no exceptions. It is also anticipated that certain geographies within Eficode Group may have the opportunity to set more ambitious objectives in alignment with these principles.

This Policy is not a static document. It evolves with the changing landscape of our industry and the continuous growth of our Group. It adapts to new challenges and opportunities, helping us navigate a complex world with ethics and integrity. This Policy will be reviewed in response to significant change, and at a minimum annually.

4. Principles

This Policy supports the Eficode mission, our company values, and contributes to achieving our strategic goals. In all we do, across our global operations, we are driven by our commitment to a sustainable and inclusive world, which is reflected in the development of the solutions that we deliver to our clients, our internal activities and in conjunction with our suppliers and partners.

We believe that business can only flourish in societies where human rights are respected and protected. Our efforts to uphold human rights are grounded in the UN Guiding Principles on Business and Human Rights – which we are committed to implement. We recognise international human rights to mean, as a minimum, those expressed in the International Bill of Human Rights and the principles concerning



fundamental rights set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Where national law and international human rights standards differ, we will follow the higher standard; when faced with conflicting requirements, we will adhere to national law, while seeking ways to honor the principles of internationally recognised human rights.

5. Identifying and Addressing Human Rights Impacts

We recognise that we must take steps to identify and address any actual or potential adverse impacts which we may cause or contribute to through our own activities, or which may be directly linked to our operations, services or by our business relationships.

We manage risks by integrating the results of our due diligence into our policies and internal systems. We identify and assess impacts, act on findings including remediation where needed, track and work to measure our actions, and communicate with our stakeholders.

We understand that human rights due diligence is an ongoing process that requires particular attention at certain stages in our business activities, such as when we form new partnerships, engage new suppliers or our operating conditions change, as these changes may create new potential or actual impacts on human rights.

We recognise the importance of dialogue with employees, workers and other rights-holders who are or could potentially be affected by our conduct.

6. Protection Against Child Labor, Forced Labor and Modern Slavery

Modern slavery exploits other people for personal or commercial gain and is all around us, often out of sight. It takes many forms, including human trafficking, forced labor, bonded labor, descent-based slavery, child slavery, forced marriage and domestic servitude. Eficode is committed to eradicating modern slavery and labor exploitation within our business and supply chains. In compliance with the UK Modern Slavery Act 2015 and international best practice, we publish an [annual statement](#) on our actions under this commitment.

Eficode does not employ minors or children in any part of its business and strives to ensure that all third parties with which we engage do not practice child labor in any form in their supply chains and business operations.



Eficode does not use forced, bonded, or compulsory labor, and all its employees are free to terminate their employment at any time, by providing the legally or contractually required notice, as applicable.

7. Fair Wages, Benefits and Working Conditions

As a responsible business, employment contracts at Eficode are always provided in writing and in an understandable form. Pay and benefits are based on market practices, and at the very least, always meeting the applicable legal requirements. Eficode follows the local working time regulations and respects the free time and applicable rights for taking time off work of Eficode People. We promote flexible working, to give our employees the freedom to choose how they balance their work and personal life. We comply with labor laws in all countries where we are operational.

8. Freedom of Expression and Association

Eficode respects freedom of association including the freedom of being represented by trade unions and other employee representatives in accordance with local laws and global human rights. Eficode People are never punished or discriminated against for joining an association of employees or any other use of their rights to freedom of association.

At Eficode, we believe in collaboration, celebrating differences, and encouraging all Eficode People to express freely in a constructive manner their thoughts, arguments and opinions, and engage in open dialogue during team meetings, conference calls, forums, and employee surveys, respectfully, and without any fear of retaliation. We conduct regular 'Vibe' surveys among our employees on a variety of topics inviting them to share their honest feedback anonymously.

9. Harassment Free Environment

We are committed to maintaining a work environment that is free of harassment, violence, or any action that creates a threatening workplace; this includes any attitude, form of behavior, or situation that may be specified as harassment. Eficode People are expected to be mindful and respectful of personal and cultural differences, both among peers and between a manager and team member, so that everyone can contribute as their unique and authentic self and enjoy a comfortable atmosphere at work and work-related events.

10. Equal Opportunity and Fair Treatment



We aim to provide equal opportunities and fair treatment prior to, throughout and following recruitment, as well as within all our interactions with stakeholders, including protection against discrimination, irrespective of social, cultural, ethnic or national origins, religious or other beliefs, caste, gender identity/expression, marital status, pregnancy status, sexual orientation, disability, age, skin color, race, parental status, political ideology, military/veteran status, or trade union activity. Our Group Diversity, Equity and Inclusion Policy details our commitments and actions on these topics in further detail.

11. Delivery and Implementation

We commit to embed this Policy into our corporate culture and practices. Some of the ways we do this include:

- Incorporating ongoing human rights due diligence into relevant business processes as appropriate, such as impact assessments, and expanding the use of, and increasing the consistency of, such assessments throughout the Group.
- Engaging with relevant, potentially affected stakeholders in assessing and addressing impacts, such as employee forums and stakeholder surveys.
- Including human rights related requirements within contractual arrangements wherever feasible.
- Providing training to all Eficode People in relevant topics, such as modern slavery, diversity, equality and inclusion and business ethics.
- Providing guidance to business units whose activities require particular attention, such as those involved in procurement and people operations.
- Setting expectations of our suppliers via our Supplier Code of Conduct.
- Raising awareness of human rights through internal communications.
- Communicating across the Group on existing grievance mechanisms and processes, to empower our employees, suppliers and clients to raise concerns or queries about possible or suspected unethical conduct.

12. Human Rights Governance

The ultimate accountability for this Policy lies with the Group CEO, under the monitoring of the Eficode Board of Directors. The responsibility of implementing the Policy lies with the Eficode Management Team, country and functional leads across the Group, supported by an implementation program driven by the Group Sustainability and Compliance Manager and ESG Steering Committee. We work together to embed human rights in our day-to-day operations, to ensure respect and fulfillment of human rights as per international standards and as mentioned herein.



13. Looking Forward

We continually evaluate and review how best to strengthen our approach to addressing human rights, including labor rights. We increasingly see the impact on human rights resulting from environmental issues and climate change and understand that we can only resolve the challenges facing our world by addressing them together. While continuing to work to identify, reduce and avoid these impacts, we also recognise that some mitigation measures taken to reduce environmental impacts may adversely affect people's human rights. We aim to address this by taking a holistic and systems view approach to our ongoing work.

14. Raising Concerns

A wide range of individuals and organisations are engaged in the global effort to advance human rights. Recognising the increasingly difficult environment in which they operate, we do not tolerate abuse, threats, intimidation, physical or legal attacks or reprisals against environmental and human rights defenders.

If you need to raise a human rights concern you may report confidentially and anonymously through the whistleblowing channel, as outlined in the [Eficode Whistleblowing Policy](#).