Code of Conduct for JuhlerGroup

Introduction

This code of conduct ("Code of Conduct") sets out the minimum standard and ethical principles by which, all employees within Juhler Holding A/S and the subsidiaries within the Juhler Holding Group ("Juhler Group"), must conduct themselves. It serves to provide a common understanding of how we conduct business and how we adhere to the values described herein, and that all employees are required to read and relate to.

As a foundation for this document the company has developed specific policies related to important areas as Human rights and labour, Environment and Anti-corruption. Our work in these areas is guided by our membership and strong commitment to the 10 principles of UN Global Compact.

Purpose and values

Our objective is to expertly pair the ideal candidate with the perfect task for each client, ensuring a seamless and impactful collaboration. We do this by living out a set of values and a commitment:

- Helping people and businesses grow.
- We take pride in finding the best match.
- It's all about people.
- Large enough to cope, small enough care.

Our responsibility as employees

- Act with integrity and fairness in all our dealings.
- Treat everyone with respect and dignity.
- Foster a safe, inclusive, and supportive work environment.
- Uphold the principles and commitments outlined in our Human Rights and Labor, Environmental, and Anti-Corruption policies.
- Seek guidance when faced with ethical dilemmas.
- Report any misconduct or breaches of our policies.

We have no tolerance for retaliation, and no one will suffer any adverse consequence for raising a concern in good faith about potential misconduct in relation to this Code of Conduct.

Respect people and contribute to a responsible labour market

In JuhlerGroup we shall comply with laws, regulations, internal guidelines, and good business practice. The laws and regulations of each country and this code of conduct are to be considered fundamental to all our operations. Likewise, it is fundamental for us to exercise good business practice in accordance with our customers' and partners' expectations of us. We shall compete within the same laws, rules, and honest principles.

We shall ensure that the employees working for us experience a healthy and safe workplace. We shall adhere to the occupational health and safety rules that apply where we conduct business. We shall not engage in activities that jeopardize life and health.

Our attitude and objective are to focus on equality, ensure equal opportunities and rights for all, and to prevent discrimination based on race, gender, age, religion, family status, or disability. The company's business focus is the recruitment and leasing of personnel, and bears a special responsibility in matters concerning salary, advancement, and recruitment.

We shall treat people fairly and with respect. We shall not exercise, express, or otherwise act in a way that offends other individuals. We expect our partners, suppliers, and customers to have the same fundamental attitude.

Our environment

As responsible stewards of the environment, we actively seek to better our ecological footprint. We prioritize energy efficiency, sustainable procurement, and waste reduction in all aspects of our operations. Our travel policies favour eco-friendly modes of transportation, and we continuously educate our workforce on environmental responsibility. We are not only compliant with environmental legislation but also proactive in adopting practices that exceed statutory requirements.

Anti-bribery and anti-corruption

We maintain a zero-tolerance stance on corruption and bribery. Transparency, honesty, and fairness guide our business transactions. We prohibit illicit incentives and ensure accurate company records. All employees are responsible for preventing and reporting corruption. We encourage openness and provide a secure channel for reporting unethical behaviour without fear of retribution.

Conflict of interest

Conflict of interest can be a situation where you cannot make a fair decision because you will be impacted personally by the result.

In conducting our business with integrity, we must ensure that all decisions are in the best interest of the company and that there is no potential conflict of interest.

Gifts and hospitality

Gifts and hospitality can in some circumstances be part of conducting business. However, we must exercise caution by always considering the circumstance, type, and purpose and whether this is appropriate, by considering how the action is perceived by others.

Gifts and hospitality to customers or from our partners are only permitted if they comply with applicable laws, have a legitimate business purpose, proportionate and are of moderate value.

Safeguarding information

We rely on handling information to conduct our business and match the right people to the right task at the customer. Unauthorised disclosure and misuse of information may adversely impact our business, customers, candidates, temps, consultants, and partners who trusted us with the information.

It is our duty to ensure all information, whether representing intellectual property rights, trade secrets, personal, confidential, or sensitive information, are managed and processed responsibly.

Secure and reliable digital tools and applications are essential for us to serve our customers, candidates, temps, and consultants, in our daily operation.

Speak up

Juhler Group encourage reporting in good faith of any concerns or knowledge of irregularities or improper actions/behaviour committed, are suspected or likely to be committed or actions that fail to comply with applicable local laws and regulations, this Code of Conduct, or internal policies.

Reporting can be done through our whistleblower-system <u>https://juhlergroup.integrityline.com</u>, your manager or local HR-responsible.

All reports are handled with strict professionalism and an intention to secure the best possible protection of the legitimate interests of those involved, and through use of the whistleblower system, reports can be made anonymously.

Make it happen

Adherence to this Code is mandatory and non-negotiable. Our managers lead by example, ensuring that their teams understand and follow these guidelines. Our Human Resources and Compliance departments are tasked with the ongoing monitoring of the implementation of this Code. Regular training and communications reinforce our commitments.

Help us keep it alive

We will periodically review this Code of Conduct to ensure it remains aligned with our mission, reflects the highest standards of ethical conduct, and responds to evolving legal and social landscapes. Your feedback is invaluable in this process, and we encourage all employees to contribute to the evolution of our ethical practices.