

Digital Workforce Services (DWF) Code of Conduct and Whistleblowing

Code of Conduct principles

- DWF board of directors have agreed on “Code of Conduct” principles for DWF.
- Code of Conduct is designed to establish a set of common ethical working principles for all Digital Workforce employees globally.
- Code of Conduct is a public document that provides DWF’s customers, business partners, investors and other stakeholders information about the principles according to which DWF operates, and expects its suppliers, partners and subcontractors to operate.
- Code of Conduct is reviewed regularly to ensure that its contents conform to the ethical and regulatory standards that are applicable for Digital Workforce at any given time.

Code of Conduct

INTRODUCTION

This Code of Conduct is designed to establish a set of common principles for all Digital Workforce employees globally. Digital Workforce expects that also all Digital Workforce suppliers, partners and subcontractors follow the principles of this Code of Conduct in connection with their work for, or on behalf of, Digital Workforce.

The Code of Conduct provides Digital Workforce's customers, business partners, investors and other stakeholders information about the principles according to which Digital Workforce operates and expects its suppliers, partners and subcontractors to operate.

The Code of Conduct is reviewed regularly to ensure that its contents conform to the ethical and regulatory standards that are applicable for Digital Workforce at any given time.

DIGITAL WORKFORCE VALUES

Our organization is people driven and operates with minimal hierarchy. Together, as a team, we have outlined our company values, which are reflected in everything we do:

A learning mindset

Sharing knowledge, success and failures. Trying out new things with curiosity and daring to step out of the comfort zone.

Passion for customer success

We are passionate about our customer success and making sure that the customers get real value. Understanding customer needs, measuring satisfaction and performance.

EU Whistleblowing Directive

- The EU Whistleblower Directive came into force on 16th December 2019.
- EU Member States must put it into national law within two years, by the end of 2021.
- The directive focuses on **protecting whistleblowers** by means of a system that guarantees **anonymity and confidentiality** so that potential abuses can be more easily uncovered.

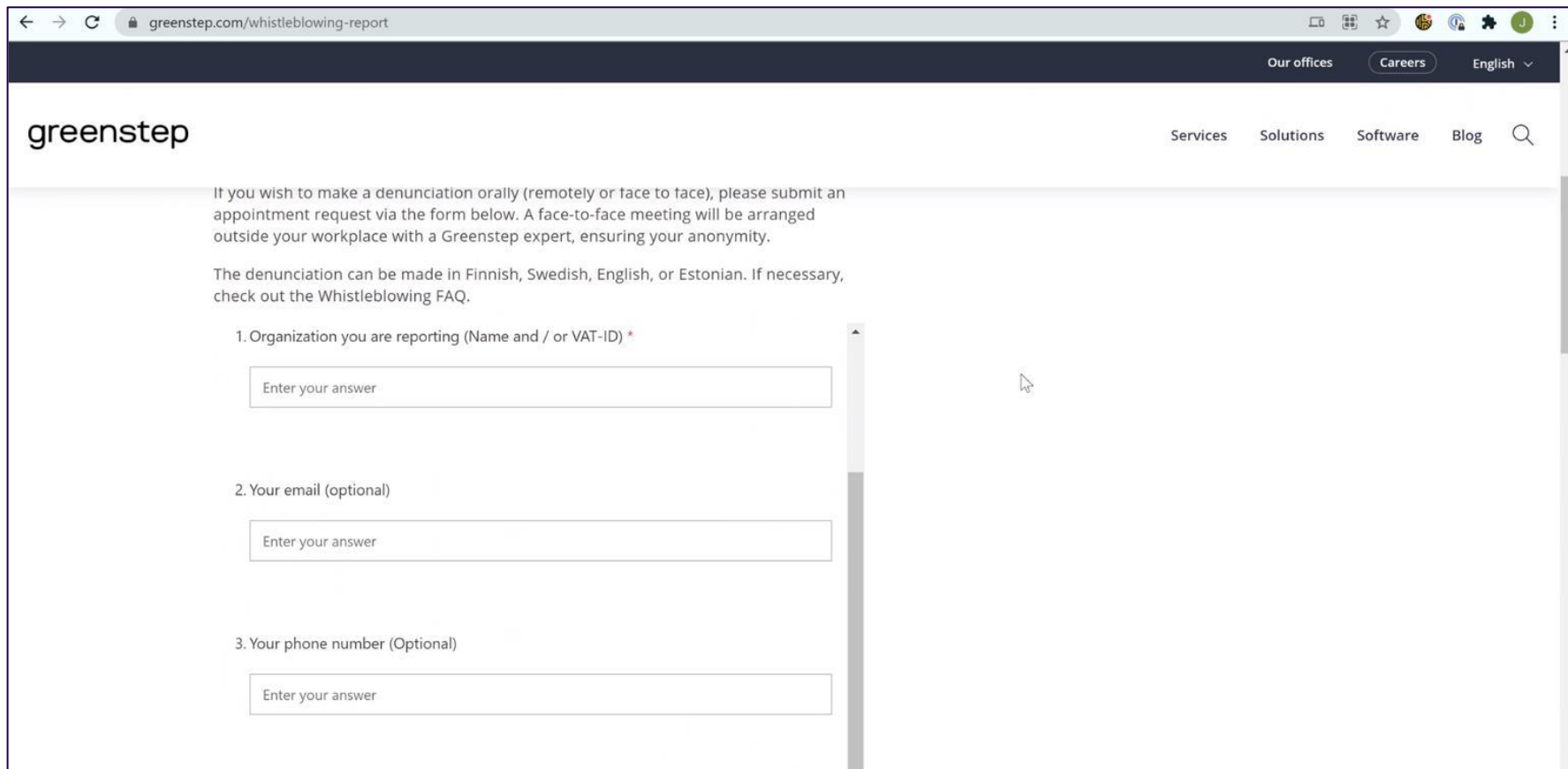


Whistleblowing in Digital Workforce Services

- We have established an external whistleblowing-channel.
- Through this channel, a person can report any illegal or unethical behaviour that he/she has noticed in Digital Workforce.
- All notifications that are made through this channel will go to our Whistleblowing service provider "Greenstep", who will handle the notifications appropriately and completely anonymously
- It's also possible to leave a notification completely anonymously (i.e. a person does not need to leave any contact information with the notification).
- The notification can be made with any computer with public internet access.
- The web-pages have the following language options: Finnish, Swedish and English.
- A notification will be confirmed to be received within 7 days.
- The company must inform about the processing of the notifications within 3 months from the notification date.

Our whistleblowing-channel

- <https://greenstep.com/whistleblowing-report>



The screenshot shows a web browser window with the URL greenstep.com/whistleblowing-report. The page features the Greenstep logo and navigation links for 'Our offices', 'Careers', and 'English'. A main navigation bar includes 'Services', 'Solutions', 'Software', and 'Blog'. The central content area contains the following text:

If you wish to make a denunciation orally (remotely or face to face), please submit an appointment request via the form below. A face-to-face meeting will be arranged outside your workplace with a Greenstep expert, ensuring your anonymity.

The denunciation can be made in Finnish, Swedish, English, or Estonian. If necessary, check out the Whistleblowing FAQ.

1. Organization you are reporting (Name and / or VAT-ID) *

2. Your email (optional)

3. Your phone number (Optional)

Thank you!

Karri Lehtonen

Head of Business Development

karri.lehtonen@digitalworkforce.com