

BENIFY'S CODE OF CONDUCT



A MESSAGE FROM JOAKIM ALM

At Benify, our cloud-based total compensation and benefits platform empowers companies worldwide to effectively manage and optimize their compensation and benefits programs. We are committed to assisting employers in attracting, rewarding, and retaining the talent they need to thrive. Our vision embraces modern workplaces characterized by supportive employers, contented employees, and outstanding benefits, irrespective of location or industry. With thousands of clients globally, our award-winning platform has revolutionized how modern employers engage with their workforce, enhancing millions of end-users' workplace experiences.

As a company, we hold ourselves accountable to adhere to legal and regulatory requirements, striving to set ethical benchmarks for our clients, employees, suppliers, and end-users alike. Fostering an open and inclusive workplace culture where every employee feels valued and respected is of utmost importance to us.

In our capacity as providers of compensation and benefits services, we recognize the opportunity to promote sustainable benefits. We aim to serve as role models and leverage our influence to positively impact our clients, thereby inspiring them to enhance their employees' well-being.

Embedded within our organizational ethos is the core value of "Show love." Our Code of Conduct reflects this principle, providing the framework necessary for us to conduct our business responsibly, make ethical decisions, and uphold the trust of our clients and employees.

I am confident that all Benify employees share my unwavering commitment to ethical conduct and responsibility in every circumstance. Each of us has a duty to our stakeholders to act in accordance with our Code of Conduct, and I strongly encourage all employees to familiarize themselves with its contents and embody its values in their daily work.



A handwritten signature in blue ink, which appears to be "Joakim Alm".

Joakim Alm
CEO

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All employees of the Benify Group (hereafter called Benify) act as ambassadors for the company, and thus are the best carriers of the Benify brand. To be a company associated with the advocacy of human rights and having environmentally sound business practices is a top priority for Benify and its brand.

Benify's Code of Conduct outlines ethical behaviour standards for all Benify employees, and in all countries where we operate. Furthermore, it explains how Benify complies with international legislation and norms. It provides guidance and emphasises our commitment to ethical practices and helps us carry out our three core values:

- Exceed Expectations
- Think Ahead
- Show Love

We expect everyone at Benify to know and follow the Code of Conduct. Leaders are expected to foster a culture aligned with the Code and to integrate ethical considerations into decision-making processes. Additionally, within the areas that we can influence, we will strive to ensure that our suppliers, sub-contractors, agents, joint-venture partners, and other partners follow the principles of our Code of Conduct. Those engaging with customers and suppliers must adhere to it. By adhering to the principles outlined within this document, we uphold the values of trust, integrity, and accountability, which are fundamental to our success as a company. While it complements laws and policies, it doesn't cover every scenario and thus requires good judgment.

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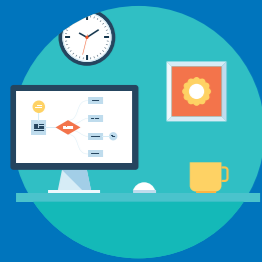


WORK ENVIRONMENT

At Benify, we strive to create and maintain a safe supportive and healthy work environment for our employees. We endeavour to make the work environment adaptable to the varying needs of each of our employees, and that our premises, facilities, furnishings, and work equipment are of the highest standard. We also strongly advocate an inclusive work environment and strive to ensure that all our employees feel a sense of community and belonging in the workplace. We do not tolerate any form of discrimination.

In our Work Environment & Health Policy, we outline our approach in more detail.





ENVIRONMENT

At Benify, we acknowledge our environmental impact and work towards minimising it by continuously improving our own environmental performance and making it more environmentally conscious. In addition, we strive to prioritize suppliers that apply environmentally friendly principles in their operations to minimise the environmental impact across our value chain. We also have a opportunity to help our clients to minimise their own environmental impact by offering environmentally friendly benefits for their employees.

Our environmental approach is outlined in more detail in our Environmental policy and Sustainability Reports, which we ensure all employees at Benify to be aware of, follow and respect.



ANTI-CORRUPTION AND BRIBERY

Benify has a zero-tolerance policy towards fraud and bribery, and we are committed to working against corruption in any form.

- We will not violate applicable competition legislation.
- We will not, directly, or indirectly, offer or give any type of compensation to any person or organisation with the purpose to induce the person or organisation to act contrary to stipulated agreements or to obtain business deals or other privileges.
- We will not, direct, or indirectly, request nor accept any form of payment or other compensation with the purpose of inducing us to act contrary to our stipulated agreements.
- We account for all financial transactions correctly according to local accounting legislation.

In general, we should always be mindful when giving or receiving gifts. In our Anti Bribery Policy, we have outlined our commitments in more detail. When in doubt, all Benify employees are expected to check our Anti Bribery Policy or reach out for guidance and advice from a colleague or manager.





CONFIDENTIALITY AND PROTECTION OF INFORMATION

Information is one of Benify's most valuable assets. Our customers have chosen Benify to process and store sensitive information about their employees, and it is our greatest responsibility to ensure that their information is given the necessary protection.

Benify has an Information Security Policy which applies to all permanent, temporary, and contracted staff employed by Benify or its subsidiaries, as well as students and volunteers who have the right to access information under supervision. All personnel shall be updated on the Information Security Policy and act in compliance with this policy.





RESPECT FOR HUMAN RIGHTS AND LABOUR RIGHTS

It is important for Benify to have healthy and long-lasting relationships based on mutual respect and dignity with all employees and business partners. We are committed to respecting and promoting internationally proclaimed human rights and labour laws. Benify also follows the ethical rules of The United Nations Convention on the Rights of the Child.

The terms of employment that are offered to employees of Benify shall fulfil the demands of local legislation and relevant ILO Conventions and guidelines contained therein.

Freedom of Association and Protection of the Right to Organise Convention

Benify and its employees have the right to form associations without prior permission.

Right to Organise and Collective Bargaining Convention

Benify will not interfere with collective bargaining or employees' rights to form or join unions or other associations of their choosing. Nor shall Benify discourage union membership. Worker representatives shall not be subjected to discrimination and shall be given access to employees at the workplace.

Forced Labour Convention & Abolition of Forced Labour Convention

Employees have the legal right to perform their work on company premises with the freedom to terminate employment under the agreed period of notice without penalty or loss of wages.

Employees have the freedom to leave the premises when the shift ends. Personal documents or other belongings may not be withheld. Employees shall not be charged, directly or indirectly, with any fees or commissions

as a result of their recruitment or hiring processes. If the recruitment agency has requested such a fee, the employee must, in turn, be compensated.

Employees should not be asked to provide a deposit, receive late remuneration, or be offered pre-payment or loans with the consequence that they will incur debt which subsequently binds them to employment.

Equal Remuneration Convention

Employee compensation and conditions of payment are in accordance with current legislation and local standards. Benify maintains a transparent and reliable system for recording working hours and wages for all employees. There shall be no wage distinction between men and women for the same work performed.

Minimum Age Convention & Worst Forms of Child Labour Convention

Children under fifteen will not be considered for employment. Furthermore, child labour shall not occur under any circumstances within the organisation. A child is defined as a person under fifteen years of age. Child labour is defined as work performed by children, which conflicts with a child's right to healthy growth and development and which deprives a child the right to quality education.

Discrimination (Employment and Occupation) Convention

At Benify, we strive to create and maintain a work environment characterised by inclusivity, in which all our employees are treated with decency and respect.

Benify does not discriminate against any employee based on race, religion, gender, age, political affiliation, national origin, disability, health, sexual orientation or any other characteristic protected by applicable laws and regulations.

More information is available in Benify's Equality and Diversity policy, which all our employees are expected to follow and respect.



REPORTING ILLEGAL OR UNETHICAL BEHAVIOUR

It takes courage to speak up when something is not right, and we understand that it is not an easy thing to do. We do, of course, encourage all our employees to speak up if they are concerned that someone at Benify has violated any law or regulations, or in any way engaged in unethical misconduct that is against the stipulations of Benify's Code of Conduct and policies. At Benify, we place a high priority on transparency and accountability when it comes to addressing reported concerns and implementing corrective actions. We believe that open communication and accountability are essential for maintaining trust and integrity within our organization.

If you, as an employee, wish to report any illegal or unethical behaviour, we encourage you to contact HR directly with your concern or use our anonymous Whistle-blower tool. The goal is to ensure that any issues of concern are raised and to create a safe and supportive environment where employees can report any issues without fear of reprimand.





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more information