

BENIFY'S CODE OF CONDUCT



A MESSAGE FROM JOAKIM ALM

At Benify, we are committed to help modern employers attract, reward and retain the talent they need. We believe in modern workplaces with supportive employers, happy employees and great benefits regardless of location or industry. With thousands of customers across the globe, our award-winning platform has reinvented how modern employers engage with their employees and has made the workplace better for millions of end-users.

As a company, we are committed to following legal and regulatory requirements, and we strive to be an ethical frontrunner. With this goal in mind, we encourage an open culture at work where all employees feel welcome and are treated with loyalty and respect.

In our role as a provider of compensations and benefits services, we have a great responsibility to help our clients offer sustainable benefits for their employees, which positively impact their life and wellbeing. We should aim to be a role model and, in the capacity that we can, have a positive effect on our clients who are, in turn, inspired to help their employees.

One of our core values is Show love. Our Code of Conduct reflects this value and provides us with the framework necessary to operate our business responsibly, make ethical decisions and maintain our clients' and employees' trust.

I am confident that all employees at Benify feel as strongly as I do in that we should continue to be a company which acts ethically and responsibly in all situations. Each of us has an obligation to our stakeholders to act in accordance with our Code of Conduct, and I strongly encourage all employees to please read it and to live its values every day.



A handwritten signature in blue ink, appearing to read '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. 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.

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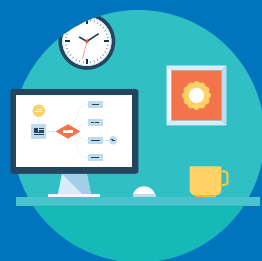


WORK ENVIRONMENT

At Benify, we strive to create and maintain a safe 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.

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





ENVIRONMENT

At Benify, we work towards minimising our environmental impact by continuously improving our own environmental performance. We also have a responsibility 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 Sustainability and Environmental policy, which we expect all employees at Benify to 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 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 international 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, however, 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.

If you, as an employee, wish to report any illegal or unethical behaviour, we encourage you to contact HR directly with your concern. Benify has also implemented a "whistle-blower" tool, which encourages employees to report any issues concerning harassment. 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.





Please visit **benify.se** for more
information