

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.

Integrity in all relationships

We follow through our promises and appreciate all people around us. Taking responsibility for our actions and daring to state things, disagreeing respectfully.

Caring for each other

We are always there to care and help each other. Being interested in others performance, development and understanding their point of view.

BUSINESS PRACTICES

Compliance with Laws and Regulations

Digital Workforce is committed to comply with all applicable laws, rules and regulations in all locations where Digital Workforce operates. If applicable laws and regulations are more permissive than this Code of Conduct, Digital Workforce complies with this Code of Conduct. If applicable laws and regulations are more restrictive, we comply with the legal requirements. In addition, Digital Workforce always acts in accordance with high standards of business ethics.

Import, Export and Trade Compliance Rules

As a global company, Digital Workforce transfers its services across national borders. Our business transactions can be subject to various trade controls and laws that regulate export and import. We are committed to complying with the laws that govern global trade of our products and services.

Antitrust and Competition Laws

Digital Workforce complies with all applicable competition laws in all locations where Digital Workforce operates. Digital Workforce promotes free and open competition and does not engage in fixing or controlling of prices with competitors or dividing or allocating markets or customers.

Anti-Bribery and Corruption

As part of Digital Workforce's commitment to conducting its business in an honest and ethical manner, Digital Workforce takes a zero-tolerance approach to bribery and corruption and upholds all laws relevant to countering bribery and corruption in all jurisdictions in which it operates. Digital Workforce has a separate Anti-Bribery and Corruption Policy, which sets out the responsibilities of all Digital Workforce employees in observing and upholding Digital Workforce's position on anti-bribery and corruption and which complements this Code of Conduct.

Please refer to the Anti-Bribery and Corruption Policy for further details.

Anti-Money Laundering

Digital Workforce complies with all money laundering laws or laws prohibiting financing for illegal or illegitimate purposes. "Money laundering" is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

Political Involvement

Digital Workforce does not take political stands and does not give financial or other kind of support or assistance to individual politicians, candidates, political parties or institutions. The Digital Workforce name, logo or any resources owned by Digital Workforce shall not be used to promote the interests of political parties or candidates.

Conflicts of Interest

Digital Workforce employees shall avoid any activities which may lead to a conflict of interests. It is strictly forbidden to participate in any relationship, situation or

arrangement that conflicts with Digital Workforce's interests or would compromise the ability to ethically fulfill contractual obligations to Digital Workforce.

Insider Trading

In the normal course of employment, Digital Workforce employees, partners or subcontractors may come into information about Digital Workforce, or companies that we work with, that is not known by the public but, if it was, might have a significant impact on the price of the company's shares or other financial instruments. Trading in securities or other financial instruments based on such non-public information – "inside information" – is prohibited by law and may result in criminal prosecution. Even giving a tip to family or friend is prohibited, if this is to be used as a basis for buying or selling shares. Information is considered to be non-public unless it has been disclosed to the public as a stock exchange release.

Environmental Responsibility

Digital Workforce is committed to minimizing the environmental impacts of its activities worldwide. Furthermore, as the global leader in providing intelligent automation services, Digital Workforce aims to foster environmental awareness and responsibility among its employees, customers and suppliers.

Digital Workforce complies with all applicable environmental regulations and expects its suppliers and partners to do so, too. Digital Workforce pursues a precautionary approach to environmental challenges by undertaking activities to promote greater environmental responsibility and encouraging the development, diffusion and use of environmentally sustainable technologies and solutions. Digital Workforce is committed to open and transparent communication on its environmental performance.

IPRs AND TRADE SECRETS

Intellectual Property Rights and Confidentiality

Digital Workforce's intellectual property is an invaluable asset that must be always protected. Intellectual property includes our brand, trademarks, logos, copyrights, inventions, patents and trade secrets.

Digital Workforce ensures that due attention is paid to the appropriate security and safe keeping of proprietary information. Digital Workforce is committed to protecting the confidentiality of the information of its customers and other business partners and does not disclose such information improperly.

Data Privacy

Data privacy is important to Digital Workforce. Digital Workforce processes all data about identified or identifiable individuals – or “personal data” – with due care and in accordance with applicable data protection laws. We are committed to data protection and privacy compliance across our Digital Workforce operations. We are also committed to helping our customers with their data protection compliance journey by providing robust privacy and security protections built into our services and agreements.

Please see the Digital Workforce Privacy Notice for further details at www.DigitalWorkforce.com/privacy-notice.

Financial Accounting, Internal Controls and Audit

Digital Workforce is committed to follow applicable accounting principles and standards, to report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with law.

WORKPLACE ENVIRONMENT

Human Rights

Digital Workforce unconditionally supports and promotes human rights. Digital Workforce does not tolerate, contribute to, or facilitate any activity that violates human rights.

People are employed based on the principle of equal opportunity and without distinction to race, colour, gender, religion, affiliation or origin.

Digital Workforce does not tolerate in any context the use of servitude, child labour, forced labour, human trafficking, or slavery in our operations in any region we operate, and will be specifically compliant with the relevant standards of the International Labour Organization.

Digital Workforce is committed to act according to the values declared within the United Nations' Universal Declaration of Human Rights, and we commit to obey the United Nations' Global Compact principles.

Equal Opportunities, Diversity and Inclusion

Digital Workforce supports diversity in workforce and promotes learning and development at an organizational, team and individual level. Digital Workforce's goal is to attract, develop and retain a workforce that is diverse and to ensure an inclusive work environment that embraces employees' differences.

Anti-Discrimination and Anti-Harassment

Employment at Digital Workforce is based solely upon individual merit and qualifications directly related to professional competence. Digital Workforce never discriminates or treats employees or job applicants unfairly in matters that involve recruiting, hiring, training, promoting, compensation or any other term or condition of employment. Making employment decisions based on personal characteristics,

such as race, colour, ethnicity or national origin, gender, age, religion or disability is against our policies.

Digital Workforce seeks to provide its employees a work environment that is free from harassment of any kind as well as any other offensive or disrespectful conduct. Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment.

Health and Safety

Digital Workforce is committed to a safe and healthy workplace. Digital Workforce complies with the Workplace Health and Safety legislation in each of the countries within it operates. All employees are responsible for ensuring healthy and safe working conditions. Digital Workforce supports activities and initiatives that improve employee health and well-being.

Digital Workforce is committed to following all applicable wage and working hour laws and regulations.

Expected Workplace Behaviors

Digital Workforce expects employees to display respectful and professional behaviour at all times. This behaviour would include, but is not limited to:

- Act with honesty, integrity and fairness in all areas of work;
- Support workplace diversity, respect the values of others and work towards a fun, productive, innovative team environment, free of discrimination, bullying and harassment;
- Demonstrate on-the-job behaviour that enhances the company's professional reputation;
- Communicate openly, honestly and respectfully with team members;
- Demonstrate support and care for colleagues;
- Display constructive conflict resolution behavior; and
- Follow reasonable and lawful requests from management

RAISING CONCERNS

Any violation of the principles defined in this Code of Conduct should be reported to Digital Workforce immediately. Report can be made to you line manager, or to Legal or Human Resources.

Digital Workforce employees may also report any violation or suspected violation of this Code of Conduct by reporting it to the Digital Workforce Whistleblowing Committee. The identity of the person making the report will be confidential and known only to the people necessary to ensure that the case is handled properly. Any Digital Workforce employee who makes a whistleblowing report is protected from any repercussions, such as dismissal and other forms of reprisals. Please send a report of a violation to <https://greenstep.com/whistleblowing-report>.

To ensure that issues do not escalate to the point where they become a whistleblowing case, Digital Workforce focuses on communicating the company's values, rules and regulations regarding ethical conduct and encourage open communication within the company. The Digital Workforce Whistleblowing Committee meets regularly to discuss possible issues.

QUESTIONS OR SUGGESTIONS

If you have any questions regarding the proper conduct in a certain situation, or if you need assistance to take the appropriate action, please feel free to talk to your manager or contact the HR department.

If you have suggestions for improvements of this Code of Conduct, you may send your suggestions to communications@digitalworkforce.com