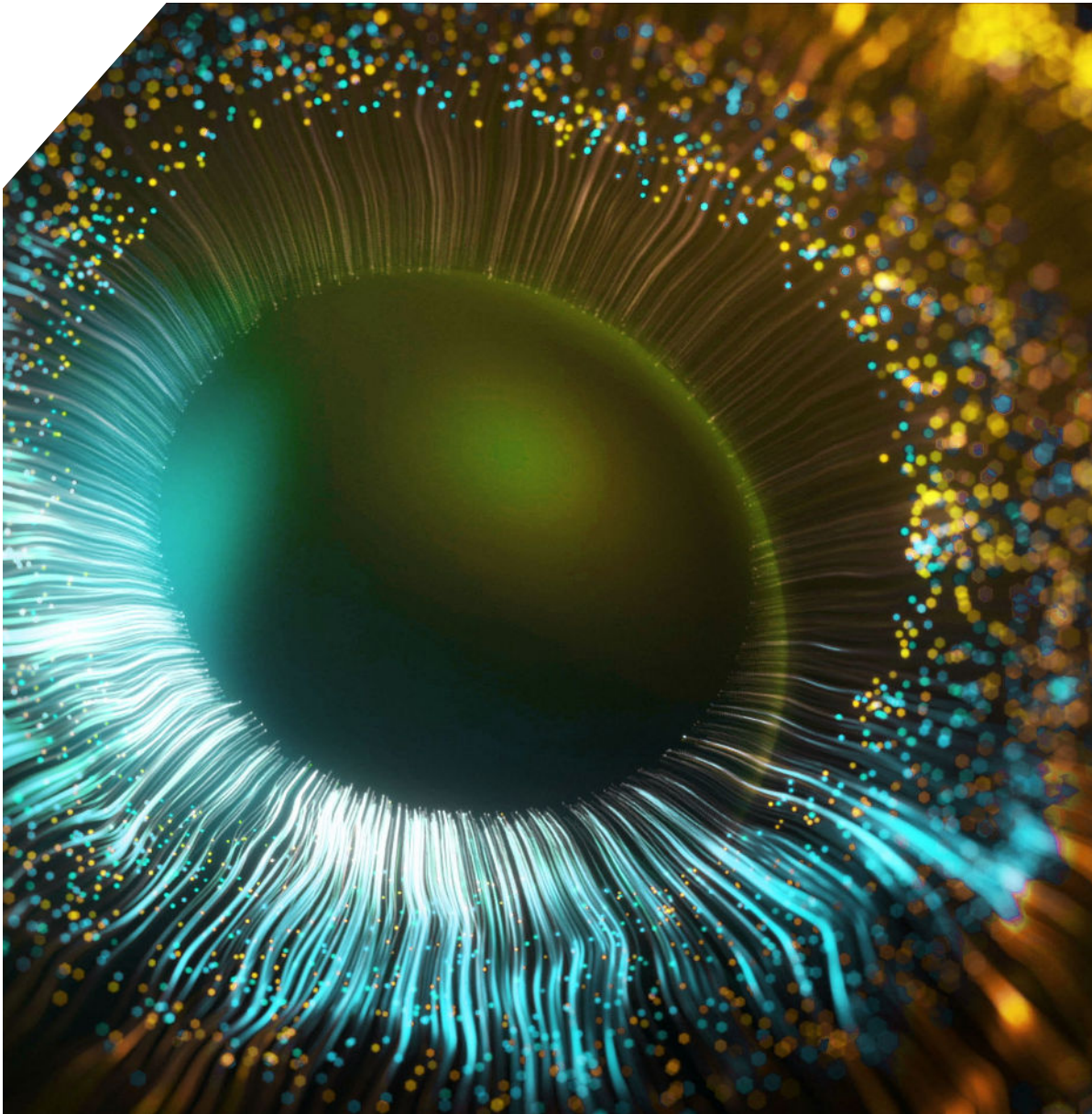


Akkodis Group Nordics

ESG Report 2023



Executive Summary For 2023

EBITA¹

NOK 378 million
(329 in 2022)
EBITA margin of 13,7%

1136,4

EMPLOYEES
(1664 in 2022)
including subcontractors

12.7%

TURNOVER
(14,5% in 2022)

REVENUE

NOK 2 760 million
growth of 10,14%
(2 661 m in 2022)

CARBON EMISSIONS

8 700 TONS
(2271 tons in 2022)

3,3%

SICK LEAVE
(3,5% in 2022)

Diversity

24%

WOMEN

(22% in 2022)

23%

WOMEN IN
MANAGEMENT

(26% in 2022 and
32% in 2021)

60

NATIONALITIES

39

AVERAGE
AGE



SYLOG



data:respons
SOLUTIONS

IT SONIX

epos

DONAT IT

TechPeople

The Akkodis Group Nordics Sustainability Journey

Scope and Structure

In our ongoing commitment to ESG, Akkodis Group Nordics (formerly Data Respons AS) presents its fifth ESG report, detailing our sustainability endeavors for the fiscal year 2023. This report offers a consolidated group-level analysis and discusses our tailored approach to addressing significant sustainability issues.

Developments and Challenges

Our growth and expansion, while a testament to our success, have led to an increase in emissions due to escalated volumes and intensified conflicts in the Middle East, which have compelled a shift from maritime transportation towards more frequent use of air transportation. These challenges highlight the complexity of maintaining our sustainability trajectory during periods of growth and geopolitical challenges.

Compliance and Assurance

We've secured external assurance for our carbon footprint from Cemasys, reinforcing the credibility of our data. The ESG report itself, while not reviewed by an external third party, stands as a testament to our transparent self-assessment.

Aligned with EU mandates for annual non-financial disclosures, our reporting process is inspired by this legislative framework and draws on the principles of the GRI framework for sustainability reporting, ensuring we meet international standards and best practices in our ESG disclosures.

Contact the ESG team at Akkodis Nordics



Sebastian Eidem

VP Operations
sei@akkodis.no



Isabelle Sarah Borchsenius

Marketing, Communication
& Sustainability Manager
ibo@akkodis.no



Sustainability through technology

Why ESG Matters to Akkodis Nordics

ESG (Environmental, Social, Governance) is crucial for us as it aligns with our ability to influence sustainability through innovative technology. We're committed to supporting solutions that save resources, reduce emissions, and enhance quality of life, ensuring sustainability remains central to our growth. With climate change accelerating and some impacts now irreversible, as per the UN Climate Panel, our commitment as an international organization is significant. By 2025, we aim to be net-zero, supporting science-based targets while upholding our values of generosity and responsibility.

Progress and Challenges

As Akkodis Group Nordics (formerly Data Respons), we've continued to mitigate environmental impacts in 2023 despite increased emissions due to the global economic rebound. Our journey includes reducing our carbon footprint across our operations and value chain.

In our commitment to environmental stewardship, we have successfully reduced our direct and indirect emissions (Scope 1 and 2) by improving energy efficiency and adopting renewable energy in our offices. However, our Scope 3 emissions have risen due to external factors, such as security-driven changes in shipping routes prompting more air freight. To address this, we're enhancing our approach through strategic collaborations. We're working alongside clients to develop more sustainable transportation options and partnering with suppliers to embrace eco-friendly production methods. These collaborative efforts are key to our integrated strategy for achieving a lower carbon footprint.

Carbon Neutrality Goals

Software Business

Targeting climate neutrality by 2025 through digital innovations and energy efficiency.

Hardware Business

Aiming for climate neutrality by 2030, focusing on sustainable supply chain and manufacturing processes.

Strategies for Reducing Carbon Footprint

Renewable Energy

Expanding use to fully power operations with green energy by 2025.

Energy Efficiency

Upgrading to high-efficiency infrastructure and equipment.

Sustainable Supply Chain

Enhancing procurement policies to favor environmentally responsible suppliers.

Employee Engagement

Promoting a culture of sustainability, reducing business travel, and encouraging the use of public transportation.

Looking Forward

Despite the challenges in reducing our carbon footprint, our commitment to environmental excellence remains strong.

By adhering to strategic objectives and seeking innovative solutions, we aspire to lead in the global technology sector, demonstrating that environmental sustainability and business success are mutually supportive.

Akkodis Global is owned by the Adecco Group (TAG). TAG has implanted comprehensive ESG initiatives. Discover more about our sustainability efforts and how we measure progress at [The Adecco Group's Sustainability Metrics & Reporting](#).

Key Performance Indicators for our ESG initiatives



2025: Reach CO2-neutrality



2023: Sustainability conduct audits at largest suppliers in Taiwan



25% Women in Workforce by 2025



40% Women in Management by 2025

Representation in the Workforce

In the software development field, the representation of women in management positions is significantly lower than their overall participation in the workforce. Despite improvements, women still hold a smaller proportion of leadership roles in large tech firms, approximately one-fourth, even as their numbers in technical and leadership roles gradually increase (Deloitte Insights, 2023). This discrepancy remains a challenge despite ongoing efforts to enhance gender diversity.

Current Status and Challenges

Recent data shows a slight improvement in our overall female representation, increasing from 22% to 24% within a year, approaching our target of 25%. Despite this progress in workforce diversity, the proportion of women in management roles is decreasing, posing challenges to achieving higher representation in leadership. This indicates ongoing struggles in not only recruiting but also in promoting women into managerial positions in the tech sector.

Our key action points to reduce our emissions



Using our purchasing power



Mapping emissions



Joint Offsetting platform



Ramping up internal communication



Reduced AIR TRAVEL



Connecting With the right partners



Carbon Budgets



Prioritising Communicating Green projects

Akkodis Nordics' ambitions & achievements to date

Our Ambitions

Environmental (E)

- Complete 100 sustainable projects.
- Switch all subsidiaries to renewable energy providers.
- Advance our group-wide sustainability strategy.
- Broaden the reach of our circular economy projects to additional clients.

Social (S)

- Achieve a gender balance of 25% women across the organization.
- 40% women in management in 2025
- Utilize exchange opportunities within Akkodis Global to enhance skills and collaboration.
- Enhance our work culture to be more international and appealing, supporting our recruitment initiatives.
- Increase initiatives to encourage physical activity and decrease sick leave.

Governance (G)

- Conduct surveys and audits on sustainability practices with suppliers, particularly in Taiwan during 2023.
- Publish a due diligence report by June 30, 2023, following OECD guidelines.
- Revise the Code of Conduct and Supplier Conduct Principles.
- Develop a Human Rights Policy.
- Gain customer endorsement for the updated Supplier Conduct Principles.
- Launch an ESG and human rights online learning program.
- Enhance accessibility of the complaint and whistleblower systems.

Our Achievements

Environmental Initiatives

- Drafted CO2 neutrality roadmaps for all subsidiaries
- Conducted two workshops on circular economy practices.
- Enabled staff to offset their carbon footprint via an offsetting platform.
- Expanded the use of renewable energy across our facilities.
- Transitioned to a lower fossil fuel fleet within our subsidiaries.
- Installed solar panels at specific German sites for server energy.

Social (S)

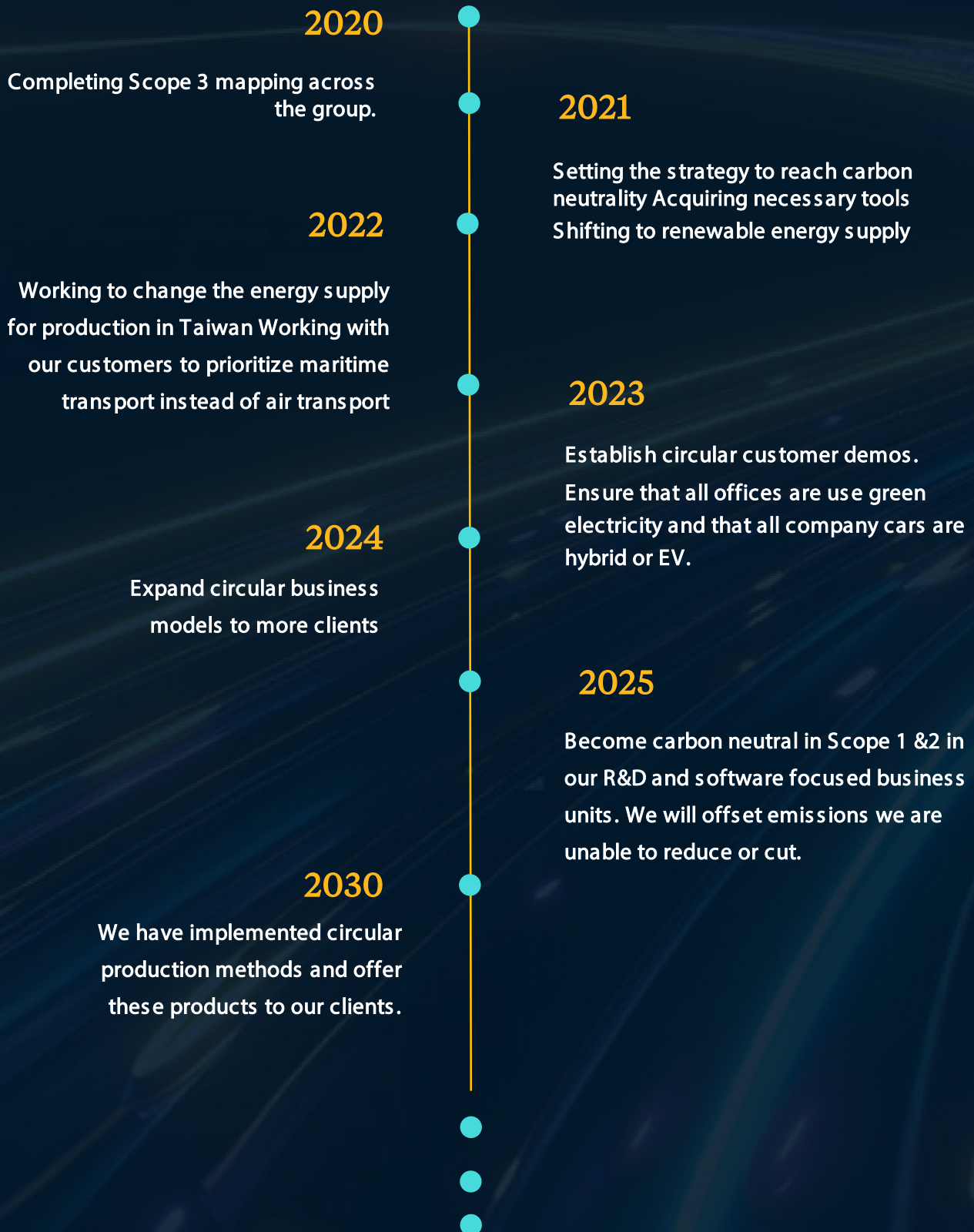
- Achieved gender balance of 24%
- 22% women in management positions
- Launched an internal learning program on group level on environmental, social, and governance matters.
- Continued a learning program on mental and physical health

Governance (G)

- Survey suppliers on sustainability.
- Audit top Taiwanese suppliers in 2023.
- Publish an OECD-compliant report by June 30.
- Updated Code of Conduct in place.
- New Human Rights Policy enacted.
- Supplier Conduct Principles revised.
- Plus, we've earned a sustainability score from Ecovadis since 2024.

Reshaping our business

Roadmap to 2025 and 2030



Akkodis Globals Role in Sustainable Progress

Akkodis global harnesses technology to tackle global challenges, aligned with the UN's SDGs, aiming for a sustainable and inclusive future.



Education (SDG 4)

Through initiatives like the Akkodis STEM Academy and educational partnerships, we're bridging the digital divide and enhancing digital literacy to prepare the next generation for the technological world, focusing on quality education and STEM promotion for underrepresented groups.



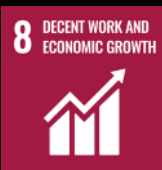
Gender Equality (SDG 5)

Our Women in Tech programs support and empower women in the industry, nurturing an ecosystem rich with diversity and innovation.



Clean Energy (SDG 7)

We're involved in promoting renewable energy and increasing energy efficiency, contributing to a sustainable energy transition.



Economic Growth (SDG 8)

By connecting talent to opportunities in the tech sector, we're promoting decent work and economic growth, and advocating for continuous learning and innovation.



Innovation & Infrastructure (SDG 9)

Akkodis Global leads in developing resilient infrastructure and advancing digital transformation to boost efficiency, sustainability, and connectivity.



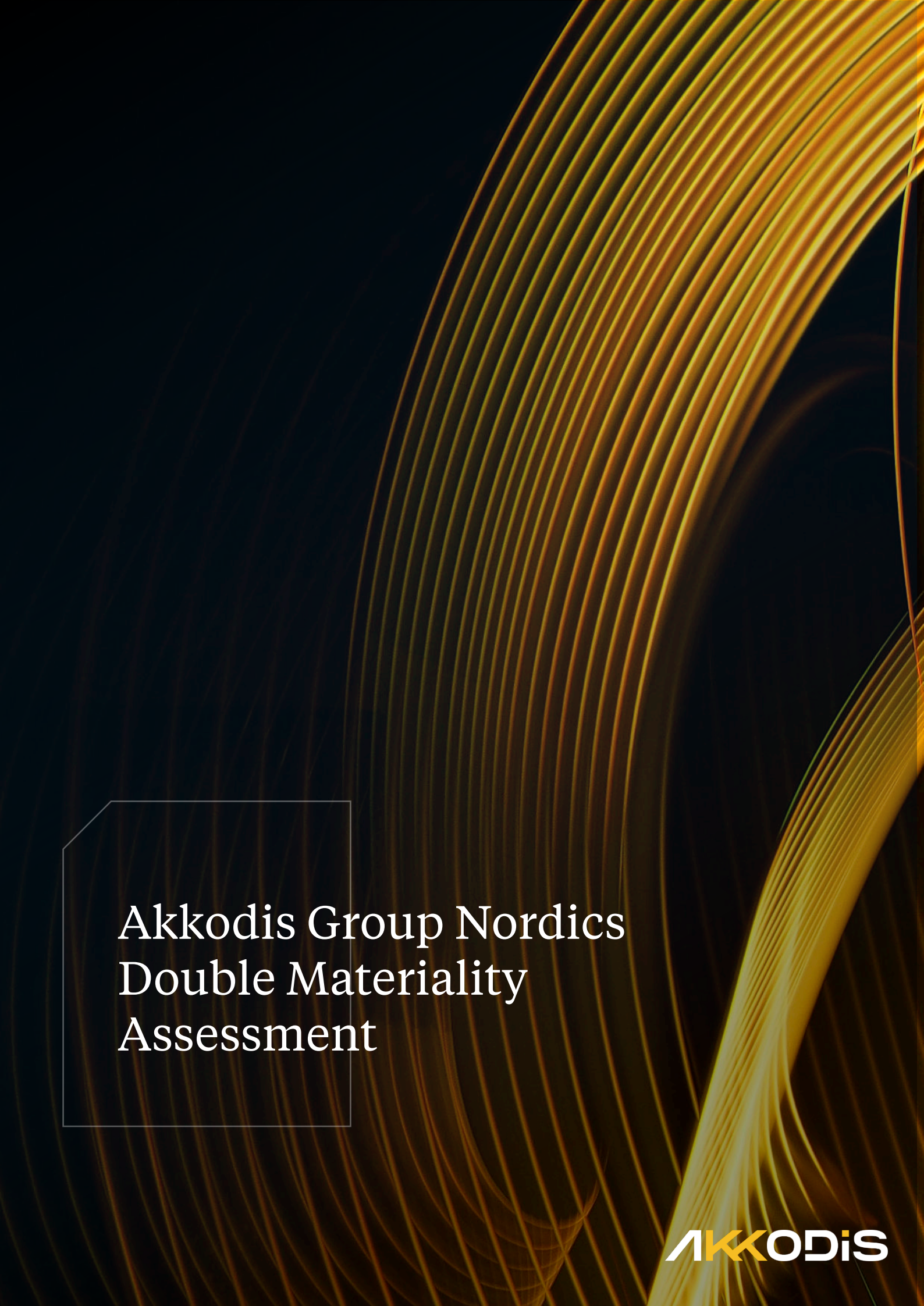
Sustainable Cities (SDG 11)

Our smart city projects aim to enhance urban resilience, promote sustainable development, and improve urban life quality.



Climate Action (SDG 13)

Committed to fighting climate change, we focus on cutting carbon emissions and fostering energy-efficient and sustainable industrial practices for a healthier planet.



Akkodis Group Nordics
Double Materiality
Assessment



Akkodis Nordics' Ongoing Stakeholder Dialogue and Double Materiality Assessment

Increasing the Stakeholder Engagement at Akkodis Nordics

Since 2020 Akkodis Nordics has been engaging with key stakeholders to refine our ESG approach, utilizing interviews, meetings, surveys, and collaborations in networks and industry work projects. While 2022 did not feature stakeholder interviews, an ongoing dialogue persisted about their concerns.

In 2024, we've taken a significant step by conducting our first double materiality assessment, involving key stakeholders to identify material topics impacting both our business operations and our wider societal impact. This robust process has informed our strategies and reinforced our commitment to the UN SDGs.

Getting to know Akkodis Nordics' Key stakeholders

Our critical stakeholders include our **employees, prospective talent, clients, suppliers, and our parent company The Adecco Group**, as well as authorities, local communities, research bodies, and industry organizations—all integral to our sustainable development journey.

Our highly skilled employees are at the forefront, closely intertwined with our policy-making and activities. Being fully owned by Akkodis Global, we align our ESG efforts with our shareholders' expectations.

Clients have a direct economic impact and influence our ESG priorities. Regular ESG-specific surveys and subsidiary-level customer surveys maintain this crucial dialogue. Similarly, our operations influence local communities through job creation, tax contributions, and environmental footprint.

Suppliers, vital to our operations, have been invited to join our journey towards net-zero emissions, opening channels for collaborative strategies in line with our ESG goals. The adoption of the cloud-based Integrity Next platform facilitates comprehensive ESG risk management and compliance across our supply chain.

Stakeholder Dialogue Approach

Our stakeholder dialogues are a cornerstone in building relationships and understanding the communities we impact. They are crucial for risk management and align with the GRI Standards, assisting us in pinpointing and addressing our most significant impacts. The dialogues, led by the Communications Department, involve conversations with stakeholders, including employees, customers, shareholders, and suppliers, forming the foundation of our sustainable initiatives.

Results from our 2024 Double Materiality Survey

Our first materiality analysis, completed in 2021, essentially confirmed earlier assessments of our most significant sustainability aspects. Initially, the impact of various sustainability aspects on the external world was assessed. Subsequently, the analysis identified the sustainability aspects important to Akkodis Nordics' (Formerly Data Respons') stakeholders—specifically, **employees and clients**—and what these stakeholders value when making business decisions.

As the **Corporate Sustainability Reporting Directive (CSRD)** increases in importance, we proactively conducted a **double materiality survey** for the first time in 2024. This survey included both the financial and non-financial materiality of our ESG topics. Please see the 2024 Matrix with the updated results from that survey.

Impacts may change over time as both our activities and the societies in which we operate evolve. For this reason, we continuously assess our surroundings and identify our impacts, engaging with our relevant stakeholders through surveys and open dialogue.

The topics identified in 2021 continued to represent our most material ESG topics in 2024. Moving forward, we will continue the evaluations of these material topics and their impacts. We plan to act specifically on those topics that have shown to rank high on both financial and non-financial materiality.

Definition of Financial and Non-Financial Materiality

- **Financial Materiality:** Key financial performance and investment information.
- **Impact Materiality:** Company's wider environmental and societal effects.

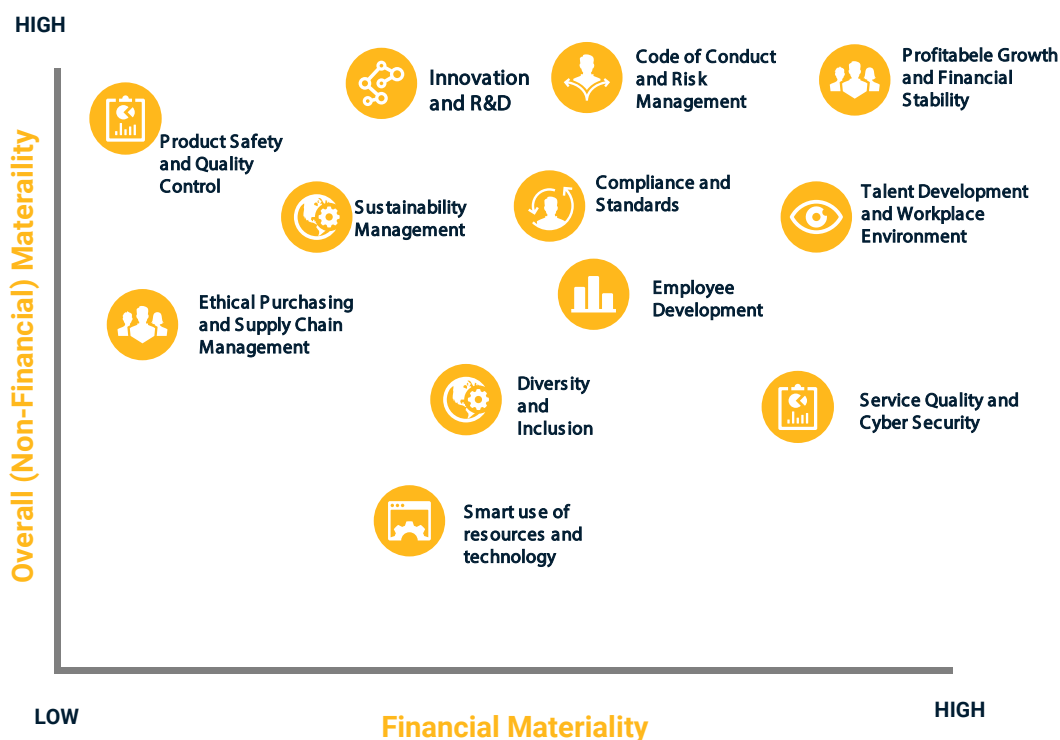
Our most important stakeholders

- **Employees:** Including local and international works councils.
- **Clients:** Covering existing clients, potential clients, and our clients' ecosystems.
- **Business Partners:** Encompassing alliances, suppliers, and other partners.
- **Civil Society and Communities:** Involving local communities, academics, thought leaders, think tanks, local authorities, regulators, legislators, EU.

Key Assessment Topics to be rated in the materiality survey

- **Corporate Governance:** Integrity in leadership, diversity, fair compensation, financial health, ethical practices, and risk management.
- **Ethics:** High ethical standards, human rights, and environmental law compliance.
- **People:** Engagement, well-being, skill-building, diversity, and inclusion.
- **Client and Stakeholder Engagement:** Quality service, strong stakeholder relationships.
- **Data Security:** Commitment to data protection and cybersecurity.
- **Innovation and Technology:** Sustainable, efficient technological progress.
- **Social Impact:** Accessible, ethical technology for all.
- **Supply Chain and Environmental Responsibility:** Climate advocacy, ethical procurement, sustainable practices.
- **Product Responsibility:** Product safety, quality, and customer well-being.

2024 Double Materiality Matrix



In 2021, our first materiality analysis confirmed the company's key sustainability aspects. We assessed the impact of these aspects on the external world and identified what our stakeholders—employees and clients—value in business decisions.

In 2024, we conducted our first double materiality survey to meet CSRD requirements. This survey evaluates the financial impact on the company and the overall impact on stakeholders and the environment.

After analyzing competitors and previous findings, we identified the most important topics for stakeholders to rate.

The results

- **Sustaining Profitable Growth and Financial Stability:**
Rated highly in both financial and non-financial impact.
- **Code of Conduct and Risk Management:**
Considered critical, highlighting the emphasis on ethics and strategy.
- **Compliance and Standards:**
High ratings in human rights, environmental regulations, and health and safety standards.
- **Talent Development and Workplace Environment:**
Highly important, with a focus on skills development and a positive work environment.
- **Diversity and Inclusion:**
Recognized as important, though slightly lower in ratings.
- **Service Quality and Customer Relations:**
Rated highly, underscoring their importance.
- **Data Privacy and Cybersecurity:**
Highly rated, reflecting growing digital priorities.
- **Innovation and R&D:**
Crucial for growth, with some variability in responses.
- **Resource Use and Technology Access:**
Considered important, with consistent high ratings.
- **Employee Development:**
Highly rated, focusing on continuous improvement and adaptability.
- **Ethical Purchasing and Supply Chain Management:**
Important, with some variability in responses.
- **Sustainability Commitment:**
Important, reflecting the emphasis on sustainable practices.
- **Product Safety and Quality Control:**
Rated highly for non-financial impact.

Overall, the survey shows a strong emphasis on ethics, risk management, compliance, talent development, and sustainability, recognizing their importance to Akkodis Nordics' financial and non-financial impacts.

Environmental



E

Emission Mapping

Over the last five years, Akkodis Nordics has made strides in understanding and reducing our emissions, achieving significant reductions in Scopes 1 and 2. Our strategic shift to renewable energy, reduced air travel, and adoption of electric vehicles has been effective in lowering our carbon footprint. Additionally, we've refined our emissions measurement methods for greater accuracy.

In 2023, we've seen an uptick in emissions. The lingering effects of COVID-19 from 2020 to 2022 suppressed business activities, but in 2023, operations have normalized, leading to increased customer demand and shipments. Compounded by the necessity of air travel due to global conflicts, our emissions have consequently increased.

Our ongoing efforts to refine Scope 3 emissions mapping are aimed at capturing a complete picture, although we recognize there are still gaps. Our R&D subsidiaries maintain lower emissions from software consultancy, in contrast to our Solutions sector, which, due to its hardware production and reliance on air freight, has a more substantial environmental impact.

Method GHG Protocol Standard

Our carbon footprint and environmental impact are certified by the third-party auditor Cemasys, adhering to the widely recognized GHG-protocol standard. This report's GHG emissions calculations are derived from Akkodis Nordics' operational data, such as travel, energy use, and equipment procurement, using established emission factors from global databases.

Emissions are categorized as follows:

Scope 1:

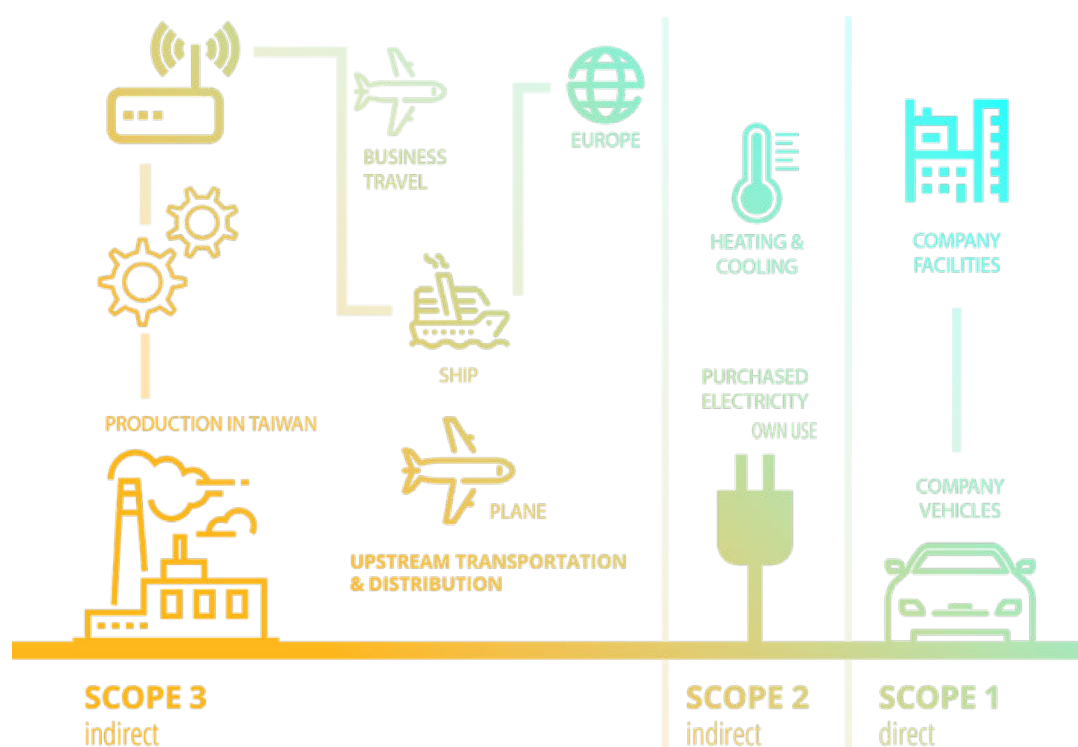
Direct emissions from the fuel used in our company vehicles.

Scope 2:

Emissions related to the energy consumption for our offices and storage facilities.

Scope 3:

Emissions from purchasing services and products, travel, transportation, and digital infrastructure.



An update on our Emissions Reduction Journey

We addressed Scopes 1 and 2 initially. However, Scope 3 presents more challenges than ever. This is largely due to heightened uncertainty and instability in Europe and the Middle East, prompting many of our customers to opt for air freight as their preferred mode of transportation for their products.

Technology Production and Emissions

Akkodis Nordics, through recalibrated scope 3 emissions calculations and guidance from Cemasys, reduced emissions significantly in 2022. However, in 2023, emissions increased to 8,700 tons CO₂e. This surge is attributed to a rise in customer demand and a higher volume of orders, necessitating more frequent technology shipments predominantly by air due to disruptions in the Suez passage and regional conflicts.

Transportation and Product Distribution

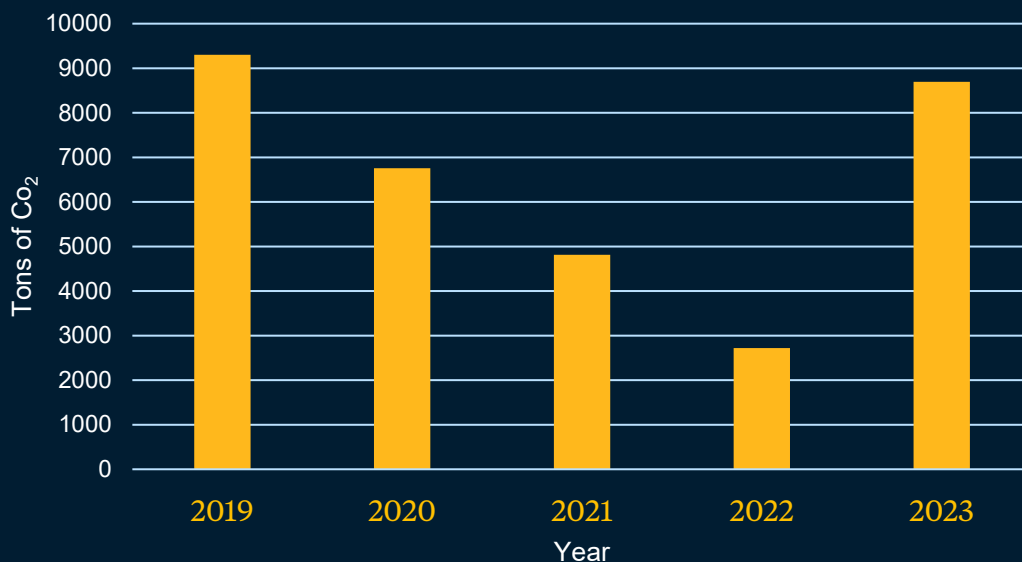
Logistics, representing 19% of our emissions, continue to focus on improving the efficiency of our technology product distribution from Taiwan to Europe.

Business Travel and Commute

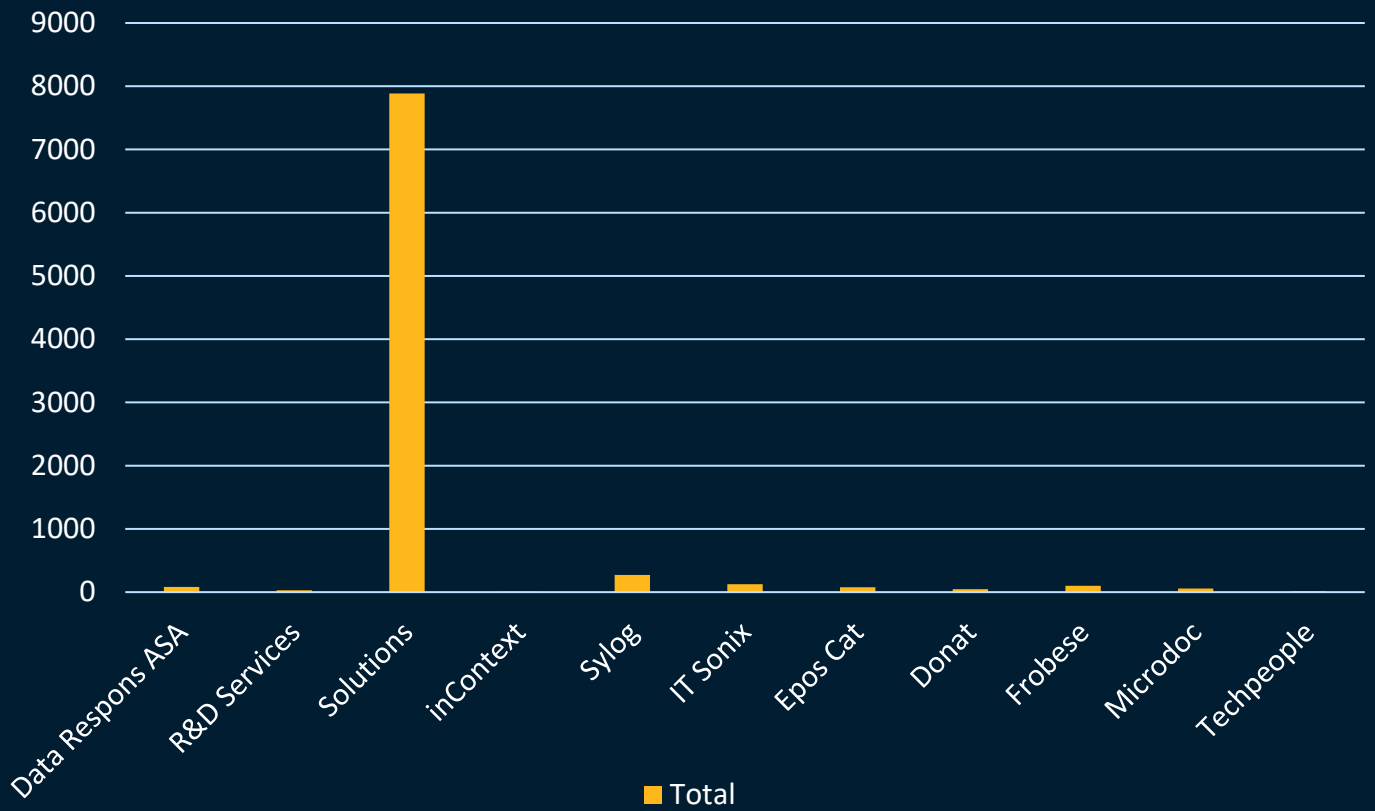
Business travel accounts for a substantial 25% of emissions, with an emphasis on digital meetings and carbon-offsetting for unavoidable flights. Employee commuting contributes 7% to our emissions footprint, with a push towards sustainable transportation choices. Akkodis Nordics advocates for climate neutrality in infrastructural expansions.

Despite the challenges faced in 2023, we remain committed to environmental responsibility in all operational facets.

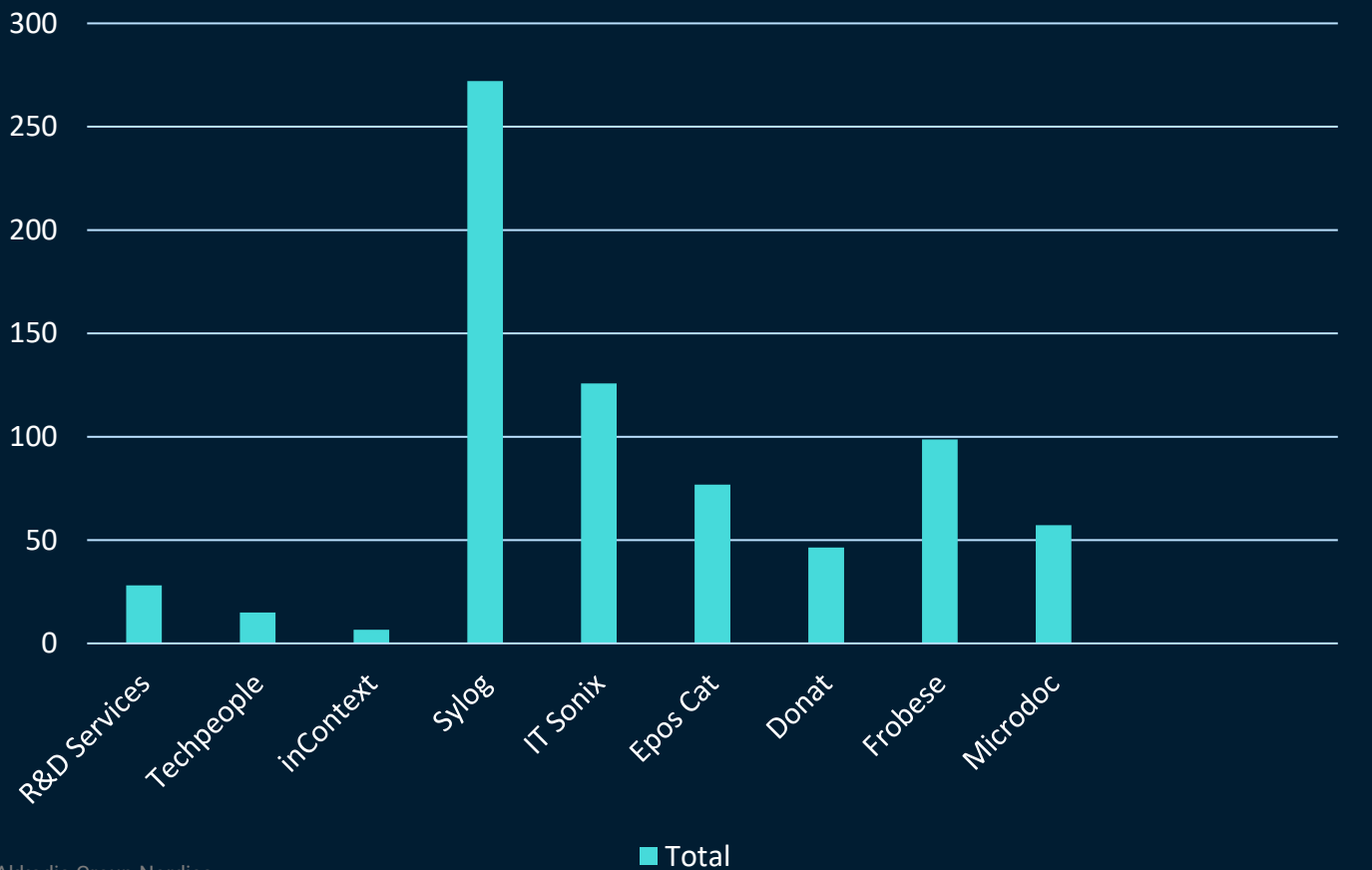
Emissions 2019 -2023

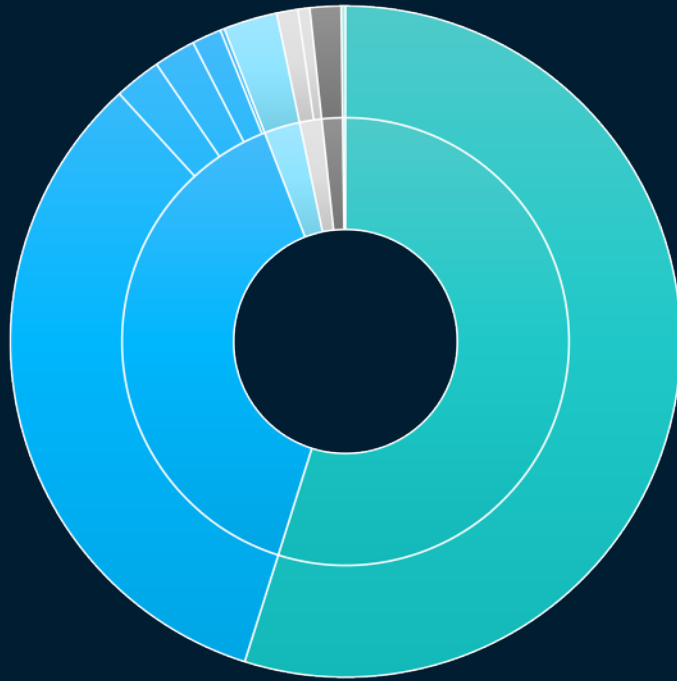


Emissions per Company



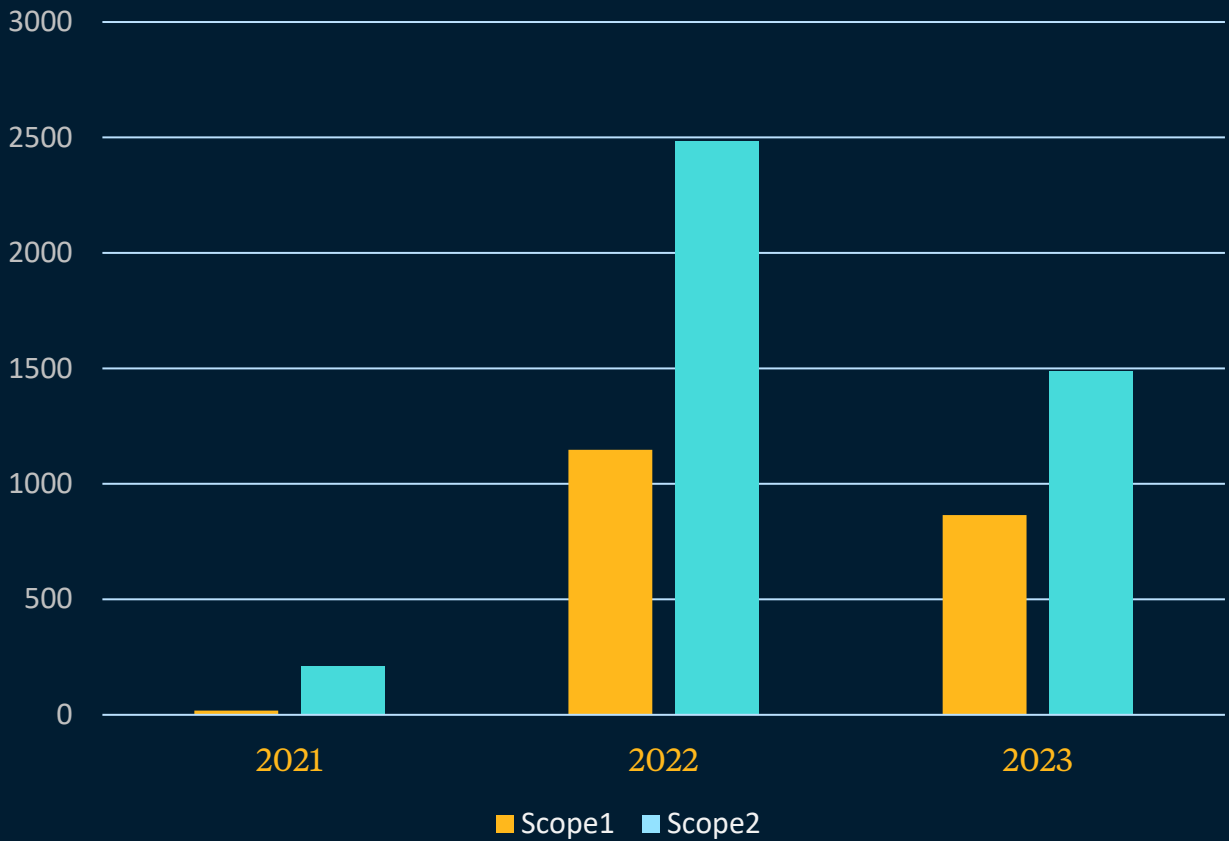
Emissions without Solutions





■ Scope 1 ■ Scope 2 ■ Scope 1 ■ Scope 3 ■ Scope 2 ■ Scope 3

Annual Energy Consumption (MkWh)





Targeting Immediate Gains: Enhancing Energy and Material Efficiency

We have had a significant positive impact on the environment through our energy use. Consequently, we have switched to 100% renewable energy for purchased electricity in all our offices.

Further, we have an ongoing dialogue and are researching possibilities for renewable energy sources for production of technology in Taiwan.

Material Stewardship at Akkodis Nordics

Despite our software-centric operations, we commit to full transparency in material consumption and waste management.

Waste Mapping at Solutions Subsidiary

- Paper/Cardboard
- Plastics
- Metals
- Wood (Residual Waste)
- Electrical/Electronic Waste

Recognizing our role in the global supply chain, we have instituted a robust conflict minerals policy, upholding ethical sourcing practices.

- Ensure procurement excludes conflict minerals.
- Engage in transparent discussions about conflict minerals with stakeholders.
- Encourage partners to eliminate conflict minerals in their supply chains.
- Require comprehensive disclosure of mineral usage from our partners.
- Oblige partners to inform their networks about the prohibition of conflict minerals.

Learn more about The Adecco Group's environmental policy by accessing the following document: [Environmental Policy](#).

Enabling People & Causes



Cultivating a **Healthy** & **Safe** Work Environment

12,7%

Turnover
In 2023

24%

Women
In 2023

3,3%

Sick leave

23%

Women in
leading positions

Employee Well-being

We are committed to employee health and well-being, recognizing that a robust working environment contributes to reduced sick leave, employee satisfaction, and enhanced performance—key elements of our high-performance culture.

Local Governance

Given the diverse needs of our subsidiaries, each is tasked with establishing its own working environment committee or appointing safety representatives to address their specific requirements.

Health and Safety Measures

Our primary health risks include repetitive strain injuries and stress-related disorders. We promote an active culture that encourages movement and varying work postures. To combat stress, we nurture an open, communicative culture and provide occupational health services tailored to individual needs, along with ergonomic tools. Notably, there were zero work-related injuries reported within the Akkodis Nordics group in 2023.

In 2022, the company experienced a slight increase in turnover, traditionally fluctuating around 15%, while sick leave significantly dropped from 5.9% to 3.5%.

Diversity and Inclusion

Diversity in gender and ethnicity is a competitive edge we continually strive for. Despite the challenges in the tech industry, efforts are ongoing to inspire young engineers, particularly women, to enter and lead in this field. Our diversity initiatives are integral to our culture, extending as we expand to include more companies, nationalities, and cultures.

Our Code of Conduct enforces fair employment, diversity, and zero tolerance for discrimination, harassment, or bullying. Incidents are promptly addressed, and adherence to these standards is mandatory across the group.

Gender Representation Progress

In 2023, the percentage of women in the workforce modestly increased from 21% to 24%. However, women in leadership positions decreased from 32% to 23%, attributed to more accurate data management rather than a decline in female leadership.

Reporting Requirements in Norway

In 2020, Norway mandated companies to promote workplace equality and prevent discrimination. Larger firms with over 50 employees must also report on gender disparities in pay, leadership roles, parental leave, and involuntary part-time work. Our Norwegian subsidiary, Data Respons R&D Services, complies with these rules, and we're looking to extend this practice across our European branches, seeing value in this exercise beyond Norwegian mandates.

Parental leave data is limited due to a high number of junior developers and low instances of leave. In 2022, there were no part-time or temporary employees.


Salary Equality:

Salaries are determined by individual roles, skills, performance, and experience, not by gender or other discriminatory factors. Differences in pay reflect educational background, experience, and working hours. In 2022, our data shows that women engineers are paid equally or better than their male colleagues, with discrepancies at senior levels due to differences in experience.

AVERAGE PAY BETWEEN WOMEN AND MEN R&D Services 2023

	2023			2022			2021		
Title	Women	Men	Sum	Women	Men	Sum	Women	Men	Sum
Management	25 %	75 %	100 %	25 %	75 %	100 %	25 %	75 %	100 %
Specialist Dev Engineers	7 %	93 %	100 %	14 %	86 %	100 %	8 %	92 %	100 %
Senior Dev Engineers	14 %	86 %	100 %	10 %	90 %	100 %	10 %	90 %	100 %
Develop Engineers	6 %	94 %	100 %	4 %	96 %	100 %	6 %	94 %	100 %
Administration	100 %	0 %	100 %	100 %	0 %	100 %	100 %	0 %	100 %
Total+	10 %	90 %	100 %	9 %	91 %	100 %	9 %	91 %	100 %

	2023			2022			2021		
Title	Women	Men	Sum	Women	Men	Sum	Women	Men	Sum
Management	25 %	75 %	100 %	25 %	75 %	100 %	25 %	75 %	100 %
Specialist Dev Engineers	7 %	93 %	100 %	14 %	86 %	100 %	8 %	92 %	100 %
Senior Dev Engineers	14 %	86 %	100 %	10 %	90 %	100 %	10 %	90 %	100 %
Develop Engineers	6 %	94 %	100 %	4 %	96 %	100 %	6 %	94 %	100 %
Administration	100 %	0 %	100 %	100 %	0 %	100 %	100 %	0 %	100 %
Total	10 %	90 %	100 %	9 %	91 %	100 %	9 %	91 %	100 %



Cultivating a skilled and thriving workforce at Akkodis Nordics

At Akkodis Nordics we invest significant energy into attracting, developing, and retaining talented and creative colleagues. Our company culture and the collective expertise of our team members are pivotal components of our strategic focus, which emphasizes skill enhancement, innovative thinking, and long-term leadership development.

Dynamic Learning and Development

Employees at Akkodis Nordics benefit from diverse experiences across different industries, companies, and organizations. They have opportunities to engage across the entire IT spectrum and evolve through various roles. Most importantly, they grow daily through client projects, placing them at the forefront of the digital revolution. The depth and breadth of development opportunities at Akkodis Nordics are truly unique.

Decentralized Development Strategies

Given the unique expertise and needs of our subsidiaries, a one-size-fits-all approach to employee development is not effective. Therefore, we delegate the responsibility for crafting development plans to each subsidiary. This autonomy ensures that recruitment, onboarding, and ongoing development are tailored to align with our overarching values.

Subsidiary-Specific Initiatives

Several of our subsidiaries have established their own learning platforms and academies to provide tailored development opportunities. For instance, Frobes has its own academy, that provides various learning arenas for their employees. Our goal is to extend these opportunities to as many employees as possible in the near future.

International Collaboration and Skill Exchange

This year, we initiated an exchange program with Akkodis Australia, focusing on sharing skills and insights in data analytics and R&D projects. We are committed to expanding this initiative in 2023, enhancing our global collaboration and knowledge sharing.

Read more about benefits for our employees at [The Adecco Group here](#).

Our Commitment to Human & Labour Rights

Core Principle

Respecting human rights is integral to Akkodis Nordics' ethos and sustainability. We uphold fundamental human rights across our operations, supply chain, and community engagements, leveraging our influence to prevent abuses and promote human rights adherence.

Operational Approach

Our commitment is articulated through our corporate values and formalized in our Code of Conduct and Supplier Code of Conduct, both accessible on our website.

Protection and Promotion of Human Rights

Zero Tolerance Policy

We strictly prohibit bullying, sexual harassment, and any form of harassment.

Diversity and Inclusion

Our culture embraces diversity in gender, age, ethnicity, physical abilities, personality, skills, experiences, and backgrounds.

Right to Privacy

We respect personal data in accordance with GDPR regulations implemented into Norwegian law.

Freedom of Association

Every employee has the freedom to choose to join or not join a labor union.

Fair Treatment and Compensation

We operate without discrimination, ensuring fair treatment, and provide competitive salaries and benefits.

Equal Pay

We are committed to equal pay for equal work, irrespective of gender, cultural or other backgrounds.

Voluntary Employment

All employment is voluntary, aligning with the ILO Declaration.

Supplier Responsibility

Our Supplier Code of Conduct mandates suppliers to adhere to the same standards we set for our employees.

Learn more about our human rights principles in Adecco's code of conduct through the following resources:

[Human and Labour Rights Policy \(Approved December 18, 2022\)](#)

[Human and Labour Rights Position Statement \(Version December 9, 2022\)](#)

Governance Ensuring Professional Business & Conduct



Governance

Building trust through good corporate governance is key and part of the license to operate for every company. Akkodis Nordics continues to identify ways to improve on topics like transparency, supply chain management and professional conduct. With a growing number of companies, employees, locations, and customers it is very important to us that we continue to build a professional and responsible corporate culture.

Ethical guidelines

In 2019 we made a comprehensive Code of Conduct that was launched in 2020 together with an updated whistle-blower service. The Akkodis Nordics Code of Conduct is sent to every new employee when in their first week of work. Everyone is requested to read it and follow up with their supervisor if something remains unclear. The supervisor has the responsibility to follow up that the Code has been read and understood.

Also, we launched a Supplier Code of Conduct Principles in 2019 and have executed a supplier audit in Taiwan in early 2023. The Supplier Code of Conduct sets out the minimum standards in key areas including business ethics and anticorruption, as well as human rights, labor conditions and sustainability for Akkodis Nordics' suppliers. Failure to comply with these requirements may result in the termination of the business relationship.

Risks and opportunities

Ethical risks include for instance employee failure to comply with national regulations, Akkodis Nordics' Code of Conduct or employee involvement in corruption, bribery, or other irregularities. Such actions may damage the brand or lead to legal sanctions and fines. We do not have any operations in high- risk countries. Regardless, running a professional corporate culture is very important to us.



Whistle blowing

We are committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns, and report suspected violations. All employees, suppliers and partners can also use Akkodis Nordics' whistle-blower channel, where concerns can be reported anonymously.

Any anonymous alerts will be handled by the group top management through the whistle blower platform. In any case the alerts are about the top management the Board of directors will handle the alerts.

Link to the Whistle blowing channel:

<https://report.whistleb.com/en/akkodisnordics>

As an international company we strive to:

- Contribute to quality education in our communities
- Promote decent work throughout the value and supply chain
- Foster economic growth in our communities
- Strengthen local communities and institutions through capacity building on human rights and good governance



Data Security & Integrity

Cyber Security Awareness

It-security and cyber security awareness has probably never been more relevant, and it is very much a shared responsibility for everyone in the company.

Trusted research and cyber security reports state that human error is the major contributing cause in 95 % of all breaches. In other words, attentive, observant, and alert employees are instrumental in helping us stay safe.

Actions:

- Regular password check-ups by a third party
- Implemented multi-factor authentication
- Using cloud services that hinder to much data and information being stored locally
- Dedicating every October to raising cyber awareness
- Using internal events like hackathons to focus on IT security challenges and solutions
- Taking our own medicine by implementing our cyber awareness offerings internally, such as fake email campaigns, fake Wi-Fi hotspots and fake QR codes to train employees to recognize potential threats.

GDPR

Under the GDPR, Akkodis Nordics has firm legal requirements to protect against personal data breaches and specific timelines within which to report and communicate applicable breaches to affected personnel. The GDPR requirements extend to all vendors that we use to collect, store and process personal data on its behalf. Data security and integrity is managed at Akkodis Nordics through a combination of Group-wide and complementary daughter company policies and processes. Information security is managed within each subsidiary with oversight at Group level.

Actions:

- During the cyber security month in October, we ran our annual internal campaign educating employees on the latest cyber security trends and threats
- We have also carried out fake phishing campaigns where we sent fake phishing emails to our employees. This was done in order to train them on how to recognize and identify phishing threats
- In order to increase the employees' knowledge on data protection, we carried out online learning modules on personal data protection, how Akkodis Nordics manages personal data, and how to understand more about who to connect with on personal data protection.

Ensuring Compliance and Promoting Sustainability: Akkodis Nordics' Commitment to Norway's Transparency Act

Adherence to Norway's Transparency Act

Introduction to the Transparency Act

Effective July 1, 2022, Norway's Transparency Act mandates that large companies, both domestic and foreign, operating within and outside of Norway conduct due diligence assessments. These assessments, aligned with OECD guidelines, focus on human rights and decent working conditions throughout their operations, supply chains, and business partners. This initiative is designed to track and improve societal standards and includes continuous input from employees, partners, and suppliers.

Akkodis Nordics' Commitment to Ethical Standards

Akkodis is dedicated to upholding these standards, fostering cooperation with all business partners, including suppliers, contractors, consultants, and joint venture partners. Ensuring compliance with applicable laws and regulations is fundamental. All suppliers directly contracted with Akkodis Nordics are required to adhere to our Supplier Code of Conduct, as part of our commitment to using our purchasing power to drive positive changes throughout our value chain.

Risk Management and Oversight

Akkodis Nordics also exercises strict oversight over intermediaries such as agents, distributors, and resellers to manage risks and maintain our environmental and ethical standards. Ensuring that these intermediaries understand and comply with our Code of Conduct, especially regarding environmental impact and working conditions, is crucial. Our integrity due diligence processes are critical to ensuring that our partners' reputations and practices align with our high standards.

Learn More For more detailed information about our policies and initiatives, please refer to the Adecco Group's documentation on third-party conduct [here](#).

This version not only provides a clearer structure but also highlights the key areas of focus, making it easier for the reader to understand the scope and importance of the compliance efforts under the Transparency Act.

Ethics and Compliance

Overview at Akkodis Nordics

Anti-Corruption and Compliance

Akkodis Nordics commits to high ethical standards, strictly adhering to laws against corruption, bribery, and money laundering, in alignment with Norwegian guidelines. We enforce these policies across all subsidiaries, ensuring that no bribes or kickbacks occur in any dealings.

Employee Conduct and Protection

Employees must avoid any actions that could influence business decisions improperly, including the giving or receiving of gifts or bribes. Non-compliance is addressed as a serious disciplinary matter. Protections are in place to safeguard employees who reject participation in corrupt activities, ensuring no retaliation.

Political Neutrality and Human Rights Commitment

We maintain political independence and do not support political organizations. Our human rights policy, based on the Universal Declaration of Human Rights and the UN Global Compact, commits to non-discrimination and upholds dignity across all operations. This includes regular supplier audits to ensure adherence to these standards.

Transparency and Due Diligence

Compliance with the Transparency Act mandates thorough due diligence assessments to verify human rights observance and proper working conditions within our operations and the wider supply chain, according to OECD guidelines.

Enhancing Compliance Framework

- **Whistleblower Protections:** We have clear policies to protect whistleblowers, encouraging the reporting of unethical behavior without fear of reprisal.
- **Training and Awareness Programs:** Regular training on ethics and compliance ensures that our employees understand and can act according to our ethical standards.
- **Monitoring and Enforcement:** We employ rigorous monitoring and enforcement mechanisms to ensure compliance and address any infractions.
- **Stakeholder Engagement:** Active engagement with stakeholders, including discussions with suppliers and customers, particularly in international locations like Taiwan, reinforces our commitment to ethical practices.
- **Ethical Sourcing:** We prioritize ethical sourcing and transparency in our supply chain, essential for maintaining trust and compliance under international standards.

For additional details, please refer to our parent company's Code of Conduct available here:

[Adecco Group Code of Conduct.](#)

Digital Engineering for a Smarter Future

Learn more about how we enable
sustainability through technology on

[Akkodis.com](https://www.akkodis.com)