

twoday



**Business**  
code of conduct

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# Code of **Conduct**

At twoday, we are committed to maintaining high ethical and professional standards in all our business practices. This Code of Conduct provides guidelines for the ethical and professional behaviour expected of all employees, contractors, and partners of twoday.

The purpose of this Code of Conduct is to ensure that all individuals associated with twoday:

- Comply with applicable laws and regulations
- Maintain high ethical and professional standards
- Promote a culture of integrity and responsibility

Please read carefully and bear in mind that each of us has a responsibility to incorporate these principles and values into our everyday work.

## **Questions or concerns**

We are committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns and report suspected violations. We take your questions and concerns seriously. We all have a responsibility

and must have the courage to speak up promptly about ethical questions or issues, and anything we believe, in good faith, to be a suspected violation.

If you have questions or concerns regarding the contents of this Code of Conduct or how to act on them, please do not hesitate to contact your People/ Human Resources contact and/or your leader or Managing Director.

## **Whistleblowing - Notification of Breach**

twoday encourages all employees to report if they observe behaviour that breaches these codes. If you detect or suspect a breach of this Code of Conduct, you should notify your leader immediately. twoday prohibits all forms of retaliation against employees who report or participate in an investigation into a possible breach of these codes.

If you fail to obtain a response to your notification or if you would prefer not to notify any of those identified above, you are urged to notify through the twoday Whistleblowing Channel.

# Comply with applicable laws and regulations

Each of us is expected to always comply with the legislation in the country where we work. Since twoday is an international company, legal requirements will vary.

You are naturally not expected to know all legal requirements, but it is important to have a close enough relationship to legislation in order to detect and recognise illegal behaviour in twoday. If you are in doubt about legal requirements, please consult with legal counsels before making a decision.

Below we have selected certain material legislation applicable to all twoday companies and employees. Please remember that this is not an exhaustive list of applicable legislation.

## Anti-corruption

You as a twoday employee shall always act in a fair and transparent way when taking action or making decisions on behalf of twoday. If a person demands, gives or accepts bribes to influence a decision or an action, it is perceived as corruption. Corruption is illegal and will be extremely damaging to twoday's reputation and trustworthiness.

twoday employees are committed to yearly training. In addition, our companies assess the risk of corruption in their businesses. Please read more in our Anti-Corruption Policy.

twoday prohibits all forms of corruption. twoday also expects its business partners, including suppliers, distributors, agents and joint venture partners, to abide by the same principles in their operations.

## Anti-money laundering

Money laundering occurs when someone makes money from criminal activity and then attempts to make that money appear lawfully acquired.

The purpose of money laundering is to be able to use the money acquired without revealing the crime committed. Money laundering is illegal. It is prohibited to use twoday's assets in money laundering, including our equipment and services.

Even though few of us will come across money laundering issues, be attentive to attempts to receive or make payments in cash or transactions otherwise involving unusual banking or payment arrangements. Suspicious transactions or incidents should be reported to the Chief Operating Officer.

## Fair Competition and Market Regulations

As an employee, you have a responsibility to understand and adhere to the anti-competition policy in order to reduce risk for twoday.

twoday is committed to competition that is fair and in accordance with all local, EU and international law. Such regulations seek to prevent corporations from weakening competition, thereby harming consumers and society through higher prices, less choice, poorer product quality and reduced innovation. Examples may be:

- Cooperation between two or more companies to restrict competition on pricing, divide markets between them, or limit technological innovation and development
- A single company using a dominant position in a broad or narrow market to impose unreasonable prices or limit production to hurt other companies in that market

On suspicion of breach of the anti-competitive policy, you are to immediately contact your leader, or use twoday's established [Whistleblowing Channel](#).



Below we have selected certain topics from our anti-competition policy applicable to all twoday companies and employees.

- We outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices.
- Stealing proprietary information or trade secrets that were obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited.
- Each employee and leader should:
  - Never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, blackmail, misrepresentation of material facts, or other illegal trade practice.
  - Never engage in price fixing, bid rigging (collusion in which bidders on a contract decide who should be successful in the tender, and then draft their bids accordingly), allocation of markets or customers, or similar illegal anti-competitive activities.
  - Understand that the purpose of minor and limited business entertainment and gifts in a commercial setting is purely to create goodwill and sound working relationships. It is not to gain unfair advantage with customers, vendors or government representatives.
  - Never accept a gift, in person or by a family member in a twoday setting, unless the gift (1) is not a cash gift and is in accordance with twoday's anti-corruption policy, (2) is consistent with customary business practices, (3) is of reasonable value, (4) cannot be construed as a bribe or payoff, (5) does not violate any laws, regulations or applicable policies of the other party's organisation, and (6) has been declared to your leader or with objective certainty is appropriate.

## Transparency and Financial Reporting

twoday will communicate relevant business information in full and on a timely basis to its employees and external stakeholders. All accounting and financial information, as well as other disclosure information, must be accurately registered and presented in accordance with laws, regulations and relevant accounting standards. twoday has established and maintains internal controls to ensure the accuracy of financial reporting and prevent fraud. Our financial statements are audited and reviewed by external parties to ensure their accuracy and completeness.



## Maintain high ethical and **professional** standards

### Conflicts of interest

Scenarios involving conflicts of interest may arise where personal relationships or financial interests overlap with your job responsibilities and loyalty to twoday. All employees should avoid situations that create, or appear to create, a conflict between the personal interest of you as an individual or employee and twoday's interests.

Remember, you have the responsibility to act in twoday's best business interest and to avoid conflicts. If you get information about a potential conflict of interest, you are obligated to report it. When in doubt, seek guidance from your leader.

#### **Examples of expected behaviour:**

- Avoid having interests outside the company in any business that competes with or provides services to companies within the twoday group, which could affect your objectivity in carrying out your company responsibilities.
- Avoid doing business on behalf of twoday with a close personal friend or family member.

## Gifts from business partners

Conflicts of interest can easily occur, or seem to occur, when accepting and giving gifts, entertainment or other business courtesies from/to a current or potential customer or business partner.

Infrequent gifts, business dinners or other business entertainment can be appropriate and important in business, as long as these are not excessive or appear as indecent due to their value.

Always seek guidance from your leader on whether a gift or business courtesy is necessary and appropriate.

## Cost Control

All employees are responsible for twoday's finances — not only the people in finance. This means that when entering into contracts on twoday's behalf, e.g. paying for a service, you should always think about how twoday's assets are spent, if the action is necessary, and whether it is good for twoday's business.

You are an important part of twoday's financing, whatever your role is in the company.

Remember to:

- Enter into agreements in accordance with your level of authority, twoday's best interest, and relevant policies.
- Use twoday's equipment with care and in a sustainable manner.
- When travelling on behalf of twoday, use public transport to the extent possible and always consider using technologies such as video conferencing for meetings, where relevant.
- When travelling on behalf of twoday, use common sense and follow local and Group policies. When booking hotels and buying meals, find affordable options.



## Confidentiality

At twoday, safeguarding confidential information is our topmost priority. We are dedicated to upholding the privacy of our partners, customers, and ourselves, and we vow not to exploit any confidential data. Our employees are obliged to adhere to the confidentiality clauses specified in their employment contract, and this obligation persists even after their departure from twoday.

By protecting private information concerning twoday and our customers, we can preserve our competitive edge and establish trust.

There is certain information that twoday wants you to safeguard and limit the distribution of to a smaller segment of people. To identify what information is confidential and what information can be freely shared please consider the guidelines and policies to help you identify, mark and treat this information.

The basic principle is that the author of information marks the information with a classification, if restricted access is needed, indicating how to store, transmit and process the information.

When you share confidential information, remember that it should only be shared with people who have the authorisation to access or receive it. Confidential information should only be shared on a need-to-have basis to avoid involving more people than necessary.

It is important that you keep confidential information safe, by ensuring you do not share it with family and friends, nor in public spaces such as public transport or social media. If you are working in a public space on a public network, your communication is easily intercepted.

Lastly, remember that your duty of not sharing non-public information extends beyond your core working hours and employment at twoday. Confidential information must be treated as confidential until it's no longer non-public.

### **Examples of confidential information:**

- Security information
- Detailed sales information
- Information about new products that are not yet public
- Personal and sensitive information
- Business strategies
- Contract information



## Safeguarding of Property, Information and Assets

At twoday, our success as a leading company in our field is attributed to our valuable assets such as innovative ideas, inventions, business strategies, and confidential information. These assets represent years of hard work and dedication and require utmost protection.

As an employee of twoday, you hold the responsibility of safeguarding these assets and confidential information. Your efforts in protecting them contribute significantly to maintaining our competitive edge and ensuring our continued success.

All resources, including physical, building, hardware, equipment etc., and non-physical resources, such as data processed, should only be used to enhance twoday's businesses. It is every employee's responsibility to protect our assets and resources from abuse and waste.

Your twoday mobile device, computer or removable storage with twoday- or customer-owned information must never be left unattended in public spaces.

## Data Protection

twoday continuously strives to safeguard our employees' and customers' privacy. twoday

acknowledges privacy as a fundamental human right, and views strong privacy routines as an important competitive advantage that builds trust in the market and will attract even more customers. All twoday employees and companies are given mandatory data protection training and are tied to a privacy resource.

twoday is committed to safeguarding the data we are entrusted with by our customers. The customer contract, including the data processing agreement (DPA), forms the lawful basis for twoday when processing our customers' personal data. twoday shall not process personal data in any manner or for any other purpose than authorised in the DPA.

Furthermore, twoday processes personal data about our employees as data controller during their employment, in order to facilitate fulfilment of the employment contract. twoday is equally committed to ensuring privacy in this regard.

To read more about twoday as a data controller, please see the [twoday Privacy Statement](#).

# Promote a culture of **integrity** and **responsibility**

A safe and healthy working environment is essential for you as an employee to perform your best and reach your goals. At twoday everyone shall be treated with fairness, respect and dignity. We do not tolerate any form of abuse, harassment, intimidation, bullying, degrading treatment or sexually offensive behaviour by or towards employees or others affected by our operations. All employees are responsible for contributing to an inclusive and respectful working environment. It is essential for twoday to strive to be a great place to work for all employees; regardless of background, life situation and various limitations.

## We value diversity and equal opportunities

Competent and motivated employees are vital to twoday. To attract and retain the range of talents needed to create success, twoday believes it is crucial to have employees with diverse backgrounds, experiences and skills. Diversity is essential for twoday's growth and development. In addition, a good working environment is important to enable you as an employee to perform your best.

## Employee Engagement Survey (EES)

Employee engagement is highly important in twoday and something that we monitor on a frequent basis through pulse surveys. Our surveys aim to shed light on work climate, as well as employees' wellbeing and general engagement. By participating, you make your leader aware of the working environment and influence change where needed.

## Health, Safety and Security

We encourage all employees to take part in organised safety and environmental work and actively cooperate towards the implementation of measures to create a satisfactory and safe working environment. Notify the safety representative or leader if you experience or are witness to any installations, policies, faults or defects that may involve danger to life or health.

## Drugs and Alcohol

twoday employees' health and safety are our top priority. We want to create a safe working environment for all our employees. Drugs or alcohol must be avoided if they lead to impaired performance, health issues, inappropriate behaviour, missing work engagement or deadlines, danger to the safety of others, or violations of the law.

Please remember, even when you are outside of our offices, you are still expected to use good judgement and will be responsible if your behaviour impacts performance, the brand or your working relationships. twoday has resources available to support and assist employees with substance abuse issues. If you want to learn more, we strongly encourage you to contact your leader or People/ HR representative.

## Representing twoday in public

### **Social Media**

Social media presents a valuable opportunity to connect with customers and potential employees, foster trust, and gather feedback. As representatives of twoday on social media, it is crucial to consistently project a positive image of our company and prioritise its best interests. How should we act on social media?

- Be honest and truthful, and stick to the facts.
- Always be polite, respectful and professional.
- Never speak badly about others, customers, employees, competitors, etc.
- Let your leader know if you detect negative comments about twoday on social media.
- Do not post confidential or financial information.
- If unsure, seek guidance before posting anything on social media.
- Never comment on potentially damaging incidents or negative publicity on social media.

### **Public Appearance and Press**

Public appearances on behalf of twoday shape the perception of twoday as a company. It is important to remember to represent twoday in the best possible way. This means that you should always be well prepared, professional and polite.

Before you represent twoday in public, e.g. participating in a panel discussion or giving a presentation at a public event, you need permission from your leader.

It is important that twoday is unified regarding any information that is released publicly about our company. To ensure there is an overview of what information is given and to whom, twoday employees should never talk to the press unless it is approved by either your Managing Director, the person responsible for PR on a country level, or twoday Group PR. In addition, if members of the press contact you, please redirect them to one of these people.



## Sustainability

twoday believes that all businesses and employees have a responsibility to minimise adverse impacts on the environment. Sustainability is therefore a critical component of our code of conduct. It requires us to consider the long-term impacts of our actions and make decisions that balance economic, social, and environmental concerns. In our code of conduct, sustainability means that we must prioritize ethical and environmentally-friendly practices, minimize our carbon footprint, and protect natural resources. This includes adopting sustainable sourcing practices, reducing waste, and promoting renewable energy. By prioritizing sustainability in our code of conduct, we would like to show our commitment to creating a better tomorrow for both people and the planet, while also setting a positive example for others in the industry.

### **How can I contribute?**

- Reduce nonessential business travel when possible, especially by air, by using technologies such as video conferencing. When business travel is deemed essential, train or bus travel shall always be preferred over air travel if the difference in total travel time is not unreasonably different for travel door to door.
- Minimise the creation of waste. By prolonging the lifetime of hardware, such as computers, screens and phones, to the extent possible, we can significantly reduce emissions and the consumption of valuable resources.
- We encourage all employees to use public transport to the extent possible when travelling, and to consider more sustainable options, such as biking or walking, in the daily commute to and from the workplace.
- Always avoid creating food waste, and when possible, consider increasing the share of more climate-friendly, plant-based food options, e.g. when planning business events.
- When making business decisions on behalf of twoday, always take into account the impact this may have on the environment. Such decisions can be related to procurement, web hosting, travel — and many other areas.

We **create** a better tomorrow  
through **technology**