

job&talent

JT Code of Conduct

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Opening statement

Job&talent is a global organization, with a talented and diverse team. Our priority is to enable every single employee to be the best version of themselves, by ensuring that everyone feels safe, included and proud to be part of this organization.

Our Code of Conduct was developed to inspire the actions we take and the decisions we make by expressing our collective and individual commitment to integrity and good judgment, providing practical guidance on how we should keep accountable and act with integrity at all times.

As a business, we have responsibility for hundreds of thousands of people, and ethical behavior is more than just compliance with the law - it is ingrained in our DNA. From our relationships with colleagues and workers, to clients and investors, our expectation is that you will always put fairness, equity, justice, and integrity at the heart of everything you do.

Job&talent's reputation as an employer and partner of choice depends on all of us. With this Code of Conduct, we expect to reinforce even more the importance of being a highly ethical team trusted by everyone.

I invite everyone to read it carefully and apply it in the spirit of contributing to the common purpose. Let it guide you to make honest and fair decisions, as well as comply with the laws and policies that apply to our conduct. If you have any questions regarding the contents of the Code of Conduct, please reach out to your manager or contact the People & Culture and/or Legal Departments.

Thank you,

Juan & Felipe

Co-CEOs at Job&talent

This Code of Conduct is a living document, subject to change over time due to business requirements, laws or regulations changes.



1. ABOUT THIS CODE OF CONDUCT AND ETHICS

1.1 The purpose of this code of conduct and ethics (Code) is to set out clearly what Job&talent's values are in the workplace, and how these shape our company and guide employee decisions. The Code is built on our principles, which are beliefs that we hold deeply and represent what we stand for:

- **Respect for the individual:** we treat people with dignity, lead by example, and listen to each other. We seek and embrace differences in people, ideas and experiences.
- **Give all employees a voice:** we believe in a culture of trust where we can speak up when something is not right, we are never afraid to propose and defend new ideas. We seek a continuous feedback culture that helps our employees thrive.
- **Trust with our customers and clients:** we place our customers and clients at the centre of everything we do, constantly looking for new alternatives to get better results.
- **Act with integrity:** we are humble, honest, fair and objective.
- **Strive for excellence:** we are a high-performance team and expect the best from ourselves. We own our work and results. We are continuously raising the bar and driving impact, making decisions based on data.

1.2 We operate in many countries around the world and the complexity of local laws and customs may require additional guidance that is more specific than what is provided in our Code. Whenever there is a difference between local requirements and this Code, apply the strictest standard, and do not follow customs or apply practices that would violate this Code.

2. WHO THIS CODE APPLIES TO

2.1 This Code applies to all persons working for us or any group company, including employees at all levels, directors and officers. The Company means any company, partnership or other entity controlled by, controlling or in common control with, Job and Talent Holding, Ltd. or any of its parents, subsidiaries, associated or affiliated companies.

2.2 The policy is also applicable to agency workers, seconded workers, volunteers, interns and individual temporary or fixed term contractors, wherever located.

2.3 We reserve the right to amend this policy at any time.



3. WORKPLACE ENVIRONMENT

Diversity, equity and inclusion

- 3.1 Living our value of Respect for the Individual starts with valuing diversity and inclusion. We believe having employees with different backgrounds, styles, experiences, identities, and opinions make us a better company.
- 3.2 Job&talent is an equal opportunities employer and shall not discriminate in any way and in any characteristic protected under applicable local laws or any other than the worker's ability to perform the job subject to any accommodations required or permitted by law.
- 3.3 Among others, Job&talent shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement or any employment practice based on age, physical or mental disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ancestry, ethnic or national origin, religion or belief, conviction or opinion, sex or sexual orientation, gender identity, disease or health condition, serological status and/or genetic predisposition to suffer pathologies and disorders, language, socio economic status or any other personal or social condition or circumstance, or/and military/veteran status. For more information, please see the Diversity, Equity and Inclusion Policy.

Discrimination, harassment and bullying

- 3.4 We are committed to providing a work environment free from harassment, intimidation and threats or acts of violence. Any harassment, including sexual harassment or treatment based on a protected characteristic, will not be tolerated. We all have a responsibility to report any such conduct and lead by example. For more information, please see the Anti-harassment and Bullying Policy.
- 3.5 We are a global company and believe that our diversity is a source of strength. Mutual respect and tolerance are fundamental to how we work. We follow the applicable employment and employment laws where we do business, including wage & hour, immigration, collective-bargaining, anti-discrimination, and similar employment rules.

Health and safety

- 3.6 We all have a right to work in a safe and healthy environment. Unsafe practices can lead to serious consequences.
- 3.7 We are committed to the wellbeing and safety of ourselves, our colleagues and anyone doing business with us by providing a healthy and safe environment. We have workplace standards that meet all legal requirements in the countries in which we do business, and we expect our employees to comply with them.
- 3.8 All employees should make sure they follow the same high standards for safety and health that we do and are comfortable with the work they have been asked to carry out where it involves a risk to health or safety.
- 3.9 If you ever witness or suffer an accident, or see unsafe conditions, report the situation immediately. You have the right to report any work-related injury or illness to the Company



without any retaliatory action for doing so. Please contact the People & Culture Department in your jurisdiction as soon as possible.

Workplace violence

- 3.10 Our employment standards are high and global. We are committed to providing a work environment free from all types of harassment, intimidation and threats or acts of violence. We will not tolerate any form of workplace violence and will take any allegations extremely seriously.
- 3.11 If you believe you have been subject to acts of violence, or have witnessed any conduct of this type, please contact the People & Culture Department in your jurisdiction as soon as possible.

Drugs and alcohol

- 3.12 Job&talent has a zero tolerance policy about drugs and alcohol. The consumption of alcohol and the use, possession, sale, purchase or distribution of illegal substances on company premises or during working hours is strictly prohibited.
- 3.13 Disciplinary action, up to and including termination and/or legal proceedings, may result from any failure to comply with the above.

4. BUSINESS PRACTICES

Conflicts of interest

- 4.1 We, and you, have an obligation to do what is best for our company. That includes avoiding any interest, influence or relationships that may create a conflict of interest, and making decisions independently of personal interests.
- 4.2 A conflict of interest occurs when personal interests interfere with or may appear to interfere with, your work at the Company. While we can't list every circumstance, it's important to know and avoid the common situations that could create a conflict or the perception of a conflict. Outside employment, financial investments, gifts and entertainment, and personal relationships are areas where conflicts can arise.
- 4.3 All employees should disclose promptly any personal or professional interests that might reasonably be perceived to conflict with the best interests of the company.
- 4.4 All employees should avoid any external engagements or activities that may interfere with our responsibilities to the company or harm the company's reputation.

Bribery and corruption

- 4.5 Bribery and corruption refer to giving or offering money, goods or other forms of reward to a recipient to obtain an unfair or improper advantage.
- 4.6 At Job&talent, we have a zero-tolerance approach to bribery and corruption, so offering or accepting a bribe in any form, directly or indirectly, is strictly prohibited. Whoever we deal with, and wherever we may operate, we are committed to doing so lawfully, ethically and with integrity.



- 4.7 We are committed to complying with all applicable laws and regulations, including the Ten Principles of the UN Global Compact, especially Principle 10: businesses should work against corruption in all its forms, including extortion and bribery. Local laws shall also apply depending on the jurisdictions in which we operate, including the Spanish Criminal Code, the US Foreign Corrupt Practices Act 1977 and the UK Bribery Act 2010.
- 4.8 At Job&talent, we shall not offer or give anything of value to any private person, governmental official, or charitable or political organisation for any unlawful, corrupt or improper purpose or for facilitating a routine government service or action. Likewise, we do not authorise or condone third parties, such as suppliers or channel partners, to do so on our behalf. We only enter business relationships with reputable third parties that share our ethical standards.
- 4.9 Remember that we shall not accept, offer, promise, pay, permit or authorise:
- (a) bribes, facilitation payments, kickbacks or illegal political contributions;
 - (b) money, goods, services, entertainment, employment, contracts or other things of value, in order to obtain or retain improper advantage; or
 - (c) any other unlawful or improper payments or benefits.
- 4.10 Employees should report to their immediate supervisor and the Chief People Officer, any other member of the People & Culture department, or the local Compliance team, if applicable, if they believe or suspect that a breach of these rules is occurring or has occurred at Job&talent. Additionally, they may use the established whistleblowing channel (see whistleblowing policy). All concerns about bribery or corruption will be treated confidentially. Appropriate disciplinary or legal action will be taken by Job&talent in case of non-compliance with these rules.

Gifts and entertainment

- 4.11 In the right circumstances, a modest gift may be a thoughtful way to say “thank you”. Showing appreciation for a client or third party strengthens our business relationships when done appropriately. Exchanging gifts, entertainment or hospitality to improperly influence business decisions erodes trust and leads to business outcomes that don’t put the Company, its products and services first.
- 4.12 Offer reasonable and customary gifts, entertainment or anything else of value only where there is a legitimate business purpose and where the gift does not create an appearance of impropriety .
- 4.13 Do not request, solicit personal gifts, favors, entertainment or services. Accepting or offering gifts of money or money equivalents (i.e., gift cards) are never allowed.
- 4.14 Only accept gifts that are valued at less than 200€, reasonable, customary and in good taste and that will not appear to inappropriately bias future decision-making.



Anti-money laundering

- 4.15 We conduct our businesses in compliance with the law. Therefore, we avoid during any kind of business with persons and/or entities whose aim or purpose may involve or be supportive of money laundering or terrorist financing.
- 4.16 Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and is not limited to cash transactions. Involvement in such activities undermines our integrity, damages our reputation and can expose Job&talent and individuals to severe sanctions.
- 4.17 Job&talent relies on you to:
- (a) Report any suspicious financial transactions and activities to Finance & Legal and, if required, also report to appropriate government agencies. Bear in mind that Job&talent is committed to collaborate with the relevant Authorities,
 - (b) Never make payments to third parties or bank accounts unrelated to a transaction or that are not specified in the corresponding contract, taking special care not to accept contractual provisions where the third-party unilaterally specifies the payment destination,
 - (c) Never do business with customers, suppliers or partners involved in commercial activities using funds from illegitimate sources of where you may suspect this is the case,
 - (d) Implement adequate controls of anti-money laundering in the markets in which we operate,
 - (e) Comply with all applicable anti-money laundering.

Anti- Tax evasion

- 4.18 We conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to the facilitation of tax evasion in any jurisdiction in which we, or any of our suppliers or customers act. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implementing and enforcing effective systems to counter tax evasion facilitation.
- 4.19 We take our legal responsibilities very seriously. We will uphold all laws relevant to countering tax evasion in all the jurisdictions in which we operate.

Slavery, human trafficking and child labour

- 4.20 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems



and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

- 4.21 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under all applicable regulations in all jurisdictions in which we work. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

You can find the full policy [Child Labour Remediation Policy](#) and [Forced Labour & Ethical Policy](#).

Environmental behavior

- 4.22 We are committed to promoting sustainable development and work practices. To that end, we comply with the environmental laws and regulations in the countries where we do business. In addition, we expect our suppliers and business partners around the world to share in our commitment to the protection of the environment.
- 4.23 We are committed to ensuring compliance with relevant United Nations Global Compact principles, including that we shall:
- (a) support a precautionary approach to environmental challenges (Principle 7);
 - (b) undertake initiatives to promote greater environmental responsibility (Principle 8); and
 - (c) encourage the development and diffusion of environmentally friendly technologies (Principle 9).

Hiring limitation

- 4.24 To uphold the principles of fairness, transparency, and meritocracy, the organization strictly prohibits the hiring of any family members of employees holding positions at Level 10 or above. Under no circumstances shall Level 10 employee's family members be eligible for employment within the organization.
- 4.25 This aims to prevent nepotism and ensure that all employees are hired based on their qualifications, skills, and suitability for the role. By adhering to this policy, the organization demonstrates its commitment to leading by example and fostering an inclusive and unbiased work environment.

5. COMPANY ASSETS AND INFORMATION TECHNOLOGY AND SECURITY

Intellectual Property and Confidential information

- 5.1 We vigorously protect our intellectual property and confidential information, and follow our internal policies on the proper use, safekeeping, marking and handling of such property and information. We respect the intellectual property and confidential information of others and expect the same from others in return.



- 5.2 We comply strictly with all intellectual property licences, obligations and term requirements. Confidential information needs to be appropriately labelled and classified, and access should be limited to only those who have a specific need to know. Remember that an outside party must sign a proper non-disclosure agreement before disclosure of any confidential information.
- 5.3 We rely on you to never disclose or misappropriate confidential or sensitive information belonging to the Company or any third parties without the required written prior authorization.

Data Protection

- 5.4 We acknowledge the importance of personal data protection and believe that the principles behind data protection strengthen individual rights.
- 5.5 We collect, use, store, handle, transfer and disclose personal data in accordance with applicable laws and verify our suppliers and business partners to do the same.
- 5.6 We are committed to guaranteeing the protection of privacy and the appropriate use of personal data, whether belonging to our employees or other stakeholders, and we abide by all applicable laws in the countries where we operate.
- 5.7 We do not allow the disclosure or misappropriation of confidential information or sensitive information belonging either to the company or any employees, worker, third parties suppliers, or/and customer in any public channel (including, among others, internal channels such as slack group) and by any other means without the required prior written authorisation.

Social media and external communication

- 5.8 We communicate in a respectful, honest, transparent, and professional manner. All employees are expected to use social media, and all other external communication channels responsibly, and to ensure that all confidential information is protected. Please do not share information about the business strategy, financial performance, or partnerships of the company unless greenlighted by the Brand & Communications department. If you make an error in communicating information externally, be sure to correct it promptly and indicate transparently that an error has been made.
- 5.9 All external communications on behalf of the company (including speaking with journalists, giving media statements, speaking at conferences) must be made by specifically designated and authorised persons and must follow the guidelines determined by the Brand & Communications department. You can contact the department via comms.team@jobandtalent.com.

6. COMMUNITY INVOLVEMENT AND SOCIAL RESPONSIBILITY

Human Rights

- 6.1 We shall comply with all internationally recognised human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles



concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work from time to time in force.

6.2 We shall comply with the United Nations International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. In particular, we acknowledge the fundamental principles relating to freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation as a means to ensure decent working conditions.

6.3 We are committed to ensuring compliance with relevant United Nations Global Compact principles, including that we shall:

- (a) support and respect the protection of internationally proclaimed human rights (Principle 1);
- (b) make sure that we are not complicit in human rights abuses (Principle 2).
- (c) uphold the freedom of association and the effective recognition of the right to collective bargaining (Principle 3)
- (d) seek to eliminate of all forms of forced and compulsory labour and child labour (Principles 4 and 5); and
- (e) eliminate discrimination in respect of employment and occupation (Principle 6).

6.4 We shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force in any part of its supply chain. This includes, but is not limited to, not supporting or engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour and prison labour.

7. YOUR RESPONSIBILITIES

7.1 You must ensure that you read, understand and comply with this Code.

7.2 You must also:

- Notify your manager or the CPO and/or the People & Culture local team as well as the local compliance team, if any, as soon as possible if you believe or suspect that a breach of this Code has occurred, or may occur in the future. You can also use the whistleblower channel that the company has in place (more details in the Whistleblowing Policy).
- Understand and comply with specific laws and regulations that apply to your specific role.
- Complete any mandatory associated training that is offered to you.



8. CONSEQUENCES OF FAILURE TO COMPLY

8.1 Disciplinary action, up to and including termination and/or legal proceedings, may result from any failure to comply with:

- The Code.
- Applicable laws, rules or regulations.
- Any other Job&talent policy or the staff handbook.

Version control

Date of revision and publication	Name of person responsible for revisions
V1. March 2023	Aymara Santamaría



Annex I

Country	Policy's name / link	Responsible
Colombia	Business Practice; Conflicts of interest; Bribery and Corruption; Anti-money laundering; Anti-tax evasion: <i>Política Integral</i>	Carlos Paz
Colombia	Drugs and Alcohol: <i>Política de Prevención De Adicciones Con Y Sin Sustancias El Foco Soy Yo Y Yo Soy Job&talent</i>	Carlos Paz
Colombia	Human Rights Policy	Carlos Paz
Portugal	Anti-Corruption	Elsa Furtado and Isa Canhoto
Portugal	Data Protection	Elsa Furtado and Isa Canhoto
Portugal	Drugs and Alcohol	Elsa Furtado and Isa Canhoto
Sweden	https://sites.google.com/Job&talent.com/se/Job&talentintra/hem	Camilla Ceder
UK	Anti-bribery Policy	Agostina Bianco
UK	Anti-facilitation of Tax Evasion Policy	Agostina Bianco
UK	Employee Handbook (Alcohol and Substance Abuse, Data Protection)	Agostina Bianco



Annex II - Form of Acknowledgment of Receipt of Code of Conduct and Ethics

I have received and read the Company's Code of Conduct and Ethics. I understand the standards and policies contained in the Company Code of Conduct and Ethics and understand that there may be additional policies or laws specific to my job and/or the location of my posting.

I declare I (check the correct answer):

- Have no conflict of interests to declare
 - Have the following conflict of interests to declare: _____
-

I further agree to follow the values of the Company in all that I do and comply with the Company Code of Conduct and Ethics.

If I have questions concerning the meaning or application of the Company Code of Conduct and Ethics, any Company policies, or the legal and regulatory requirements applicable to my job, I know I can consult my manager, the People & Culture Department or the Legal Department, knowing that my questions or reports to these sources will be maintained in confidence.

Employee Name:

Date:

Signature:

