



**job&talent**

# **Our Code of Conduct**

Approved by the Board of Directors of Job and Talent Holding Limited on 27 April 2026

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## A message from our CEOs

At Job&Talent, we share a common approach: we want everyone to give their best and to achieve this we want them to feel secure, included and proud to be part of this team.

This Code of Conduct brings this way of working to life. It establishes how we should act and behave with each of the people we interact with on a daily basis. Being honest, transparent and ethical is everyone's responsibility and forms the basis of a company that can be trusted.



For us, acting ethically goes far beyond complying with the law: it is part of who we are. In every relationship, whether with colleagues, employees, customers or investors, we strive for impartiality, fairness, justice and integrity.

Our reputation as a company and as a trusted partner depends on each and every one of us. With this Code, we want to reinforce something fundamental: we are a team that acts with integrity, where ethical behaviour is non-negotiable.

We invite you to read this document carefully and apply it in your daily work. Use it as a guide to make fair and honest decisions and to comply with the rules that govern how we work.

If you have any questions about its content, please do not hesitate to speak to your manager or contact the People & Culture team, your local Compliance team, the Global Compliance Officer or the HQ Compliance team.

**Juan Urdiales and Felipe Navío**

Co-CEOs of Job&Talent



# 1. Our Core Operating Principles

This Code clearly explains Job&Talent's values and how they help us build our company and make the best decisions every day. It sets out the principles that guide our decisions, processes, behaviours and relationships with colleagues, clients, users, suppliers and society at large.

The Code is founded on our core operating principles:

- **Hands-on:** we are proactive and show initiative. We seek to understand all aspects of our job and have maximum impact in what we do. We go above and beyond to understand how we fit into the bigger picture.
- **Bootstrapping:** we accomplish more with less. We stay humble, carefully evaluating our resources to ensure our initiatives can be sustained. We are frugal and resourceful entrepreneurs, always pushing our limits to achieve our goals in an efficient manner.
- **High Standards:** we are continuously raising the bar. We drive ourselves and our colleagues to deliver high-quality products, services and processes. We constantly seek opportunities to improve, and we celebrate our successes.
- **Analytical:** we harness the power of insightful data. We optimise our business decisions with data analyses, while never losing sight of the broader perspective, individual experiences and invaluable personal insights.
- **Extreme ownership:** we take responsibility for everything we are involved in. We strive to succeed, but see failure as an opportunity to learn about ourselves and our work. We can always do better. We are dedicated, brave and take full ownership.
- **Communication:** we all have a voice to be heard, and we use it in a constructive way. We are honest and sincere. We exchange feedback, always. We listen and adapt. We treat all stakeholders with dignity and respect.
- **Innovation:** we challenge the status quo, explore new technologies and ways of working. We are never afraid to propose and defend new ideas. We are open-minded and fearlessly embrace change.



# 2. Our Responsibilities



This Code sets out the principles and commitments that govern our conduct and must guide all our professional actions on a daily basis. We expect everyone who is part of the Company, as well as those who work with it, to know and comply with them.

Any breach may result in disciplinary or contractual measures, in accordance with internal regulations and applicable legislation.

### Who this applies to

This Code applies to everyone who works at Job&Talent ("the Company" or "the Group"), in any of its companies, without exception. This includes employees at all levels, managers, directors and officers.

When we refer to "any of its companies", we mean any entity controlled by Job and Talent Holding Limited, including its parent companies, subsidiaries, associates, affiliates or joint ventures.

This Code also extends to agency workers, seconded workers, volunteers, students on placements and self-employed workers, whether they have permanent or temporary contracts, and regardless of the country in which they are located.

The Company reserves the right to update or modify this Code at any time.

### Scope and primacy

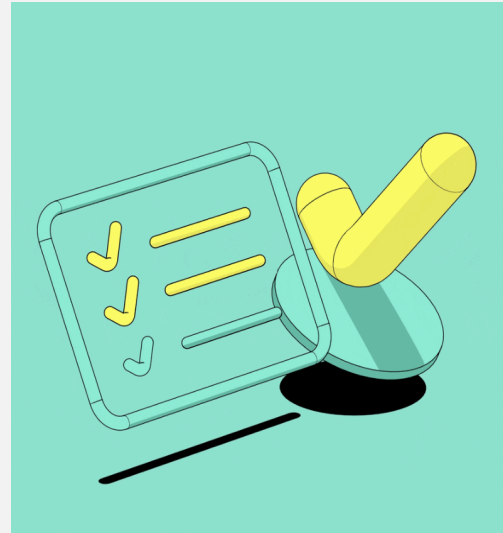
We operate in many countries and we are aware that local customs and laws may differ. For this reason, in some cases there may be additional, more specific guidelines. However, our Code of Conduct is our primary reference and guide for action at Job&Talent.

This Code is our framework for conduct. All codes, policies and rules or local guidelines must adapt to and always operate within what is established here. In case of any doubt in interpretation between this Code and any other document related to ethics and conduct, this Code shall always prevail. Under no circumstances will practices or customs that contradict this Code be permitted.



## Your responsibilities

- Read, understand and comply with this Code
- Comply with the laws applicable to your role
- Complete all mandatory training
- If you believe or suspect that a breach has occurred, is occurring or might occur, report it to your direct manager or director, the People & Culture team, the Global Compliance Officer or the HQ Compliance team



## We are listening. Your voice matters

Open communication is key to our culture of integrity. Sharing your feedback, questions or concerns enables us to protect Job&Talent and strengthen trust within the team.

If you have any questions about the interpretation or application of this Code, or if you know of, suspect or detect possible misconduct or an improper situation, you must report it through any of the following channels:

- To your direct manager or director
- To the People & Culture team
- To your local Compliance team
- To the Global Compliance Officer ([leonor.diaz@jobandtalent.com](mailto:leonor.diaz@jobandtalent.com)) or the HQ Compliance team ([hq.compliance@jobandtalent.com](mailto:hq.compliance@jobandtalent.com))
- Through the [whistleblower channel](#) (further details in our [Global Whistleblowing Policy](#))

All reports will be treated with the utmost confidentiality.

The Company guarantees no retaliation against anyone who makes a report in good faith, even in cases where the reported facts are not confirmed.



**I'm unsure whether what I experienced is improper under our Code of Conduct - what should I do?**



**Report it confidentially or anonymously via the whistleblower channel**

**You will not face retaliation for raising a concern in good faith**

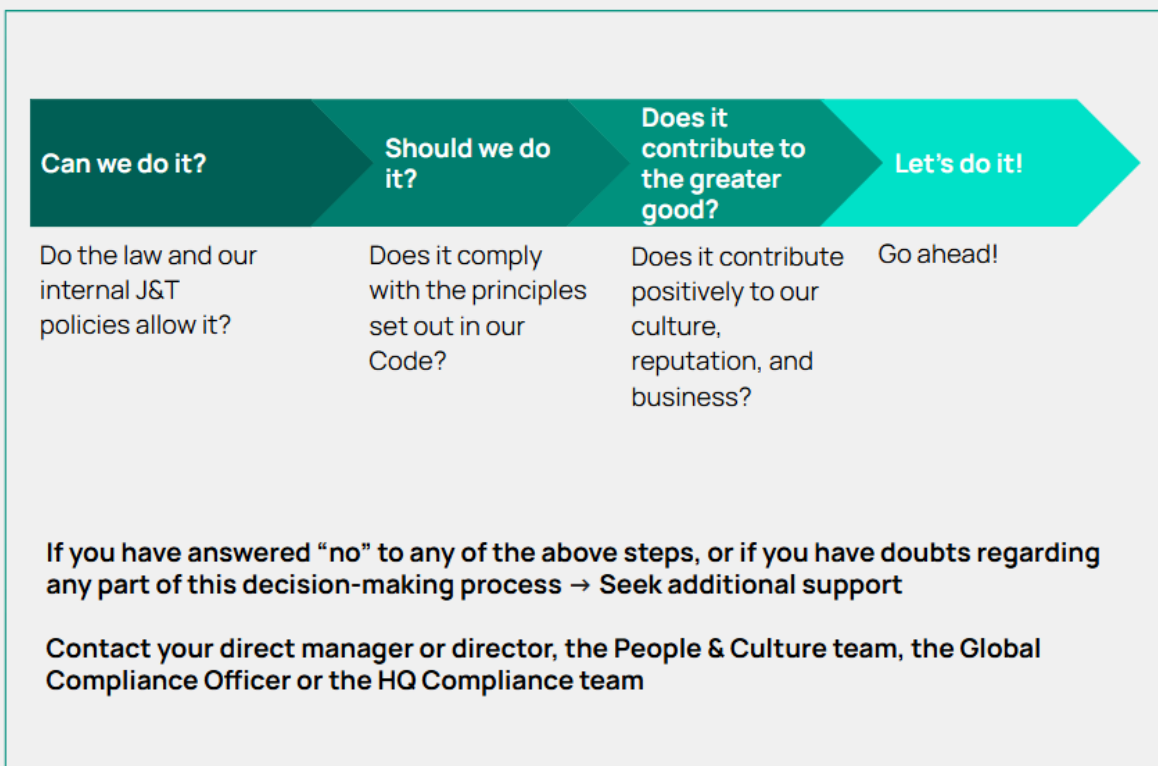
**[Access the whistleblower channel here](#)**



## How do we make the right decisions?

We operate in a fast-paced and changing environment, where we are used to acting quickly and efficiently. However, there will be times when we face situations that require us to pause and reflect in order to determine the most appropriate course of action. When this happens, how should we proceed?

In most cases, it is best to discuss the situation first with your direct manager. Together, you can use this decision-making model to resolve any doubts or questions that may arise in such scenarios.



## What happens if I don't comply?

Breach of this Code, any other Company policy or applicable laws may result in disciplinary action, including termination of contract and potential legal proceedings.



### **3. Doing Right by Our Team**



## Diversity and inclusion

At Job&Talent we promote diversity and inclusion. We are convinced that having diverse teams makes us more creative, innovative and competitive. We select people solely on the basis of their talent, qualifications, skills and experience. We maintain a zero-tolerance policy towards any form of discrimination, including any discrimination based on sex, gender identity or expression, sexual orientation, race, ethnicity, religion, age, nationality, marital status or disability.

We are committed to ensuring that all people are treated with respect, dignity and fairness, regardless of their role or position. We recognise that our teams are made up of people with different sensitivities and needs, and we foster empathy and open and respectful communication as the foundation of our working relationships.

For further information, please refer to our diversity, equity and inclusion policy. We also encourage you to contact your local team to find out about other local policies that may apply to you.

## Respectful workplace

We have a zero-tolerance policy towards any form of violence, harassment or abuse, whether physical, sexual, psychological or verbal. Each of us plays a fundamental role in creating an inclusive working culture where everyone is treated with respect and dignity. We do not tolerate abuse, intimidation, threats, bullying or sexual harassment, or any behaviour that may undermine anyone's dignity.

If you become aware of any situation involving harassment, discrimination or violence, report it immediately to your direct manager or director, the People & Culture team or the HQ Compliance team. We all have a responsibility to protect our working environment.

Contact your local team to find out about additional local policies that may apply to you.

## Health, safety and security

At Job&Talent we are committed to creating and maintaining safe and healthy workplaces that promote everyone's wellbeing. We have safety standards in place that meet all legal requirements in the countries where we operate, and we expect everyone to follow them.



You must understand your health and safety responsibilities, follow the measures in place to protect yourself and others, and use machinery, tools and protective equipment correctly.

Everyone must uphold the same high health and safety standards that the Company follows. You have the right to feel safe in the tasks assigned to you, especially if they involve any risk.

Maintaining a safe, professional and healthy workplace is everyone's responsibility at Job&Talent. The consumption of illegal drugs or other controlled substances during working hours is not permitted.

We all have a responsibility to act with care towards ourselves and those around us.

If you witness or are involved in an accident, or identify unsafe working conditions, report it immediately to your direct manager or director, the People & Culture team or the HQ Compliance team. You have the right to report any situation confidentially without fear of retaliation.

### Right to disconnect

Your wellbeing is important to us. We are committed to creating a working environment that is compatible with personal development and strikes the right work-life balance. We respect your right to disconnect. Except in exceptional or urgent situations, we do not expect you to respond to work emails, messages or calls outside your working hours.

For further information, please refer to the global right to disconnect policy.



## **4. Doing Right by Our Clients**



## Conflicts of interest

At Job&Talent we always act in the best interests of the Company, making decisions independently of personal interests.

A conflict of interest arises when a personal interest interferes with your work, or could reasonably be perceived to do so. Common examples include:

- Second jobs or external professional activities
- Financial investments
- Gifts or benefits
- Personal relationships
- Board positions
- Business opportunities

If you have a personal or professional interest that could reasonably be perceived as a conflict, disclose it as soon as possible to your manager, the Global Compliance Officer or the HQ Compliance team. Early and good faith disclosure allows us to manage the situation appropriately and will not result in negative consequences.

You must disclose if:

- You hold positions on boards or governing bodies of other entities
- You have significant shareholdings in competitors, customers or suppliers
- You are a director, C-level or board member of Job&Talent and have any potential conflict of interest

Transparency allows us to manage these situations properly. Avoid external commitments or activities that interfere with your responsibilities or damage Job&Talent's reputation.

Failure to disclose or deliberate concealment of a conflict of interest may result in disciplinary action.



## Bribery and corruption

Bribery and corruption involve giving or offering money, goods or other rewards to obtain an unfair or improper advantage.

At Job&Talent we have zero tolerance: offering or accepting bribes, directly or indirectly, is prohibited. We are committed to acting with integrity everywhere we operate.

We do not offer or give anything of value to individuals, officials, political or not-for-profit organisations for unlawful, corrupt or improper purposes. This includes facilitation payments. We do not allow third parties to do so on our behalf, and we work only with partners who share our ethical standards.

You must not accept, offer, promise, pay, permit or authorise:

- Bribes, facilitation payments, kickbacks or illegal political contributions
- Money, goods, services, entertainment, jobs, contracts or other items of value to obtain or retain an improper advantage
- Any other unlawful or improper payment or benefit

If you suspect a breach, report it to your direct manager or director, People & Culture or the HQ Compliance team, or use the whistleblower channel. All reports are treated in strict confidence without retaliation.

## Gifts and entertainment

A modest gift can show appreciation and strengthen business relationships when given appropriately. However, using gifts, entertainment or hospitality to improperly influence business decisions undermines trust and harms the Company.

Only offer or accept gifts, entertainment or other benefits when there is a legitimate business purpose and no appearance of improper conduct.

Key rules:

- Do not ask for personal gifts, favours, entertainment or services
- Cash gifts or cash equivalents (such as gift cards) are prohibited



- Only accept gifts worth less than €200 that are reasonable, customary, in good taste and do not appear to influence future decisions

## Anti-money laundering

At Job&Talent we do not tolerate doing business with anyone involved, directly or indirectly, in money laundering or terrorist financing, and we strictly comply with all applicable laws.

Money laundering is the process of making illegally obtained funds appear legitimate. It can seriously damage the Company's reputation and result in severe penalties for both Job&Talent and individuals involved.

If you detect suspicious activities or transactions, report them immediately to your direct manager or director, or to the HQ Compliance team.

Warning signs include:

- Payments to third parties or accounts with no clear and justified connection to the transaction
- Payments not provided for in the contract or that deviate from agreed terms, including unjustified changes to the amount, recipient or timing
- Clients, suppliers or partners who use, or are reasonably suspected of using, funds from illegal sources

Do not do business or continue commercial relationships with suspicious entities or where warning signs remain unexplained. Implement and follow the internal controls and due diligence measures applicable in each market where we operate.

## Preventing tax evasion

We act with complete integrity and transparency in meeting our tax obligations. We have zero tolerance for any form of tax evasion, whether direct or indirect, and for its facilitation by the organisation, its employees, suppliers, partners or clients.

We are committed to strict compliance with tax legislation in all jurisdictions where we operate and to conducting our activities honestly, ethically and responsibly.

We implement and enforce effective controls and systems to prevent, detect and combat any practice that could facilitate tax evasion, always acting professionally,



fairly and with integrity in all our business relationships, regardless of the country or market in which we operate.

### Modern slavery, human trafficking and child labour

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced or compulsory labour, human trafficking and child labour. All involve one person depriving another of their liberty to exploit them for personal or commercial gain.

We have zero tolerance and apply controls to prevent it in our business and supply chain.

We demand maximum transparency and require contractors, suppliers and partners to meet equivalent standards, including specific prohibitions on forced labour, trafficking and slavery (adults and minors). We require our suppliers to extend these same standards to their own supply chains.

For further information, please refer to our child labour remediation policy and forced labour & ethical policy.

### Human rights

At Job&Talent we are committed to respecting internationally recognised human rights and complying with the principles and fundamental rights set out in the International Bill of Human Rights and the International Labour Organisation Declaration.

We align our actions with the principles of the United Nations Global Compact, particularly regarding respect for human rights, freedom of association and the right to collective bargaining, elimination of forced or compulsory labour, eradication of child labour and elimination of all forms of discrimination.

Job&Talent recognises that its business operations and supply chain may have a potential or actual impact on the human rights of external stakeholders, including local communities, suppliers and temporary workers. We are committed to identifying, preventing, mitigating and, where appropriate, remedying such adverse impacts.

We strictly comply with all applicable laws, statutes, regulations and codes on preventing and combating modern slavery and human trafficking in any jurisdiction and throughout our supply chain. We do not support, participate in, or tolerate any form of forced or compulsory labour, child labour, or modern slavery, and we will never directly or indirectly require such practices.



## Sustainability and environmental responsibility

We promote responsible development and sustainable labour practices, integrating respect for the environment into our decisions and daily activities.

We comply with applicable environmental legislation in the countries where we operate and require the same commitment from our suppliers, contractors and business partners. We promote responsible resource management, prevention of negative environmental impacts and continuous improvement of our environmental performance.

We are committed to respecting and promoting the principles of the United Nations Global Compact.



## **5. Doing Right by Job&Talent**



## Restrictions on hiring (nepotism)

At Job&Talent we promote a working environment based on fairness, transparency and meritocracy. To ensure that all hiring decisions are based exclusively on professional criteria, as a general rule we avoid hiring relatives of employees in positions at level 10 or above. Any exception to this principle requires a transparent selection process that includes consideration of other qualified candidates, justification of the candidate's suitability based on objective criteria and prior notification to the HQ Compliance team, ensuring transparency and managing any potential conflict of interest.

This measure aims to prevent nepotism, avoid conflicts of interest and ensure that all candidates are assessed on equal terms based solely on their experience, skills and suitability for the role.

This commitment reinforces an inclusive, impartial working environment aligned with our ethical values.

## Trade and economic sanctions

We strictly comply with all applicable trade and economic sanctions in the jurisdictions where we operate, including those set by the United Nations, the European Union, the United Kingdom and other relevant countries.

We do not participate, directly or indirectly, in operations, transactions or activities involving:

- Embargoed or sanctioned countries or territories
- Persons or entities on official sanctions lists
- Entities that are controlled, directly or indirectly, 50% or more by sanctioned persons or entities

Breach of these sanctions can have serious legal and reputational consequences for both Job&Talent and the individuals involved. All employees must exercise due diligence and remain alert to possible sanctions-related exposures. Any operation or business relationship that may involve sanctioned countries, territories, persons or entities must be reported in advance to the HQ Legal team and/or the HQ Compliance team for appropriate assessment and management.



## Financial integrity and accurate records

We act with responsibility and transparency in managing financial information. We maintain appropriate internal controls to ensure our financial records are accurate, complete and reliable, and to prevent any form of fraud, manipulation or misuse of information.

Everyone involved in managing, preparing or reviewing financial information must ensure that data accurately reflects the reality of operations and complies with applicable regulations. Any irregularity, significant error or suspicion of improper conduct must be reported immediately through the established channels.

Job&Talent has specific internal control and internal audit functions that regularly monitor the integrity of financial processes and report to the relevant governing bodies, such as the Audit Committee.

## Fair competition and antitrust laws

We are committed to free, fair and open competition. We comply with competition and antitrust laws in all jurisdictions where we operate and reject any practice that could distort the functioning of markets.

The following conduct is strictly prohibited:

- Sharing confidential or sensitive information with competitors
- Obtaining or improperly using non-public information
- Participating in practices that limit or restrict competition

If you suspect anticompetitive behaviour, report it immediately to your direct manager or director or the HQ Compliance team for appropriate analysis and management.



## **6. Protecting Our Information and Resources**

## Intellectual property

We protect Job&Talent's intellectual property and confidential information and respect that of third parties, strictly complying with all licences, obligations and deadlines, and applying our internal policies on proper use, custody, marking and handling of intellectual property and information.

Confidential information must be classified and access limited to those with a need to know. Do not disclose or misuse confidential or sensitive information belonging to the Company or third parties without prior written authorisation.

Before disclosing confidential information to external parties, an appropriate confidentiality agreement must be signed.

## Data protection

We recognise the importance of personal data belonging to any stakeholder and process it in accordance with applicable laws in each jurisdiction, requiring the same from suppliers and partners, and guaranteeing privacy and proper use.

We do not permit disclosure or diversion of confidential or sensitive information (including that of the Company itself, employees, workers, suppliers or clients) through public channels, internal channels or any other means without prior written authorisation.

## Social media and external communications

We communicate respectfully, honestly, transparently and professionally. We expect all employees to use social media and other external communication channels responsibly and in a way that ensures adequate protection of all confidential information.

Unless approved by the Brand & Communications team, do not share information about strategy, financial performance or partnerships. If you make a mistake, correct it and report it with complete transparency.

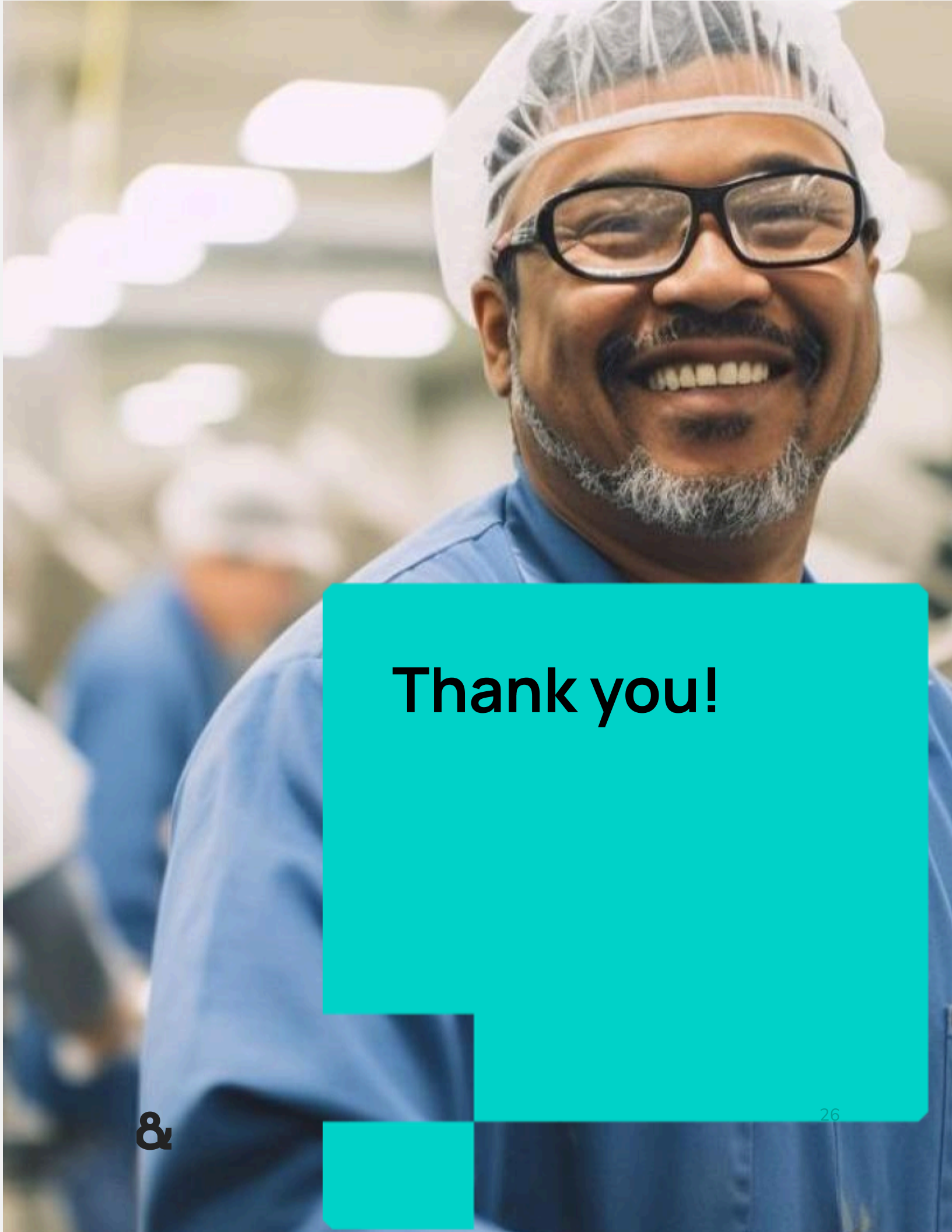
All external communications made on behalf of Job&Talent (including conversations with journalists, media statements or participation in conferences) may only be made by authorised persons and following guidelines from the Brand & Communications team ([comms.team@jobandtalent.com](mailto:comms.team@jobandtalent.com)).



## Version control

<b>Name</b>	<b>Role</b>	<b>Type of Approval / Review</b>	<b>Date</b>	<b>Version</b>
Aymara Santamaría	VP of Legal Operations	Creation	April 2023	V1
Aymara Santamaría	VP of Legal Operations	Revision	February 2024	V2
Aymara Santamaría	VP of Legal Operations	Revision	December 2024	V3
Leonor Díaz	Senior Legal Director and Global Compliance Officer	Revision	February 2026	V4
Jim Grube	Audit Committee Chair and Interim Board Chair	Approval	February 2026	V4





**Thank you!**