



twoday

Business code of conduct

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Message from the CEO

Dear colleagues,

In recent years, there has been a significant shift in the business climate away from a focus only on profit to a broader responsibility towards society and the environment. This change reflects a growing recognition that companies need to consider their impact beyond financial gains. Corporate social responsibility (CSR) has become integral, encompassing sustainable practices and community engagement, and success is now measured not only by financial performance, but also on a positive societal and environmental impact.

Central to our success at twoday is our commitment to operating with the highest ethical standards. We prioritize the well-being of our team members and foster a culture of openness and feedback, aiming to continually improve as an employer of choice within Data and technology. This dedication has led to market-leading engagement among our employees, with an eNPS exceeding 58.

Our core values—Heart, Drive, and Adaptability—serve as the foundation for our internal and external relationships. These values not only guide how we behave but also shape how we are perceived by our clients, partners, and society at large.

The twoday Code of Conduct is a dynamic document designed to ensure that ethical behaviour is embedded in our attitudes and actions. It serves as a roadmap for translating our core values into tangible business practices and governs how we interact with our customers, partners, communities, and each other.

This code applies to all employees and extends to third parties representing twoday in any capacity. We set the bar high, aligning our conduct with the best practices outlined by organizations like the United Nations.

As we embark on this journey together, I extend my gratitude to each of you for your commitment to upholding our values and supporting the twoday Code of Conduct. Together, we will continue to evolve, ensuring that ethical behaviour remains a cornerstone of our culture and business practices.

Thank you for your dedication and support.

Best regards

Christian Pedersen
CEO of twoday



Code of conduct

At twoday, we are committed to maintaining highest ethical and professional standards in our business practices. This Code of Conduct provides guidelines for the ethical and professional behaviour expected of employees, contractors, and business 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 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](#).

Our expectations to suppliers and business partners

We prioritise ethical integrity and compliance in all our business dealings, including our relationships with suppliers and business partners. It's essential that these entities share our commitment to high ethical and legal standards. Before forming any new partnerships, we rigorously assess their alignment with our principles through our vendor assessment process. This ensures our partnerships are built on a foundation of mutual respect for ethical conduct and legal compliance, reflecting our broader commitment to responsible business practices. Please read our [Supplier code of conduct](#) for more information.

Comply with applicable laws and regulations

Compliance with legal requirements is fundamental at twoday. While we meet minimum legal standards, we uphold our own higher standards. Each of us must adhere to the legislation in our respective countries of operation, recognizing that legal requirements may vary across borders.

While it's not expected for everyone to be versed in all legal nuances, it's crucial to maintain awareness of relevant laws to identify and address any illegal behaviour within twoday. When uncertain about legal obligations, consult with legal counsel before making decisions.

Highlighted below are key legal requirements applicable to all twoday entities and employees. It's important to note that this list is not exhaustive, and additional laws may apply.



Anti-corruption

You as a twoday employee shall always act in a fair and transparent way when acting 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 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.

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

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

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

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 the highest ethical and professional standards



Conflicts of interest

Situations where personal relationships or financial interests intersect with job duties and loyalty to twoday may arise, posing conflicts of interest. All employees must refrain from actions that create or appear to create conflicts between personal and twoday's interests.

Expected behaviour includes:

- Refraining from holding interests in businesses outside twoday that compete with or serve twoday's entities, which could compromise objectivity in fulfilling job responsibilities.
- Avoiding conducting business on behalf of twoday with close personal connections, such as friends or family members.

Remember, it's your duty to prioritize twoday's best interests and steer clear of conflicts. If you become aware of a potential conflict, it's imperative to report it. When uncertain, seek guidance from your supervisor.



Gifts from business partners

At twoday, we have a stringent policy on gifts and hospitality to uphold our integrity and independence in business decisions. We do not offer or accept gifts or benefits that could influence our objectivity. Gifts and hospitality are only permissible if minimal in value, appropriate to the context, and consistent with standard business practices. It's each individual's responsibility to adhere to these guidelines, and twoday does not make charitable donations on behalf of our customers.

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 financial performance — 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.
- Our commitment extends beyond financial performance to minimizing our environmental footprint. When traveling on behalf of twoday, use common sense and follow the travel policies provided by Group. When booking hotels and buying meals, find affordable options. Prioritize the use of public transport whenever feasible. Additionally, consider utilizing technologies like video conferencing for meetings whenever appropriate, reducing the need for unnecessary travel and its associated environmental impact.

Securing intellectual assets and embracing ethical innovation

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.



Responsible AI

In our use of Artificial Intelligence (AI), we prioritize ethical practices and compliance. We ensure the use of AI technologies respects privacy, confidentiality and intellectual property rights, aligning with the principles of responsible AI. Prior to employing AI tools, we verify their compliance with GDPR and relevant regulations, particularly when handling personal data. We are dedicated to obtaining all necessary consents, performing detailed impact assessments, and promoting transparency and fairness in AI implementations. Our goal is to harness AI in ways that are beneficial and inclusive, free from bias, and supportive of diversity.



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 companies adhere to twoday's Data Protection Program and have implemented appropriate organisational and technical measures to ensure a high level of data security. As an integral part of this effort, all twoday employees undergo mandatory awareness training.

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' 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.



Promoting diversity and inclusion

At twoday, we value diversity as a cornerstone of our success. We recognize the importance of fostering an inclusive environment where all employees, regardless of gender, sexual orientation, race, attire, religion, or other characteristics, feel respected and valued.

We believe that attracting and retaining a diverse range of talents with varied backgrounds, experiences, and skills is essential for our growth and development. Embracing diversity not only enriches our workplace culture but also enhances our ability to innovate and adapt in a rapidly changing world.

Furthermore, we are committed to providing a supportive working environment that enables each employee to perform at their best. We believe that by championing diversity and inclusion, we can create a more dynamic and vibrant workplace where everyone can thrive.



Employee Engagement Survey (EES)

Employee engagement is important at twoday and we regularly assess it 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. If you experience or witness any installations, policies, faults, or defects that pose a risk to security, life or health, please inform the safety representative or leader immediately.



Drugs and alcohol

twoday employees' health and safety are our primary concern. We aim to ensure a secure working environment for our employees. Drug use is forbidden, and alcohol consumption during working hours are not acceptable.

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, we kindly request that you portray a positive image of our company and prioritize its best interests. While we always welcome feedback and encourage individual opinions, we prefer that any concerns about the company is addressed directly with your leader or another member of the twoday team rather than being shared negatively on social media.

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 feasible 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 at twoday

Our commitment to reducing our environmental impact is embedded in every aspect of our operation, guided by our three main pillars: A Better Tomorrow, People First, and Enabling Customer Sustainability.

Here's how you as an employee can contribute:

A better tomorrow:

- Carbon neutral: Your efforts to adopt green practices and support the use of renewable energy are key to our mission to become carbon neutral by 2030.
- Reducing e-waste: Your contribution is crucial when you use twoday's resources wisely, support updating and fixing our equipment instead of just replacing it. We as an employer have partners who helps us reuse, repair or recycle our e-waste, please contact your local support for more information.

People First:

- Building an Inclusive Culture: Your efforts to create a workplace where diversity is not just accepted but celebrated are crucial for our collective success and innovation.
- Supporting each other's growth and well-being: Taking part in activities that boost our mental, physical, and emotional health, and getting involved in groups focused on diversity and inclusion, makes us all stronger together.

Enable Customer Sustainability

- Developing sustainable digital solutions: Focus on designing and developing software that helps organizations achieve their sustainability goals. Your work in crafting innovative solutions, such as energy-efficient applications or platforms that monitor and reduce carbon emissions, directly supports our customers' environmental objectives.
- Enhancing sustainability competence: Actively participate in learning and development opportunities related to sustainability to embed these principles deeply into our product development. By gaining and sharing knowledge on sustainable practices, you ensure that sustainability becomes a priority in every project we undertake.

What more can you do?

- Limit nonessential business travel, preferring remote communication tools and sustainable transport options.
- Minimize waste and opt for sustainable commuting practices, emphasizing public transportation, biking, or walking.
- Make environmentally conscious decisions in procurement, web hosting, and other business-related activities.

Updates to the code

Our Code of Conduct is a living document and are reviewed and reapproved annually to ensure it remains effective and relevant amidst evolving legal requirements, regulatory frameworks, and industry best practices.

Revisions to the Code will be communicated through established channels, with a commitment to transparency and accountability. Team members are expected to regularly review the Code of Conduct and integrate any changes into their day-to-day operations.

Last reviewed and approved: **April 2024**

Please contact lasse.mench@twoday.com for any questions or concerns.

Version: **2.1**

We create a **better tomorrow** through technology

twoday