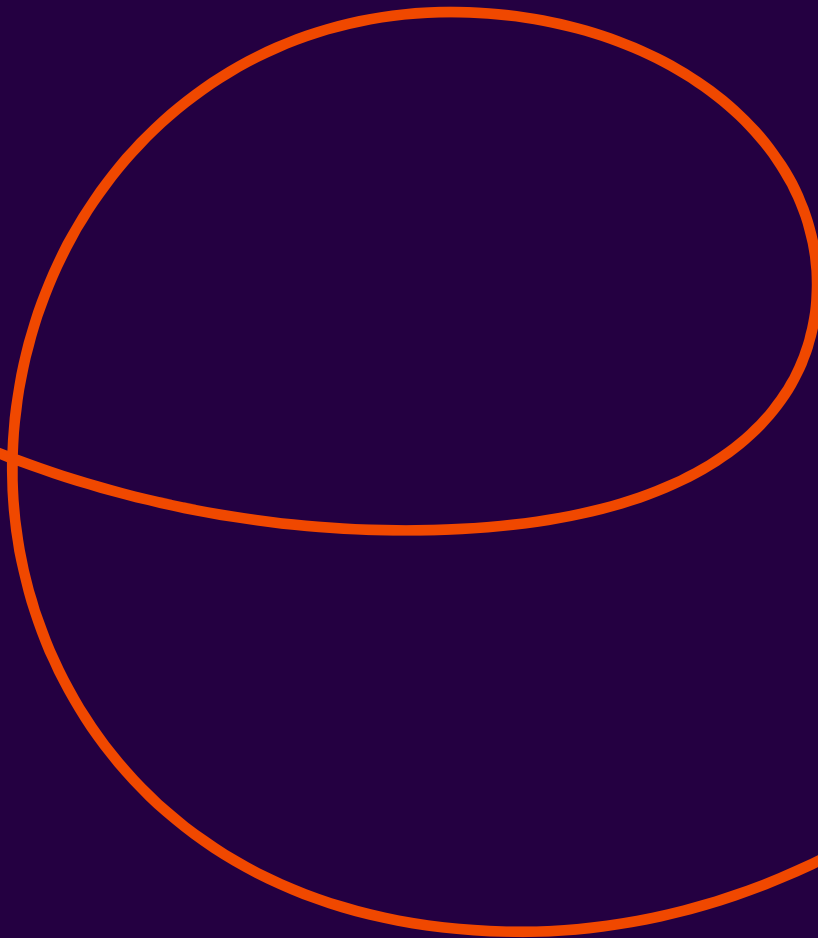




# Code of Conduct

Publicity

Public



## About our Code of Conduct

**As a data consultancy, we are in the business of trust. We enable our customers' data-driven business transformation and strive for a future we can all trust. Our success relies on the confidence our customers and stakeholders have in us, and every Epical employee has a critical role in building and maintaining that trust.**

Together with other Epical policies, this Code of Conduct (Code) forms the foundation for the way we work and it applies to everyone at Epical. It helps us to ensure that we conduct business in an ethical and responsible way in accordance with Epical's policies and virtues: curiosity, empathy, empowerment and accountability.

Read more about [Epical's virtues](#) on the intranet. Epical and all Epical employees are committed to ethical and responsible conduct in all of Epical's operations, and we expect the same commitment from our contractors and suppliers. We operate in full compliance with all applicable laws and regulations of each country in which Epical operates.

This document is based on recognized international standards, principles and best practices. It is not a substitute for, and should not be considered to override, applicable laws and regulations. Where local or applicable industry standards are higher than applicable legal requirements, we meet the higher standards. For some topics, more instructions are included in separate policy documents.

At Epical, we live by our virtues and our Code of Conduct. If you have any concerns or would like to report on a potential violation of the Code of Conduct, please find information below about our whistleblower channel. You can also contact your manager or send an email to [privacy@epicalgroup.com](mailto:privacy@epicalgroup.com). Your input is handled with total confidentiality.

### **We respect the rights of our employees**

Epical's most valuable assets are its people. A healthy and safe work environment is ensured for all employees in compliance with all applicable health and safety laws and regulations. Epical also complies with applicable employment legislation and collective bargaining agreements on e.g. working hours and respects employees' right to leisure time and work-life balance.

Epical complies with international human rights and labor rights standards and ensures equal opportunities for all employees (including potential recruits) based on competence, experience and performance, without regard to gender, ethnicity, religion, sexual orientation and/or other characteristics protected by applicable law.

All Epical employees are free from corporal punishment, physical, sexual, psychological or verbal harassment, bullying or abuse.

Epical does not use child or forced labor in any of its operations or activities.



## **We fight corruption and fraud**

We at Epical are against every kind of bribery, fraud and corruption committed to obtain or retain business or otherwise gain an undue advantage, pay or receive bribes, or provide or request anything of value. We comply with applicable anti-bribery and corruption laws and regulations in each country in which Epical operates.

Any event organized or participated in with a government official or other business partner should be reasonable, appropriate and have a legitimate business purpose. Customary gifts of limited nominal value may be given or accepted, if it is obvious that the receiver will not be influenced in their decision by accepting the gift.

More information about anti-corruption, as well on working with government entities and other related topics, is included in Epical's Anti-Corruption Policy.

## **We avoid conflicts of interest and encourage fair competition**

All Epical employees must avoid any situation in which a personal interest conflicts or appears to conflict with the interest of Epical.

Epical is committed to always competing fairly, and we do not enter into any agreements that hinder competition. Epical also complies with applicable trade regulations, including export controls, trade restrictions, trade embargoes, economic sanctions and boycotts.

Epical is driving sustainable growth by optimizing efficiency and value through responsible sourcing and seamless integration across the value chain, with a strong commitment to environmental, social, and governance (ESG) principles. Epical's contractors and suppliers are required to adhere to the principles described in this Code and described in detail in Epical's Supplier Code of Conduct.



## **We safeguard assets and information**

We always safeguard Epical's, our customers' and our business partners' assets, such as tangible assets, data or intellectual property rights. Such assets are only to be used for legitimate business purposes and protected from loss, damage, disclosure or unauthorized use.



Trust is the foundation of every successful business. At Epical, our purpose is to work towards a future we can all trust. We believe that responsible use of data is a powerful tool for creating positive change in the world, helping to solve some of our most pressing problems for our customers and the society around us. As part of this, we raise concerns early and are transparent, honest and open in all situations.

We are all an important part of Epical's brand, and communication is an important tool for managing our company internally and externally. We do not make public statements that harm Epical, our employees or our business partners. We all take responsibility of only communicating true and accurate information and not disclosing confidential or business-critical information. Employees who are contacted by outside sources or the media requesting information should refer to Epical Marketing & Communications.

Epical complies with the applicable laws and rules governing privacy and data protection. For more information, please refer to Epical's [Privacy Policy](#).

### **We preserve the environment**

Epical is committed to protecting the environment beyond our corporate boundaries. As we do not manufacture products, we concentrate our efforts on the services and activities that are within our sphere of influence, such as office-related services, corporate cars and business travel.

Epical has conducted a climate transition plan in accordance with the Paris Agreement on climate change. The most significant measures to reduce greenhouse gas emissions are related to exploring the possibility of using fossil-free energy sources in our offices and refining the data from previous calculation results.

For more information, please refer to Epical's Environmental Policy or our sustainability approach.

### **Measuring sustainability**

It's important to identify and consider environmental, social, and governmental (ESG) risks in business. Epical has conducted a double materiality analysis to identify the most significant ESG impacts. We aim to monitor and document risk management as part of sustainability reporting. Epical uses indicators for measuring sustainability targets in accordance with the CSRD requirements. We set concrete, measurable goals for achieving environmental and social responsibility and monitor their progress.

### **Whistleblowing**

At Epical, we are committed to our virtues and ethical and responsible conduct in all our operations. We value the safety and respect of everyone affected by our business.

Epical's whistleblowing channel can be used to inform about any violations of cases of misconduct, such as bribery or corruption, other illegal activities, acts or actions in violation of Epical's Code of Conduct. It is provided by an external partner and encrypted to ensure full anonymity.

Information about the whistleblowing channel is available on Epical's [website](#) as well as on the intranet [whistleblower page](#).