



Transparency Act Ework Group Norway

2023

About Ework Group

Ework Group AB (publ) provides total talent solutions with a focus on IT/OT, R&D, Engineering and Business Development, and has today more than 13,000 independent professionals on assignment. With no professionals employed, Ework can impartially match every assignment with the right skills from the whole market. Ework serves as contract counterparty for both professionals and purchasers of professional services.

Ework Group AB is the Parent Company of the Ework Group. Operational activities are conducted through the Swedish Parent Company, the subsidiary Ework Group Public AB, and subsidiaries in Norway, Denmark, Poland, and Finland. The head office is in Stockholm, and there are regional offices in Gothenburg, Malmö, Linköping, Västerås, Helsinki, Oslo, Copenhagen, Warsaw, Wrocław, Gdynia and Katowice. Ework Group has approximately 370 employees where 30 of them are employed at the Norwegian office.



Ework Group values transparency, ethical responsibility, and sustainable business practices, as highlighted in our Annual Report 2022. Since the Transparency Act is a Norwegian legislation, this report is performed by Ework Group Norway AS and the due diligence process is conducted on our Norwegian Supplier base. However, our management and quality systems are managed from our Parent Company and the work is done in close collaboration with the Group Management. We also strive to use these assessments as an inspiration for how to improve our responsibility work throughout the entire group.

Ework Norway have conducted a due diligence assessment of main parts of our Supplier base. This approach allows us to attain a clear understanding of our potential impact on society and enables us to take necessary measures to address actual and potential adverse impacts on fundamental human rights and decent working conditions. By examining our supply chain and engaging in dialogue with our Suppliers, we aim to mitigate negative consequences associated with our business operations. Through for instance our Code of Conduct we hold ourselves and our Suppliers accountable for upholding fundamental human rights and decent working conditions, and we actively collaborate with our Suppliers to promote responsible practices throughout our network.



In this report, we will provide an overview of our progress on due diligence of our Supplier base. We will focus on due diligence efforts, examining potential adverse impacts within our supply chain and outlining risk mitigating measures. By sharing our actions, challenges, and accomplishments, we aim to build trust, engage in meaningful dialogue, and contribute to a sustainable and socially responsible business ecosystem.

Ework Group use the terms Partners & Professionals to describe our Suppliers and Consultants on assignments in our daily business. However, as the report includes internal Suppliers as for instance Suppliers to our office, we will use the terms Suppliers (on assignment) and internal Suppliers (to our office). The Suppliers on assignment have the main focus due to the large number of them. There are limited number of Suppliers to our office, but they have been assessed as well.

Integration of accountability

Ework Group operates in diverse industries such as IT, engineering, finance, and management consulting. We have an established Code of Conduct that guides our business conduct and emphasizes the importance of upholding fundamental human rights, promoting diversity, and ensuring safe working conditions. Adherence to this Code is a fundamental requirement for all individuals associated with our organization. Additionally, we have a Supplier Code of Conduct for Suppliers, outlining our expectations regarding for instance human rights, labor standards, and ethical considerations. We collaborate with our Suppliers to ensure their awareness and compliance with these principles, promoting responsible practices throughout our supply chain. With over 500 active Suppliers on assignment in Norway, both domestic and foreign, we can positively influence our business environment.

Considering our business we have identified wages and working conditions as the areas within our business with the highest probability of negative impacts.

Our commitment to accountability and transparency is reflected in our guidelines. We conduct due diligence assessments, manage risks, maintain open communication channels, and provide effective complaint mechanisms. We have both internal and external whistleblowing services in order to always secure a safe way to report any unworthy circumstances. In addition, regular review and updating of our guidelines ensure alignment with evolving best practices and regulatory requirements (shared on the intranet and informed directly to persons and functions in order to secure an efficient implementation). Transparency is crucial in building trust with our stakeholders, and we regularly report on our financial aspects, efforts, progress, and challenges in addressing adverse impacts.

Due diligence and risk assessments

Our primary focus is on facilitating the efficient and flexible utilization of skilled professionals in our clients' projects and operations. By connecting businesses with qualified experts, we enable agility, innovation, and cost-effectiveness in project staffing and management. Our services encompass talent sourcing, contracting, and administrative support. Ework Group have had routines for quality assurance of all our Suppliers since the origin of the Company. These routines have been continuously improved, and the improvements have been intensified in alignment with the requirements of the Transparency Act. We have embraced the opportunities of this Act and will continue to use it as a part of our risk assessments and our strategic business management.

To improve our quality assessment processes, we used the OECD guidelines for Due diligence Process & Supporting Measures. These guidelines provide a robust framework for evaluating and managing potential risks related to human rights and working conditions within our supply chain. By using the OECD guidelines as part of the due diligence processes, we aim to continuously enhance our ability to identify and address any areas of concern or potential adverse impacts associated with our operations.

All Ework Group Suppliers (on assignment) must sign our Supplier Code of Conduct. Ework Norway's Suppliers also need to document that they are registered in Norwegian Company registers (if domestic) and that they have Liability and Company insurance. In addition to our formal routines regarding quality assurance of our Suppliers we are in close dialogue with most of our Suppliers and Professionals.

The close relations and dialogue are an important aspect of our business as this is vital in order to deliver the best talents to our Clients but also to ensure that we cooperate with serious and reliable Suppliers who for instance provide their Professionals with decent working conditions.

To ensure compliance with the Transparency Act, Ework Norway conducted a risk assessment of our Supplier base. The assessment gave an overview of the potential risk, by prioritizing what we identified as the highest-risk areas, based on our internal statistics and extensive knowledge, we could proactively address any concerns. We recognize that safeguarding the rights and well-being of all workers, regardless of their origin or contractual arrangement, is of utmost importance.

One area that emerged as a risk during the assessment was wages and working conditions for workers from foreign Suppliers in countries outside the Nordic region. This includes Norwegian Suppliers with Professionals working from other countries outside the Nordic region. We recognized the importance of thoroughly evaluating and addressing any potential risks associated with these specific Suppliers and their Professionals.

Additionally, we identified Suppliers who exclusively provide services through migrated (transferred from another Supplier) or name-given (found by the Client) Professionals. These Suppliers may have been sourced through external channels, and as a result, we may not have the same level of close relationships and oversight with them as we do with other Suppliers sourced by us.

Lastly, we also identified internal Suppliers operating in areas known for challenges related to low wages and risks related to decent working conditions, for example food delivery and transportation.



Monitoring of our Suppliers and measures to mitigate risks

To address and mitigate potential risks, we initiated a Supplier assessment process by sending a letter to chosen Suppliers and internal Suppliers to assess and gather information. The primary objective was to gain insights into the risk of non-compliance with the Transparency Act throughout the Supplier chain. As part of our due diligence efforts, we prioritized the evaluation of geographies where human rights and decent working conditions may be at risk. Where needed, we assessed the involvement of subcontractors in the production or extraction of the services or goods we procure from our internal Suppliers.

In the initial phase of our Supplier assessment, we focused on geographically diverse areas and specific types of work deemed to have a higher risk of non-compliance with human rights and decent working conditions. We also included our largest Norwegian Suppliers and have by now conducted an evaluation of 25 percent of Ework Norway's Supplier base.

By examining a significant part of our Supplier base, we have gained further insights into the practices and operations of our Suppliers across different regions and industries. This assessment has allowed us to identify areas where improvements may be necessary and to engage in constructive dialogue with our Suppliers to address any identified risks or concerns.

We have guided the Suppliers by clarifying our request and requesting additional feedback and documentation to gain a more comprehensive understanding of their approach to employee welfare and their relationships to their own Suppliers. We experienced a good response from most of our Suppliers and we were glad to see that the majority of them were doing their own Supplier assessments. There was a general good focus on compliance to the Transparency Act in our assessed Supplier Base.

For those Suppliers who did not respond within the given time, we have been diligent in reminding them of the importance of their participation and the information we require. We believe in fostering open communication and transparency with our Suppliers, and we strive to ensure that all parties are aligned with the objectives of the Transparency Act. In instances where we have encountered Suppliers whose initial responses were not reassuring in terms of their commitment to responsible practices, we have taken proactive steps and guided them when needed.

During our due diligence process, one of our internal food delivery Suppliers reported that they had identified a breach. However, we are pleased to report that we have maintained a constructive dialogue with the Supplier, and they have provided us with sufficient information to address the breach. The breach has been promptly resolved by the Supplier, demonstrating their commitment to resolving any shortcomings and ensuring compliance with the Transparency Act. Considering the Suppliers transparency and actions we will continue to use this Supplier. We see this as a great example of how to use the Transparency Act in a good way and the importance of the effect of the Act.

Furthermore, we are currently addressing an ongoing concern with another internal Supplier. We have allocated both internal and external resources to actively handle this case and ensure that we reach a suitable resolution in accordance with the requirements of the Transparency Act. We are dedicated to resolving the matter promptly and effectively.

Action plan

In order to mitigate and preferably cease risk of adverse impacts, to always comply with different legislations and to continuously improve our risk management, we have identified the following focus areas:

- To continue and increase the pace of actively engaging with our Suppliers on these matters
- A more comprehensive due diligence of the Supplier base 2023/24
- Improving our routines for controlling our entire Supplier base
- Accelerate the ongoing improvements of internal Policies and documents
- Ensure efficient internal communication and training. E.g. by updating our intranet and hold information meetings and training sessions
- Ensure efficient communication externally. E.g. by actively inform our Suppliers of new Code of Conduct

Action plan

In cases where we have not received any response or the received response was insufficient, we will continue to actively engage with these Suppliers. We will persistently remind them of our requirements and provide a clear description of the information we need. We are committed to upholding high standards of ethical responsibility and ensuring that our Suppliers share the same commitment. If we do not receive a satisfactory response from these Suppliers, we will carefully consider the continuation of our cooperation with them. In such cases, we may need to explore more severe actions to address any potential non-compliance or inadequate adherence to responsible business practices.

Based on this work we are improving our routines for controlling our entire Supplier base in a more extensive matter than we have done in the past, not only as a due diligence process, but in our daily routines. It has become evident that our existing routines for assessing internal Suppliers need improvements to ensure compliance with for instance the Transparency Act. We have taken immediate actions to establish improved protocols and procedures for conducting thorough assessments of our internal Suppliers. These updated routines will enable us to effectively identify and address any potential vulnerabilities or breaches at our Suppliers and help us to avoid Suppliers who do not fully comply to relevant legislations.

The Due diligence process will continue throughout the fall for us to actively control our entire Supplier base, not only the ones where we see the highest risk or highest possibility to influence. We will continue to use the Due Diligence Process & Supporting Measures by OECD throughout this work.

For next year, the due diligence and the requirements from the Transparency Act will be incorporated in Ework Group's Annual report, which is published on our homepage during the spring each year. This underpins our statement of implementing the requirements of the Transparency Act as a part of our business management. The due diligence of our Supplier base will be a central part of our risk assessments moving forward.

These measures will enhance the responsible business conduct not only internally, but we also expect our Suppliers to increase responsibility and transparency in their value chains. A greater insight into the risk areas of our Suppliers will enable us to further reduce risk in our value chain, and improvements of internal routines will enhance our management of Supplier risk. Increased control of risk will enable us to mitigate cooperation with Suppliers with higher probability of actual adverse impacts on human rights and decent working conditions.

For questions or requests for more information, please fill out our Request for feedback-form on our homepage. For Norwegian go [HERE](#) and English go [HERE](#).

Stockholm, Sweden, June 2023
Karin Schreil, CEO

Oslo, Norway, June 2023
Trine Røssel Ødegaard

