

A man wearing a dark baseball cap and a dark t-shirt is shown in profile, looking towards the right. He is seated at a long wooden table. In the background, two other people are seated at the same table, slightly out of focus. The room has a dark blue wall with several large, white, circular decorative elements. The table is set with various items including a bowl of fruit, glasses, and papers.

Spring Family

Code of Conduct

June 2025

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What we believe in



The guiding principle across Spring Family is "Better. Together." We're always striving to improve — in how we treat each other, in the work we do, and in how we show up for customers and stakeholders. And we believe we get the best results when we do it together.

Doing better, together, means setting the bar high — not just for what we deliver, but *how* we deliver it.

We aim to do things the right way. Always.

This Code of Conduct outlines the guiding principles for how we work and interact. It applies to everyone at Spring Family, and everyone is expected to live up to it in their daily work.

Just as we demand high standards from ourselves, we also presume the same from our customers

and the partners we work with. We encourage everyone we do business with to follow the spirit and intent of this Code — and to aim to do what's right.

After all, we can always do **Better. Together.**

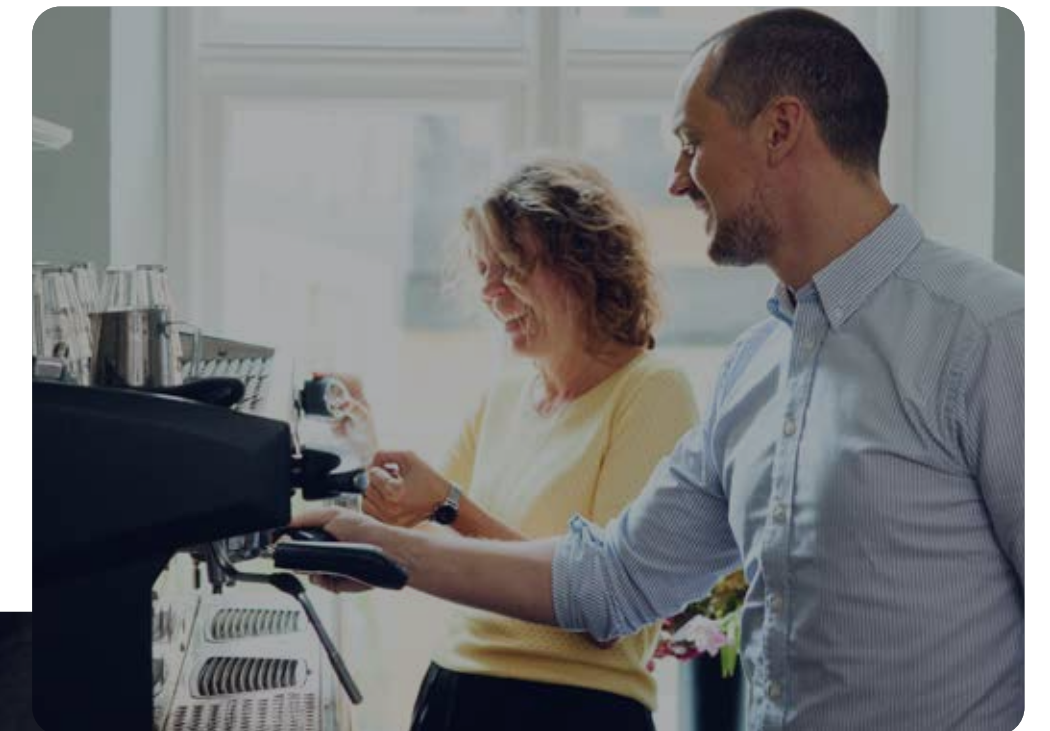
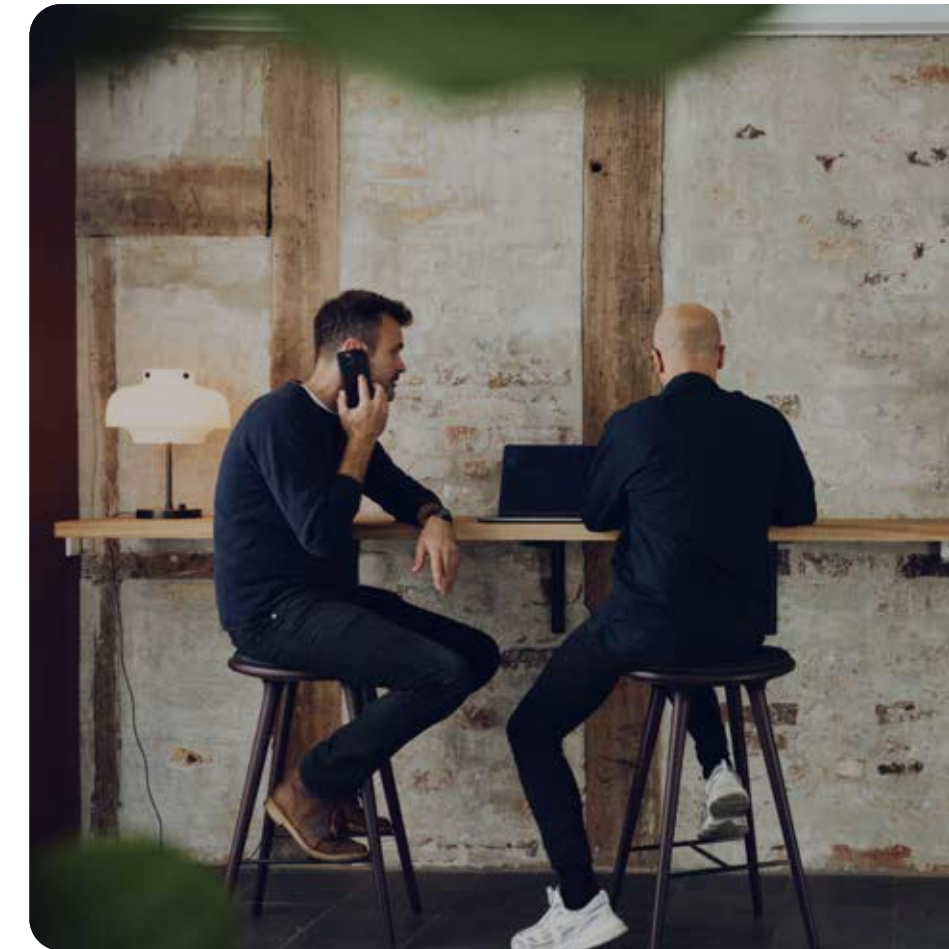
Albert

Scope

This Code applies to all employees under the Spring Family group of companies. It also covers freelancers and other collaborators working on our behalf.

It's a shared set of principles to guide everyday decision-making, helping us act ethically, consistently, and with integrity across countries and clients.

While the Code isn't legally binding for our customers or partners, we expect them to uphold basic standards and conduct their business in line with applicable laws.





1 | Integrity

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Bribery

We have a zero-tolerance policy toward bribery — in any form. Any attempt to shortcut business with a payment or a favour is unacceptable. Bribes may take different forms — but the intent is always the same.

Corruption

As with bribery, we don't tolerate corruption — including any situation where public officials are rewarded or incentivised to grant favours.

Gifts and entertainment

We're proud of the close relationships we build with partners. Hospitality and a warm attitude are part of who we are — but we never lose sight of our objectivity.

Gifts and entertainment are ways to nurture relationships — not to gain an unfair advantage. They must always be reasonable and proportionate to the level of business we do together.

Conflict of interest

If there's any potential conflict of interest — or suspicion of such — we expect our people and partners to speak up quickly and openly.

Online behavior

An online presence is part of professional life today. But we expect employees and stakeholders to act respectfully and responsibly — and use a tone that reflects who we are.

A blurred office scene with a person at a desk and a notebook in the foreground. The person is wearing a blue shirt and is looking at a laptop. The notebook is open and has some handwritten notes. The background is out of focus, showing other people and office equipment.

2 | Governance, legal and compliance

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Confidentiality

We place high value on confidentiality. Employees must treat sensitive information with care and protect it accordingly. We expect the same from anyone who has access to Spring Family's confidential information.

Competition

All employees must follow applicable competition laws. With a diverse customer base — including competitors — we keep a firm grip on how we handle information to ensure our integrity is never in doubt.

The same goes for our customers and partners.

Transparent accounting

We maintain full, accurate and transparent records — across finances, time-logging, purchasing, invoicing and budgeting. We have tools and procedures in place to support integrity and consistency across business units.

Sanctions and export control

We adhere to applicable sanctions and export controls in the countries we operate in — and expect our customers and partners to do the same.

Privacy, data protection and AI

Our people — employees and collaborators — are the heart of our company. We protect that value by ensuring compliance with privacy and data protection laws wherever we operate.

As a creative company, we're always exploring new tools — including AI. But we use only pre-screened and approved AI tools, and we apply the same standards across our business units.

A photograph of three people in a meeting. A woman with glasses and a dark top is on the left, a woman with long blonde hair in a white patterned top is in the center, and a man is partially visible on the right. They are all looking at each other and smiling. The background is a blurred office setting.

3 | Human rights, diversity and inclusion

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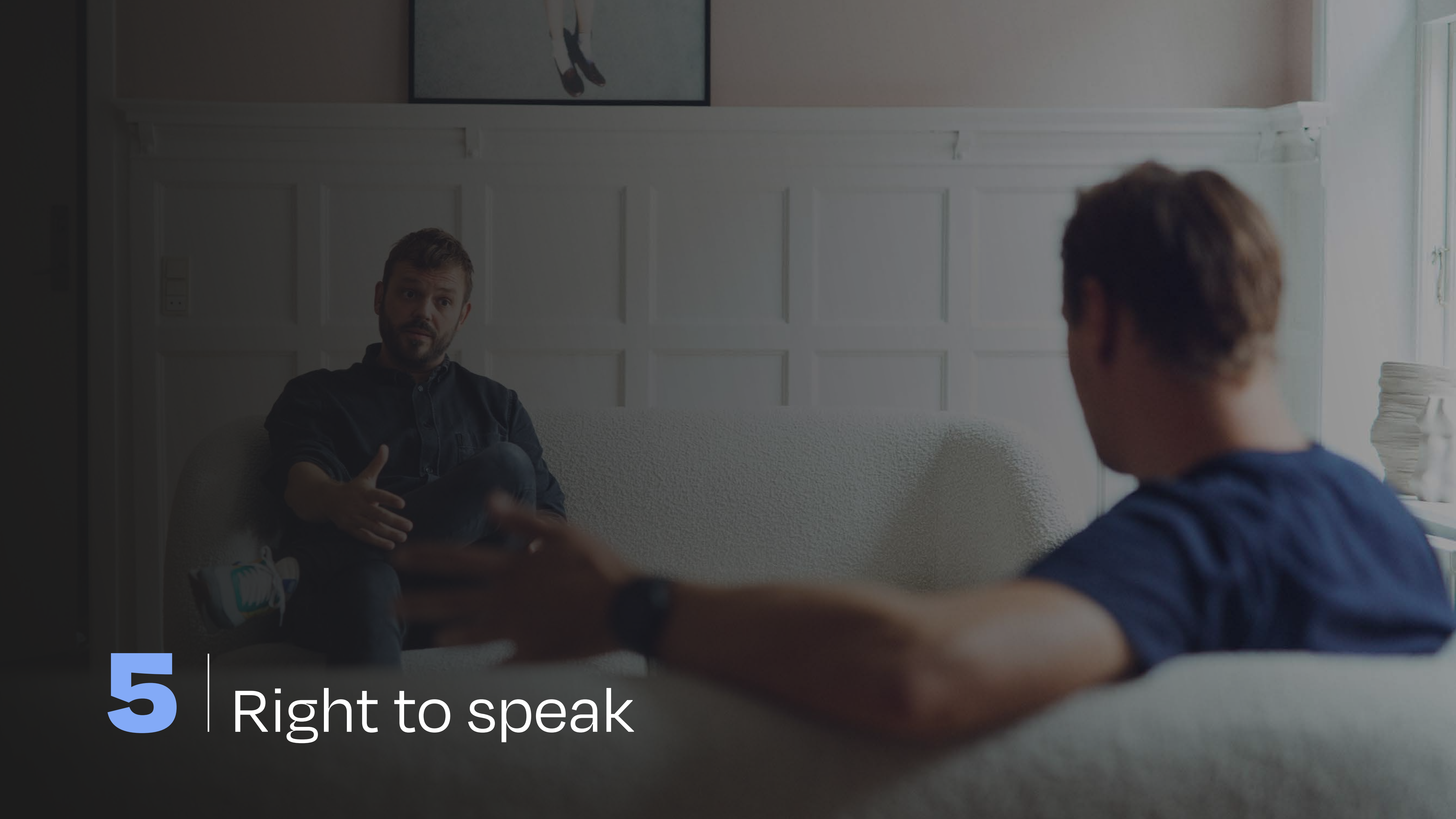
We respect and support internationally recognised human rights, including the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

We work actively across our company to ensure we meet all applicable laws and guidelines. In addition, we have measures in place to support employee well-being, satisfaction and ongoing development — so our people can thrive both personally and professionally.

4 | ESG

We've set up a dedicated working group to drive ESG efforts across the company. The group maps initiatives, which are then launched and implemented by employees. We publish a yearly report on our progress, available at:

<https://www.zupa.dk/environmental-policy>

A man with a beard and short hair is sitting on a light-colored couch, gesturing with his hands as if in conversation. He is wearing a dark button-down shirt. In the foreground, the back of another person's head and shoulders are visible, showing they are wearing a blue t-shirt. The background features a white paneled door and a framed picture of a person's legs on the wall. The scene is dimly lit, with a dark overlay at the bottom.

5 | Right to speak

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We have a whistleblower channel, available here: <https://zupa.indberet.nu/>

We expect employees, customers, and partners to sound the alarm if they come across any action — or inaction — that might merit investigation.

All reports are treated with care and full anonymity.