



## Modern Slavery Act Statement

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Head of Corporate Compliance/Head of Sustainability

Board of Directors

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Group

# Modern Slavery Act Statement

## 1. Background

This statement is made by Viaplay Group AB pursuant to the requirements of Section 54 of the Modern Slavery Act 2015. The statement outlines the activities undertaken by Viaplay Group to identify and mitigate the potential risk of modern slavery related to its business operations and supply chain during the financial year ending December 2021.

This statement was approved on 7 February 2022 by Viaplay Group's Board of Directors.

## 2. Business, structure and supply chain

Viaplay Group is the Nordic region's leading entertainment provider and one of the world's fastest growing streaming companies expanding globally. Viaplay Group's premium online video streaming service and a leading on-demand streaming service in Europe is Viaplay. Available in Sweden, Norway, Denmark, Finland, Iceland, Latvia, Lithuania, Estonia and Poland, Viaplay offers live sports, the latest international TV releases, original drama, all-time classics and film premieres, as well as kids' most-loved animation and series.

Viaplay's expansion is upcoming in the US and the Netherlands; to then launch in the UK, Canada, Germany, Austria and Switzerland, and be available in total of 16 countries by end of 2023. Headquartered in Stockholm, Viaplay Group is listed on Nasdaq Stockholm ("Viaplay A" and "Viaplay B").

The company's subsidiary in the United Kingdom is Nordic Entertainment Group UK Ltd. In 2021, Viaplay Group moved the registrations for its streaming platforms and the broadcast licenses for its TV channels to Sweden from the UK to ensure that Viaplay Group's services will remain available to viewers after the expected withdrawal of the UK from the European Union (EU), making these offerings now regulated by the Swedish Press and Broadcasting Authority (MPRT).

Viaplay Group's supply chain mainly consists of suppliers of content, IT hardware, software, and services. Read more about Viaplay Group at: [www.viaplaygroup.com](http://www.viaplaygroup.com).

### 3. Relevant policies

As a responsible global business, Viaplay Group is committed to acting in accordance with international initiatives and standards such as the Fundamental Conventions of the International Labour Organisation, the UN Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights. Viaplay Group is a signatory of the UN Global Compact and is committed to the Sustainable Development Goals Media Compact and the Women's Empowerment Principles. The following Viaplay Group Policies describe the company's approach to slavery and human trafficking:

**Employee Code of Conduct:** Viaplay Group's (Employee) Code of Conduct forms the backbone of Viaplay Group's work with human rights and labour rights. The Code sets out the standards with which all Viaplay Group employees are expected to comply. It emphasises the company's commitment to providing a professional environment with fair working conditions in line with universal human and labour rights standards, applicable laws, and agreements on working hours and compensation. Everyone at Viaplay Group is free to join associations or unions, and to bargain collectively or individually. The Code expressly states that child labour, or forced labour at any age, is not tolerated at Viaplay Group. The Code of Conduct can be found [here](#).

**Supplier Code of Conduct:** Viaplay Group is committed to ensuring that its suppliers adhere to the highest ethical standards. Viaplay Group's Supplier Code of Conduct sets out the standards with which all Viaplay Group's suppliers are expected to comply. The Code is included in Viaplay Group's contracts with new suppliers. Under the Supplier Code of Conduct, suppliers are required to provide fair working conditions that are free from discrimination and inhumane treatment. The Supplier Code of Conduct also expressly prohibits modern slavery, forced or child labour, or other forms of exploitation. Under the Supplier Code of Conduct all Viaplay Group's suppliers are expected to impose the same standards on their own suppliers. The Supplier Code of Conduct can be found [here](#).

Viaplay Group's Code of Conduct and Supplier Code of Conduct are reviewed and updated regularly to reflect changes in the company's operations and its legal and regulatory environment. All employees have been asked to sign the Employee Code of Conduct electronically. At the end of 2021, 95% of all employees had signed the Code. Both Codes are due for review in 2022.

**HR policies and procedures:** [Viaplay Group's People Policy](#) and [Work Environment Policy](#) set out the core elements of the company's people strategy, including working conditions. The company has zero tolerance for any form of discrimination or harassment which is reflected in the [Group's Equality and Diversity Directive](#) and [Group's Non-discrimination and Anti-harassment Directive](#). These directives emphasise that everyone at Viaplay Group should be treated with respect and dignity and should not be victimised or subject to harassment. Viaplay Group's People & Culture function reviews the company's policies and directives annually and strives to ensure that the working conditions of employees and subcontractors in every part of Viaplay Group's businesses are compliant with all applicable employment and human rights laws. Every Viaplay Group business area has a dedicated People & Culture Business Partner who provides continuous support and guidance on all HR policies and directives.

**Whistleblower Directive:** Viaplay Group encourages all individuals working at all levels of its organisation to report any conduct they believe to be a violation of Viaplay Group's Code of Conduct, Group policies/directives, or applicable laws and regulations. This includes any circumstances that may give rise to a heightened risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for employees to report concerns without fear of retaliation. Viaplay Group employees can report a concern anonymously by using the Speak-Up Line, which is operated by an independent third party. Suppliers, customers, and other partners involved with Viaplay Group, may also report suspected violations of laws or the Code of Conduct. The Whistleblower procedures are under review and will be amended to ensure compliance with EU's Whistleblowing Directive by 17 July 2022, a deadline imposed by Swedish national law.

#### 4. **Risk assessment and due diligence processes**

As noted above, Viaplay Group's Supplier Code of Conduct is being included in contracts with new suppliers (including their employees, consultants and sub-contractors). Violations of the Supplier Code of Conduct will lead to Viaplay Group reviewing and potentially ending the business relationship. At the same time, the Supplier Code of Conduct encourages suppliers to report any ethical concerns or suspected cases of non-compliance with the Code.

In 2020, Viaplay Group launched its enhanced Supplier Due Diligence Process for "high risk suppliers" who can potentially cause adverse impacts to Viaplay Group's business. The process for identifying "high risk

suppliers” is based on four criteria: (i) annual contract turnover, (ii) type of product/service, (iii) dependency of the product/service, and (iv) where the supplier operates. High risk suppliers have been asked to respond to an online Supplier Due Diligence Questionnaire that includes questions about which policies/processes that the supplier have in place relating to e.g., fair working conditions, corruption, health & safety, and environment.

As reported in Viaplay Group’s last statement, Viaplay Group will, based on the input received from the Supplier Due Diligence Questionnaire, decide whether further actions are required to secure compliance with its ethical standards. This could be requests for additional information or performance of on-site audits.

Viaplay Group has also established an annual onsite-audit programme to ensure responsible content production. Audits of productions will be annually conducted and cover the requirements set out in our Supplier Code of Conduct, with a specific focus on human rights and labour rights.

Suppliers with identified non-compliance issues may receive corrective action plans with time frames for follow up, depending on the severity of the issue. As stated in Viaplay Group’s Supplier Code of Conduct, failure to comply with Viaplay Group’s standards and the provisions set out in the Code may result in Viaplay Group ending its business relationship with the supplier in question.

## 5. Training

Viaplay Group requires all employees to complete an internal training program that includes Code of Conduct e-learning. Amongst other areas, this training addresses risks related to sustainability. At the end of 2021, about 85% of all employees had completed the e-learning.

Stockholm, 2022-02-07



Anders Jensen  
President and CEO, Viaplay Group AB