



viaplay
GROUP

Modern Slavery Act Statement

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Applicability

Head of Group Compliance & Head of Sustainability.

Board of Directors

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Group

Modern Slavery Act Statement

1. Background

This statement is being produced by Viaplay Group AB in accordance with the obligations set out in Section 54 of the Modern Slavery Act 2015 of the United Kingdom. This statement provides an overview of the efforts made by Viaplay Group to address and minimize the potential risk of modern slavery in its business operations and supply chain.

2. Business, structure and supply chain

Viaplay Group AB (publ) is the Nordic region's leading entertainment provider. Every Nordic country, along with the Netherlands and Poland, offers our Viaplay streaming service, and partner platforms worldwide have incorporated our Viaplay Select branded content concept. We also operate TV channels across most of our markets, as well as radio stations in Norway and Sweden. Our talented people come to work every day with a shared passion and clear mission to entertain millions of people with our unique offering of locally relevant storytelling, which spans premium live sports, films, series, and music. Our goal is to grow our business profitably and responsibly while providing long-term value to all of our stakeholders. Nasdaq Stockholm lists Viaplay Group under the symbol 'VPLAY B'.

The company's subsidiary in the United Kingdom is Viaplay 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 remained available to viewers after the 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.

3. Relevant policies

Viaplay Group, a responsible global business, 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 to 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.

Supplier & Business Partner Code of Conduct: Viaplay Group is committed to ensuring that its suppliers adhere to the highest ethical standards. Viaplay Group's Supplier & Business Partner Code of Conduct sets out the standards with which all Viaplay Group's suppliers are expected to comply. It is included in Viaplay Group's contracts with new suppliers. Suppliers are required to provide fair working conditions that are free from discrimination and inhumane treatment. It also expressly prohibits modern slavery, forced or child labour, or other forms of exploitation.

Viaplay Group's Code of Conduct and Supplier & Business Partner Code of Conduct are reviewed and updated regularly to reflect changes in the company's operations and its legal and regulatory environment. All employees are asked to sign the Employee Code of Conduct, and undertake the mandatory yearly training on the Code of Conduct.

Human Rights Policy: Viaplay Group Policy applies to all employees of entities or subsidiaries in which Viaplay Group exercises control (either directly or indirectly). The Group seeks to honour internationally recognised human rights principles everywhere and at all times, and works to ensure that it does not infringe upon human rights, avoids complicity in human rights abuses by others, and complies with the laws of the countries in which we do business. The group promotes human rights in the workplace, protects and upholds freedom of thought, speech, expression, and association, and respects the right to privacy.

People and culture 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 group's Equality and Diversity Directive and Non-discrimination and Anti-harassment Directive reflect the company's zero tolerance for any form of discrimination or harassment. These directives underscore the importance of treating everyone at Viaplay Group with respect and dignity, preventing victimization or 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 & Sustainability 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 and 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 has designed its whistleblowing procedure to enable employees to report concerns without fear of retaliation. An independent third party operates the Speak-Up Line, enabling Viaplay Group employees to anonymously report concerns. Suppliers, customers, and other partners involved with Viaplay Group may also report suspected violations of laws or the Code of Conduct. The whistleblower procedures have been implemented and will be continuously updated to ensure compliance with the EU Whistleblowing Directive 2019.

Risk assessment and due diligence process

Viaplay Group's Supplier and Business Partner Code of Conduct is a part of all third-party engagements. If third parties violate the Supplier and Business Partner Code of

Conduct, Viaplay Group will review and potentially terminate the business relationship. At the same time, it encourages suppliers to report any ethical concerns or suspected cases of non-compliance.

Viaplay Group ensures thorough due diligence when entering into agreements or procuring services from significant third parties. The process for identifying significant suppliers is determined by various factors, including jurisdiction, product/service, and annual contract turnover, among other criteria. Enhanced due diligence is conducted for suppliers classified as high risk suppliers, which may sometimes involve conducting onsite audits. In addition, Viaplay Group has implemented an annual onsite-audit programme to guarantee responsible content production. Annual audits will be conducted on productions to ensure compliance with our Supplier Code of Conduct, with a particular emphasis on human rights and labour rights. Suppliers who have been found to have non-compliance issues may be provided with corrective action plans, which will include specific time frames for follow-up. The severity of the issue will determine the urgency of the required actions. Non-compliance with Viaplay Group's standards and the provisions outlined in the Supplier & Business Partner Code of Conduct may lead to the termination of the business relationship between Viaplay Group and the supplier involved.

4. Training

Every employee at Viaplay Group is required to finish an internal training programme that includes e-learning on the company's Code of Conduct and also covers human rights.

Stockholm, 2023-06-27



Jørgen Madsen Lindemann,
President and CEO, Viaplay Group AB