

# Code of Conduct



viaplay  
GROUP

# 1. What we stand for

We prioritise people. Our values are Bravery, Equality, Appreciation, and Trust. Our aim is to be the preferred employer, provider, and partner of choice.

## WE ARE THE HEARTBEAT OF ENTERTAINMENT

We are a company that prioritises people — from our thousands of employees to our millions of customers. At Viaplay Group, we are united by our passion for creating meaningful moments, while creating sustainable value for all our stakeholders. We share four values: Bravery, Equality, Appreciation and Trust. Our aim is to be an employer, provider and partner of choice.

This Code of Conduct reflects who we are. It is a practical guide to how we do (and don't do) business, and helps us to navigate any ethical or legal situations and questions we may face at work.

We are committed to promoting values that foster human rights and acting honestly and with integrity, as well as conducting our business in full compliance with all applicable laws and regulations — and to achieving exceptional standards of corporate and social responsibility. Responsibility is at the core of Viaplay Group's business, and is closely integrated with our strategy, values and culture. As a responsible global business, we are committed to international initiatives and standards such as the OECD Guidelines for Multinational Enterprises,

the Fundamental Conventions of the International Labour Organisation (ILO), the UN Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human

We are a signatory of the UN Global Compact. We honour internationally recognised human rights principles everywhere and at all times. We continuously work to ensure that we do not infringe on human rights, and that we avoid complicity in human rights abuses by others.

Each of us is responsible for being familiar with and acknowledging this Code. We are responsible for seeking guidance when we need advice regarding its principles, when we want to raise concerns, or when we are unsure whether certain conduct is acceptable.

For further information and contact details, see Raising concerns (section 7) and Ethics checklist and contact information (section 8) in this Code.

## 2. Committing to our people and our world

Everyone at Viaplay Group expects and gets equal opportunities.

We understand, respect, and value each other's differences.

### Equality, diversity, and inclusion.

We embrace equality, diversity, and inclusion. When it comes to recruitment, promotion and training, what counts is competence, experience, attitude, ambition, and performance. We believe that successful teams are diverse teams. We understand, respect and value each other's differences. We do not tolerate discrimination, bullying, victimisation or any kind of harassment.

### Fair working conditions.

We provide a professional and fair working environment in line with universal human and labour rights standards, applicable laws, and agreements on working hours and compensation. These universal standards and applicable laws are a minimum standard for us that we strive to exceed. Everyone at Viaplay Group is free to join associations or unions, and to bargain collectively or individually. Child labour, or forced labour at any age, is not tolerated in our business or supply chain; everyone at our company has completed compulsory education before joining.

### Wellbeing, health and safety.

At Viaplay Group, employees' wellbeing, health, and safety form an integral part of our values and daily operations. We provide a safe working environment that promotes a healthy physical and psycho-social working environment and wellbeing. Our offices, facilities and other operation locations comply with all applicable health and safety regulations.

We have established a hybrid working model that allows for greater employee flexibility. When our employees come to the office or travel for business, we want them to be always supported and safe. We have therefore implemented processes and programs that aim to keep our people informed and secure, when working from our offices, when travelling for business or working remotely. Our aim is that everyone enjoys and has a healthy work-life balance, so we discourage work outside office hours.

## Protecting our environment.

Our planet is our home. Viaplay Group works to minimise its impact on the climate and environment across our operations and entire value chain. We take climate change into consideration in our risk management process, and incorporate these concerns in our targets, strategy, and governance structure.

We nurture and safeguard the environment by keeping track of our carbon footprint, mapping our energy use, and tracking our recycling of waste while reusing equipment wherever possible. We are committed to the Science Based Targets Initiative and have set emission reduction targets aligned with the goals of the Paris Agreement which we follow up on by measuring and reporting on our direct and indirect emissions.

We engage our entire company in reaching these targets. We are committed to developing environmentally sustainable production practices as well as partner in our industry to address climate issues in productions and streaming. Sustainable travel is also a key element of Viaplay Group's environmental work; as such we prioritise low-emission travel such as taking the train instead of flying wherever possible or alternatives to travel, such as video conferencing.

If you have questions or concerns, contact your line manager, People & Culture, or Viaplay Group's Sustainability team.

# 3. Protecting our assets

Every asset must be kept safe.  
When something is not public, we keep it private.  
We use work assets for work.

## Protecting our assets safeguards our business.

The content we show on our platform is one of Viaplay Group's most obvious assets. But we have even more assets like our software, our computer systems and the information stored on our devices (including desktops, laptops, phones, etc). Our intellectual property, strategic plans and customer data are assets too and so are the Viaplay Group name and our logos. We expect all employees to safeguard our intellectual property and only make proper use of information or assets shared with them. Every asset enables the success and sustainability of our business in some way. This means that we are all responsible for protecting and using them correctly.

## Our IT assets.

We should only use Viaplay Group's company email, intranet and internet connectivity and devices for authorised business purposes. A reasonable amount of private usage is allowed — provided it does not negatively affect your work or contradict this Code of Conduct. That means, we do not access, display, download or share inappropriate content or information when using our IT environment. This applies to material that is illegal, offensive, harassing, racially or sexually discriminatory in nature, or otherwise inconsistent with a professional and ethical environment. We are careful when opening attachments or links in emails or on sites that are not related to our business, or from any source that we do not recognise. Using personal software on a work computer, or modifying our software, is a security risk and requires the approval of the IT department.

## Confidential information.

As part of our work, we may have access to information about Viaplay Group that is not available to other people within or outside the organisation. This can include financial data, business plans, contracts, employee, customer or supplier details. If the information is not public, it must be treated as restricted, confidential or secret depending on its sensitivity and access to it is restricted. We protect confidential information from improper use and do not share it — even with colleagues — unless authorised to do so. We have proper access controls in place at all times to secure only authorised access to our systems and confidential information and perform regular reviews of access rights. The management of user accounts and privileges on systems is restricted to suitably trained and authorised members of staff.

## If we leave Viaplay Group.

Leaving Viaplay Group requires you to return all your work-related equipment and assets. That includes for example your computer, phone and any copies of files you may have accumulated during your time working here. It's important to remember that confidential information stays confidential, even after you leave the company. The same applies even if you are in businesses that have been fully or partially divested.

If you have questions or concerns, contact your line manager, Viaplay Group's VP IT & Information Security, or Head of Group Compliance.

# 4. Doing business, the right way

We act with honesty and integrity.

We do not give or accept bribes.

We avoid conflicts of interest.

We compete fairly.

## Responsible content & productions.

We have an opportunity to use the power of storytelling to create positive impacts for people, society, the climate and the environment. We embrace principles such as freedom of expression, privacy, editorial independence and universal service accessibility. We promote plurality, diversity and inclusivity – our content reflects a wide range of perspectives and challenges stereotypes. We protect younger viewers through careful programme placement and tools such as child profiles that help keep children safe from unsuitable material. We rigorously scrutinise all the content we publish and follow applicable laws regarding illegal and unsuitable content. We are committed to making our content available to all by increasing the amount of accessible content available on our platforms through subtitles, audio description and sign language.

Behind the camera, we ensure that our content is produced responsibly and that we continuously improve our work with human rights, health & safety, and labour rights as well as regularly follow up on progress with our production teams.

## Editorial independence.

We ensure that all content on our platforms is subject to our editorial control. This means that we always maintain a distinction between editorial content and advertising and protect our viewers and content from any undue influence from interested parties or advertisers.

If you have questions or concerns, contact Viaplay Group's Head of Content Compliance.

## Anti-bribery and corruption.

A bribe is not just cash in an envelope. It can be the provision of anything of value – including cash or equivalents, gifts, paid expenses, entertainment, kick-backs, favours or loans – in return for certain actions or benefits. We do not tolerate any form of bribery, corruption or inducement to act improperly.

Everyone working for – and on behalf of – Viaplay Group is expressly prohibited from giving, receiving, offering or promising anything of value to influence business decisions or to gain an improper business advantage. The same goes for requesting, accepting or receiving a bribe.

Employees must abide by Viaplay Group's Anti-bribery & Corruption Policy and obtain all necessary approvals in relation to gifts & hospitality beforehand. Nobody at Viaplay Group will ever face punishment of any kind for refusing to pay a bribe or for highlighting corruption – we expect honesty and integrity from each other and from our business partners.

### Conflicts of interest.

We avoid and eliminate conflicts of interest. An employee has a legal duty to act solely for the benefit of the employer when engaging in any conduct that relates to the employment. This includes taking active measures to avoid situations where conflicts of interests may arise, and to report such situations. or Viaplay Group's Head of Group Compliance. Common types of conflicts of interest include maintaining external directorships or significant shareholdings in suppliers, customers or competitors; employing family members or friends; or using a supplier in which a relative or close friend has a significant role or financial interest. To clear a conflict of interest, or to confirm whether a conflict exists, seek advice from Viaplay Group's legal counsels or Viaplay Group's Head of Corporate Compliance.

If you have questions or concerns regarding anti-bribery and corruption or conflicts of interest, contact Viaplay Group's Head of Group Compliance.

### Fair competition.

We compete vigorously but fairly. We are committed to free and open competition, and we abide by relevant competition laws wherever we do business. We expect the same high standards from each other. We never agree with a competitor to limit how we compete with one another. That means: no price fixing; no agreements to split markets or customers; and no bid-rigging arrangements with our competitors. Competition laws also prohibit the abuse of dominant market positions.

### Representing Viaplay Group.

Wherever we are in the world, we always behave as ambassadors for Viaplay Group, and we respect local cultures at all times.

### Sanctions.

Most countries as well as the United Nations and European Union have adopted laws regulating international business activities and sanctions. Some of these laws prohibit business dealings with specific sanctioned countries, companies or individuals. The rules may restrict transfer of assets, monetary payments or provision of services to these sanctioned countries or parties.

To avoid breaching these rules, as well as to steer clear of other illegal practices such as money laundering, fraud, corruption, or any other illegal acts, we must make sure to know our business partners — including who owns or controls them, what business they do and where, and their reputation.

### Human rights and interacting with business partners and suppliers.

We respect human rights and the interests of Viaplay Group's employees and third parties — and we only work with business partners and suppliers who do the same. We have a policy and due diligence processes in place to identify, prevent, mitigate and account for adverse human rights impacts we might cause, contribute to or be linked with. Acting upon human rights impacts includes taking appropriate steps to avoid, minimize and/or mitigate them. We follow our Code of Conduct when interacting with current and prospective business partners and suppliers and we ensure that they are aware of — and act in accordance with — our Supplier and Business Partner Code of Conduct.

### Interacting with policy makers and public officials.

Viaplay Group's interaction with policy makers and public officials is handled by the Public & Regulatory Affairs team. We are following the practices on anti-bribery and corruption, fair competition, and representation in relation to any contacts and cooperation with government officials, civil servants, trade associations as well as in regard to other lobbying activities, and we avoid conflicts of interest.

If you have questions or concerns, contact Viaplay Group's Head of Group Compliance.

## Tax.

Viaplay Group's business is based on commercial considerations and our tax approach is based on our values. We conduct our business in compliance with applicable tax and accounting laws and regulations, as well as guidelines issued by relevant tax authorities including international guidelines and principles set by the Organisation for Economic Cooperation and Development and the United Nations. All our employees must comply with the above when carrying out business in the name of, or on behalf of Viaplay Group. Hence we do not tolerate engagement in the performance of, or facilitation of tax evasion, nor in committing tax fraud.

If you have questions or concerns, contact a member of our tax team. If you wish to report related matters, please use our whistle-blowing channels.



# 5. Handling information the right way.

We work responsibly when handling personal data.

We keep inside information in-house.

We let our communication team take the lead on communication.

## Data protection.

At Viaplay Group, respecting the right to privacy is at the forefront of everything we do. We protect all personal data entrusted to us, and we comply with all data protection laws and regulations wherever we operate.

We process personal data about our employees, customers and business partners for defined purposes, such as administrative and commercial purposes. We make sure that we only collect, access or process personal data that we need to conduct our business, and only for the purpose for which it is intended.

We do not retain personal data longer than it is necessary to fulfil the purpose and also ensure that data is always kept secure. We are transparent in the way we handle data in a clear and comprehensible manner.

## Business information and communication.

As a publicly listed company, we have an obligation to provide business information to our stakeholders on a regular basis. Our public communication and disclosure are always full, fair, timely and accurate.

All financial transactions are handled with designated authorisations, and accurate and complete recordkeeping of our business transactions is essential to the successful operation of our Group. Our records form the basis of Viaplay Group's public disclosure and are also used in our internal decision-making processes.

To ensure that our financial statements accurately reflect Viaplay Group's asset base and transactions, we are responsible for ensuring that all information we submit to company records is complete and accurate;

whilst also having appropriate internal controls and processes to ensure that accounting and financial reporting complies with legislation and regulatory requirements. If asked (online or offline, in or out of the office) about Viaplay Group's views or statements by any external party, we pass the request on to Viaplay Group's Corporate Communications team. This team is responsible for commenting publicly on matters such as strategy, performance, news and opinions.

If you have questions or concerns, contact Viaplay Group's Head of Group Compliance, the Finance, or Communications department. If you witness or suspect related misconduct, please use our whistle-blowing channels.

## Insider trading.

If we have access to information about Viaplay Group (or about a customer, partner or supplier) that is not available outside the company — and this information would be likely to have a significant effect on Viaplay Group or another company's stock price if it was made public — then we do not share this information, conduct any transactions based on this information, suggest that anyone else conducts such transactions, or change any orders that have already been placed.

If you have questions or concerns, contact your line manager or Viaplay Group's General Counsel. If you witness or suspect related misconduct, please use our whistle-blowing channels.

# 6. Raising concerns.

We take all concerns seriously.  
We speak up without fear of retaliation.  
Our independent reporting system enables confidential and  
anonymous reporting.

## A culture of openness.

Viaplay Group promotes a culture of openness, responsibility and accountability. We expect you to tell us immediately if you believe a violation of our Code of Conduct or applicable laws has taken place or will take place in the future — doing so makes an essential contribution to the sustainability of our culture. All concerns will be taken seriously and investigated appropriately. Managers are responsible for encouraging and creating an environment for an open dialogue, as well as for supporting employees by addressing all concerns raised directly with them in a fair and unbiased manner; and when appropriate to the type of concern, referring the employee to the whistle-blowing channel. We want everyone to feel comfortable raising concerns without worrying about a negative reaction.

## How to raise concerns.

Viaplay Group encourages employees to raise concerns at the earliest possible stage. You can always raise a concern with your manager or manager's manager if you do not believe that the concern has been, or will be, dealt with appropriately. You can also report people related concerns to the People & Culture team. Certain incidents that fall within the scope of our Whistle-blower Directive should be reported using our whistle-blower channels, which include an independent, confidential, and anonymous reporting system. More information about our whistle-blower channels can be found in Viaplay Group's Whistle-blowing Directive and on our intranet.

If you have questions about reporting people related concerns, contact the People & Culture team, or contact Viaplay Group's Head of Group Compliance for advice on whistle-blowing and related whistle-blower incidents.

# 7. Ethics checklist and contact information.

## OUR CODE IS OUR COMPASS

You are responsible for familiarising yourself with this Code of Conduct — and for seeking guidance if you are unsure whether a course of action is the right one. The ethics checklist to the right is a helpful tool. In addition to this Code of Conduct, Viaplay Group has adopted Group Policies, Directives and Guidelines providing further information about the areas covered by this Code; these are available on our intranet and everyone has a responsibility to comply with them throughout the course of the employment.

For more information, please contact Viaplay Group's Head of Group Compliance at [compliance@viaplaygroup.com](mailto:compliance@viaplaygroup.com).



Is it legal and does it comply with our policies?



Would I be comfortable if it was shared with others?



Does it feel right?

*If the answer to the above questions is "No" or "I am not sure" you need to take a different course of action or pause to ask for help using the contact information in this Code depending on your type of concern*

# 8. Appendix - Form of acknowledgement.

Note: Acknowledgement should primarily take place electronically. If you use paper acknowledgement, please give the signed copy to your local People & Culture representative.

I, the undersigned, certify that I have received and read the Viaplay Group Code of Conduct, and that I understand and accept my responsibility to comply with this Code.

I understand that my agreement to comply with this Code does not constitute a contract of employment.

I am aware that this Code is subject to annual updates, and I understand and accept my responsibility thereof to duly sign any updated version of this Code communicated to me by my employer.

Date:

Signature:

Name:

Company: