



Group Human Rights Policy

Document owner

Approval

Initially adopted

Date last approved

Date of next review/approval

Applicability

Head of Sustainability

Board of Directors

22 September 2022

25 September 2026

Q3 2027

Group

Group Human Rights Policy

1. Purpose

This policy outlines Viaplay Group's commitment to promoting and protecting human rights in its operations, across its supply chain and beyond by identifying, preventing, mitigating, and accounting for and managing impacts, risks, and opportunities related to human rights.

We follow OECD Guidelines for Multinational Enterprises on responsible business conduct and are committed to the UN Global Compact's principles in areas of human rights, labour rights, environment and anti-corruption. We respect human rights in accordance with internationally accepted standards and expect the same from our partners and suppliers. We support the UK Modern Slavery Act and are committed to implementing the United Nations Guiding Principles on Business and Human Rights.

2. Target Group

This Group Policy applies to all employees of entities or subsidiaries in which Viaplay Group exercises control (either directly or indirectly).

3. Principles

3.1. Approach

We seek to honour internationally recognised human rights principles everywhere and at all times, and we work to ensure that we do not infringe human rights, that we avoid complicity in human rights abuses by others and that we comply with the laws of the countries in which we do business. We promote human rights in the workplace, we protect and uphold freedom of thought, speech and expression, and we respect the right to privacy.

We strive to uphold global standards for responsible business, including diversity, inclusion, equality, the freedom to associate and bargain collectively, and the elimination of discrimination, harassment, modern slavery, human trafficking and harmful or forced labour and exploitative forms of child labour. We conduct our business and promote human rights through our governing framework which sets standards for our operations through our:

- *Employee Code of Conduct*
- *Group Sustainability Policy*
- *Group Equality & Diversity Directive*
- *Group Non-discrimination & Anti-harassment Directive*
- *Third Party Code of Conduct*

3.2. Salient Human rights risks

Viaplay Group's salient human rights risks are the human rights areas where our activities, business relationships, products and services may have the most severe potential or actual impact on people, including employees, contractors, production workers, suppliers, business partners, contributors, audiences and other affected stakeholders.

Based on our business model, sector, markets and value chain, Viaplay Group considers the following areas to be among its most relevant salient human rights risks:

- Labour rights, working conditions and health and safety,
- Discrimination, harassment and equal treatment,
- Privacy and data protection,
- Child protection, responsible content practices and accessibility,
- Supply chain human rights risks, including responsible sourcing and supplier labour conditions.

Viaplay Group regularly reviews its salient human rights risks through its due diligence and risk management processes. Where adverse impacts are identified, we seek to prevent, mitigate and address them, including through remediation where appropriate and by using our leverage with business partners and suppliers.

3.3. Sustainability Due Diligence

Viaplay Group is committed to building and maintaining strong relationships with suppliers and business partners who uphold ethical standards aligned with our own. To ensure compliance with our human rights commitments and to proactively address potential risks, we have established a risk-based due diligence process that applies across our operations and supply chain. Additionally, we are committed to mitigating and remedying any breaches to standards that do occur.

This process includes:

- Identifying and assessing actual and potential adverse human rights and environmental impacts.
- Implementing measures to prevent or mitigate identified risks.
- Monitoring the effectiveness of these measures.
- Publicly communicating our due diligence efforts.

Significant third-party relationships are subject to Viaplay Group's Business Integrity Screening (BIS) process, which ensures legal compliance, accurate recordkeeping, and ethical partner selection. For guidance on what constitutes a significant third-party relationship, refer to the BIS Guidelines on the Group Compliance intranet.

Human rights considerations are also embedded in our ESG due diligence for mergers and acquisitions, including market screening. To reinforce responsible practices in our productions and hardware supply chain, we operate a third-party sustainability audit programme.

Viaplay Group also encourages all individuals working at all levels of its organisation to report, without fear of retaliation, any suspected misconduct and any circumstances that

may give rise to a heightened risk of slavery or human trafficking through our whistleblowing channels, available on Viaplay Group's intranet and website, governed by our Group Whistle-blower Directive. We report on any human rights violations and discrimination incidents in our Annual and Sustainability Reports.

4. Roles and Responsibilities

Viaplay Group's Board of Directors has overall responsibility for the Group's Human Rights Policy. The Head of Sustainability is the owner of this Group Policy and is responsible for its content. They are also responsible for maintaining and updating this Group Policy, and for ensuring that it is properly published and enforced.

Members of the Group Executive team are responsible for communicating and implementing this Group Policy, and for ensuring that all employees within their areas of responsibility are familiar with and follow this Group Policy. All Viaplay Group employees are individually responsible for reading, understanding and following this Group Policy when applicable. Each employee is encouraged to raise any concerns about actual or possible violations of this Policy to Group Sustainability (sustainability@viaplaygroup.com), Group Compliance (compliance@viaplaygroup.com) or through the whistleblower channels available on Viaplay Group's intranet and website.

5. References

- Code of Conduct
- Third Party Code of Conduct
- Group Sustainability Policy
- Group Equality & Diversity Directive
- Group Non-discrimination & Anti-harassment Directive
- Group Whistle-blower Directive

6. Document History and Change Information

For details of this Group Policy's document history and change information, see Appendix 1.

Appendix 1 - Document History and Change Information

Version	Revision Date	Change Information
0	2022-09-22	Group Human Rights Statement upgraded to Group Policy
1	2022-09-22	Initial Group Policy
2	2023-09-23	(3.2 Due Diligence) Revised to include we are committed to mitigating and remedying any breaches to standards that occur.
3	2024-09-26	Process change: Para. 3.2 (Due Diligence) includes new Business Integrity Screening (BIS) procedure for significant third-party relationships.
4	2025-09-30	Structure of Para. 3.2 updated; name of Para 3.2 changed to Sustainability Due Diligence.
5	2026-09-25	Minor edits; inclusion of hardware considerations and Para 3.2 (Salient Human Rights Risks).