

Supplier and Business Partner Code of Conduct



viaplay
GROUP

VIAPLAY GROUP CONDUCTS EVERY ASPECT
OF OUR BUSINESS WITH HONESTY, INTEGRITY AND OPENNESS

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: Bold, Engaging, Smart and Curious. 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 Rights.

1. Complying with applicable laws

We are committed to conducting our business in full compliance with all applicable laws and regulations. We expect the same commitment from our Suppliers and Business Partners. Stricter rules than those described in this Code may be in place in certain countries or business areas. Where multiple rules address the same subject, and do not conflict with each other, the highest standard shall be applied.

2. Committing to our people and our world

We expect our Suppliers and Business Partners to respect internationally recognised principles relating to human and labour rights, and to conduct business in ways that protect the environment.

2.1 Human rights

As defined in the UN Guiding Principles on Business and Human Rights, the supplier/Business Partner has a responsibility to respect human rights and shall, therefore, have a policy and due diligence processes in place to identify, prevent, mitigate and account for how the supplier addresses adverse human rights impacts it may cause, contribute to or be linked with. Acting upon human rights impacts includes taking appropriate steps to avoid, minimize and/or mitigate them.

2.2 Diversity, equality, and non-discrimination

Suppliers and Business Partners shall recognise and be committed to upholding the human rights of workers, and treat them with the dignity and respect indicated by internationally recognised principles. Suppliers shall have fair hiring and employment practices to ensure there is no discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status. In addition, workers or potential workers shall not be subjected to any medical tests that could be used in a discriminatory way. There is to be no harsh or inhumane treatment, including sexual harassment or abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, nor is any such treatment to be threatened.

Viaplay Group respects and supports children's rights, and expects all Suppliers and Business Partners to do the same. Suppliers and Business Partners must have a good understanding of child protection and must have in place working practices that protect the welfare of children.

Working weeks are not to exceed the maximum hours set by local law. Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime and legally mandated benefits, as per local laws and regulations.

Any disciplinary wage deductions are to conform to local law.

Suppliers and Business Partners are to respect the right of workers to associate fairly and to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment. Workers' rights to join labour unions, seek representation and join workers' councils in accordance with local laws shall be acknowledged.

Suppliers and Business Partners shall not penalise workers for lawful participation in labour organisation activities.

2.4 Health and safety

Suppliers and Business Partners shall ensure that workers are provided with a healthy and safe working environment in accordance with internationally recognised standards.

Suppliers and Business Partners shall do their utmost to control hazards and take necessary precautionary measures against accidents and occupational risks. Suppliers shall ensure that workers receive adequate and regular health and safety training and education.

Suppliers and Business Partners must have clear procedures in place to ensure that emergency situations are dealt with in a way that minimises harm to life, environment, and property.

2.3 Environment

Suppliers and Business Partners shall conduct business in ways that protect and preserve the environment. Viaplay Group encourages Suppliers and Business Partners to take a precautionary approach towards environmental challenges, and to undertake initiatives to promote greater environmental responsibility and the development of environmentally friendly technologies and processes.

Viaplay Group particularly encourages Suppliers and Business Partners to work towards the continuous improvement of their environmental performance related to greenhouse gas emissions, energy consumption, pollution prevention, waste management, and resource efficiency. Additionally, Viaplay Group encourages suppliers to work to understand and mitigate impacts on biodiversity.

Suppliers shall address their climate impact in a structured manner, aligned with the following requirements: Supplier shall make a public commitment to reduce GHG emissions in line with 1,5-degree scenario ambition level as defined by the Science-based targets initiative. Supplier shall set time bound targets for relevant Scope 1, 2 and 3 emissions (GHG Protocol Corporate Standard) and have them verified by the Science Based Targets initiative or similar by 2026.

2.5 Working conditions

Forced, bonded or indentured labour, human trafficking or involuntary prison labour is not to be used and employees and workers of Suppliers and Business Partners shall be free to leave their employment subject to contractual and legal terms. All work shall be voluntary, and workers shall be free to leave upon agreed or reasonable notice.

Child labour is not tolerated. The term "child" refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education or the minimum age for employment in the country. Workers under the age of 18 shall not perform hazardous work and may be restricted from night work out of consideration for their educational needs. The use of legitimate workplace apprenticeship programmes and internships that comply with all applicable laws and regulations is supported.

3. Protecting data and information

We expect our Suppliers and Business Partners to respect the right to privacy, and to handle personal data and confidential information responsibly.

3.1. Privacy and confidential information

Suppliers and Business Partners shall respect every individual's right to privacy.

This includes complying with all applicable data protection laws and regulations when personal data and information are collected, stored, or otherwise processed or transferred.

We also expect our Suppliers and Business Partners to protect confidential information from unauthorised disclosure or misuse.

3.2. Insider information

Viaplay Group's Suppliers and Business Partners must ensure that any inside information or non-public information obtained as a consequence of a relationship with Viaplay Group is not disclosed or used for the business or personal benefit of the Supplier and Business partner, their employees, or other persons.

3.3. Intellectual property

Suppliers and Business partners shall safeguard Viaplay Group's and third parties' confidential information and intellectual property (including copyrights, trademarks and domain names and patents) from unauthorised access and misuse, and only make proper use of information or assets that Viaplay Group shares with them. Viaplay Group's intellectual property shall only be used by a Supplier or Business partner as expressly authorised by Viaplay Group.

3.4. Financial information

Viaplay Group's financial transactions are handled with clearly defined and designated roles, responsibilities and authorisations, and accurate and complete recordkeeping of our business transactions is essential to the successful operation of our business. We are committed to transparency and to reporting financial information timely, accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with legislation and regulatory requirements. Suppliers and Business Partners shall ensure that they and/or any associated persons, do not engage in any form of financial irregularities in relation to Viaplay Group's business.

4. Fair business practices

We expect our Suppliers and Business Partners to never compromise on ethics when doing business.

4.1 Bribery and corruption

Suppliers and Business Partners shall ensure that they, or any associated persons, do not engage in any form of bribery or corruption in relation to Viaplay Group's business.

Suppliers and Business Partners shall not, either directly or indirectly, offer gifts to Viaplay Group employees or representatives, or to anyone closely related to these parties. Hospitality, such as social events, meals or entertainment, may be offered in order to develop business relationships. However, this hospitality must be reasonable and proportionate to the circumstances, and the cost should be kept within appropriate limits.

Viaplay Group encourages all Suppliers and Business Partners to implement and maintain an anti-corruption programme aligned with internationally recognised standards. This program shall be transparent, include adequate training and information, and be efficiently maintained.

4.2. Conflicts of interest

Viaplay Group avoids and eliminates conflicts of interest. We expect our Suppliers and Business Partners to inform us immediately if a situation arises which appears to involve a conflict of interest affecting Viaplay Group.

4.3. Tax

Suppliers and Business Partners shall conduct their business in full compliance with applicable tax and accounting laws and regulations. Viaplay Group does not tolerate engagement in the performance of, or facilitation of tax evasion, or in committing tax fraud and expects its Suppliers and Business Partners to do the same. Suppliers and Business Partners shall ensure that they, and/or any associated persons, do not engage in any form of tax evasion or tax fraud in relation to Viaplay Group's business.

4.4. Fair competition

Viaplay Group believes in vigorous and fair competition, and supports the development of appropriate competition laws. We expect our Suppliers and Business Partners to commit to the same. Suppliers and Business Partners shall not enter into any agreements (written or oral), or engage in other forms of activities, which prevent or restrict competition and breach applicable competition laws.

4.5. Interacting with policy makers and public officials

Viaplay Group is avoiding conflicts of interest and is following the practices on fair competition and anti-bribery and corruption in relation to any contacts and cooperation with Government officials, civil servants, trade associations as well as in regards to other lobbying activities. Suppliers and Business Partners shall ensure that they and/or any associated persons follow the same practices in relation to Viaplay Group's business.

4.6. International business and sanctions

Viaplay Group complies with international sanctions that may be imposed on countries, entities or individuals, either multilaterally or unilaterally. We are also committed to compliance with anti-money laundering rules and regulations throughout the world. We expect our Suppliers and Business Partners to do the same.

Asking questions and reporting concerns

Viaplay Group encourages our Suppliers and Business Partners to ask questions regarding any matter related to this Code, and their employees to report any ethical concerns in relation to the work relationship with Viaplay Group, including suspected or witnessed cases of non-compliance with this Code or applicable laws and regulations using our whistle-blowing channels communicated on Viaplay Group's website.

Suppliers and Business Partners can reach out to their Viaplay Group contact or Viaplay Group's Head of Group Compliance (compliance@viaplaygroup.com) at any time.