



Third Party Code of Conduct

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Who we are

Viaplay Group conducts every aspect of our business with honesty, integrity and openness.

We are a company that prioritises people – from our hundreds 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 safeguarding 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. At Viaplay Group, responsibility drives our values and defines our 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.

This Third Party Code of Conduct applies to all third parties of Viaplay Group (Third Party or Third Parties). A Third Party is defined as any person or entity, inclusive of its personnel, that: (i) contracts with Viaplay Group to provide goods or services to Viaplay Group; (ii) contracts with Viaplay Group to provide services to Viaplay Group's end-users; or (iii) has entered a business relationship with Viaplay Group to establish a partnership.

Complying with this Code and applicable laws

We are committed to conducting our business in full compliance with all applicable laws and regulations. We expect the same commitment from Third Parties.

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.

Viaplay Group expects Third Parties to implement policies, procedures and training, as deemed necessary by the Third Party, to comply with this Code. Viaplay Group may also conduct periodic compliance assessments to ensure Third Parties are compliant with the Code.

Where appropriate, Viaplay Group conducts risk-based due diligence on Third Parties as part of assessing its relationship with Third Parties. Viaplay Group expects Third Parties to provide complete and accurate information to facilitate due diligence efforts undertaken by Viaplay Group, where requested. If Viaplay Group determines that a Third Party has breached this Code, it may require the Third Party to implement a remediation plan, or, in certain circumstances, it may suspend or terminate the relationship with the Third Party.

Committing to our people and our world

We expect Third Parties to respect internationally recognised principles relating to human and labour rights, and to conduct business in ways that protect the environment.

Human rights

As defined in the UN Guiding Principles on Business and Human Rights, Third Parties have a responsibility to respect human rights. and shall, therefore, maintain a policy to account for how third parties address adverse human rights impacts they may cause, contribute to or be linked with.

Acting upon human rights impacts includes taking appropriate steps to avoid, minimise and/or mitigate them. Third Parties shall establish and maintain a human rights due diligence process appropriate to their size and circumstances to identify, prevent, and mitigate any violation of rights protected by international human rights instruments.

Diversity, equality, and non-discrimination

Third Parties 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. Third Parties 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, marital status or any other protected category. Furthermore, workers and job applicants must not be subjected to medical testing that may lead to discrimination. Any form of harsh or inhumane treatment, including sexual harassment, corporal punishment, coercion, or verbal abuse is strictly prohibited, as are threats of such conduct.

Viaplay Group respects and supports children's rights and requires all Third Parties to do the same, ensuring appropriate child protection measures are in place.

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.

Third Parties shall 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.

Third Parties shall not penalise workers for lawful participation in labour organisation activities.

Health and safety

Third Parties shall ensure that workers are provided with a healthy and safe working environment in accordance with internationally recognised standards.

Third Parties shall take all reasonable measures to manage hazards and prevent accidents and occupational risks. Suppliers shall ensure that workers receive adequate and regular health and safety training and education.

Third Parties must have clear procedures to effectively manage emergencies and minimise harm to life, the environment, and property.

Environment

Third Parties shall conduct business in ways that protect and preserve the environment. Viaplay Group encourages Third Parties 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 Third Parties 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 Third Parties to work to understand and mitigate impacts on biodiversity.

Viaplay Group has made a public commitment to reducing GHG emissions in line with 1,5-degree scenario ambition level as defined by the Science-based targets initiative. Third Parties are expected to adopt similar science-based climate targets within two years of entering a business relationship with Viaplay Group, if they have not already, and demonstrate progress toward achieving them through annual disclosures. The Science-based target initiative has target setting pathways appropriate for the size and circumstances of most companies.

Working conditions

Forced, bonded or indentured labour, human trafficking or involuntary prison labour shall not be used. Employees and workers of Third Parties 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 strictly prohibited. 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 shall 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.

Protecting data and information

We expect Third Parties to respect the right to privacy, and to handle personal data and confidential information responsibly and lawfully.

Privacy and confidential information

Third Parties 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.

If the Third Party uses subcontractors or sub-processors that handle Viaplay Group data, the Third Party is responsible for ensuring that these entities also meet the same data protection and confidentiality standards.

We also expect Third Parties to protect personal data and confidential information against unauthorised and unlawful use, disclosure, access, loss, alteration, damage and destruction.

Insider information

Viaplay Group's Third Parties 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 Third Party, their employees, or other persons.

Intellectual property

Third Parties shall safeguard Viaplay Group's and other 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 Third Party as expressly authorised by Viaplay Group.

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. Third Parties 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.

Fair business practices

We expect Third Parties to never compromise on ethics when doing business.

Bribery and corruption

We expect Third Parties to uphold the highest ethical standards and to strictly prohibit any form of bribery or corruption in connection with Viaplay Group's business. This applies to all associated individuals and entities.

Third Parties must not offer, directly or indirectly, any form of gift or incentive to Viaplay Group employees, their representatives, or close associates. While modest hospitality—such as meals, social events, or entertainment—may be appropriate to support legitimate business relationships, it must always be reasonable, proportionate, and kept within acceptable cost limits.

Viaplay Group also encourages Third Parties to establish and maintain a transparent anti-corruption programme, aligned with internationally recognised standards. This should include clear policies, ongoing training, and robust internal controls to prevent misconduct.

Conflicts of interest

Viaplay Group avoids and eliminates conflicts of interest. We expect full transparency regarding any actual or potential conflicts of interest. Third

Parties must promptly disclose any situation that may improperly influence their decision-making or impact their objectivity in relation to Viaplay Group.

Tax

Third Parties 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 Third Parties to do the same. Third Parties 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.

Fair competition

Viaplay Group believes in vigorous and fair competition and supports the development of appropriate competition laws. We expect Third Parties to commit to the same. Third Parties 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.

Interacting with policy makers and public officials

Viaplay Group is committed to conducting all interactions with public officials, civil servants, trade associations, and other stakeholders with integrity, transparency, and in line with fair competition and anti-bribery regulations. We expect Third Parties to adopt the same ethical approach in all such engagements related to Viaplay Group's business, including any lobbying or advocacy activities. Third Parties shall take particular care to avoid situations that could create conflicts of interest or undermine public trust.

International business and sanctions

Viaplay Group adheres strictly to international sanctions imposed on countries, entities, or individuals—whether mandated by multilateral bodies or individual nations. In line with this, Third Parties shall also ensure full compliance with all applicable sanctions regimes and anti-money laundering laws. This includes conducting appropriate due diligence, maintaining transparent records, and avoiding any transactions or relationships that could expose Viaplay Group to legal or reputational risk.

Reporting violations

We expect Third Parties to speak up and raise concerns responsibly.

Viaplay Group encourages Third Parties 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 whistleblowing channels communicated on Viaplay Group's website (viaplaygroup.com). Concerns may be reported anonymously.

We expect that Third Parties will not retaliate against anyone who makes a good faith report of a violation of Viaplay Group's Third Party Code of Conduct, policies, or the law, either to the Third Party or to Viaplay Group. Acting in good faith means that the report is made sincerely and honestly.

Third Parties can reach out to their Viaplay Group contact or Viaplay Group's Compliance Department via email at compliance@viaplaygroup.com at any time.



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Please see www.viaplaygroup.com/en/about/corporate-governance/rules-business-conduct for the latest version of this Code.