



Non-Discrimination & Anti-Harassment Directive

Document owner	SVP People & Culture
Approval	CEO / CFO
Initially adopted	25 February 2020
Date last approved	2023-11-23
Date of next review/approval	Q3 2024
Applicability	Group

1. Purpose and scope

Viaplay Group is committed to maintaining a work environment that is free from discrimination and harassment. We value diversity and inclusion and believe that everyone deserves to be treated with respect and dignity. We believe that an inclusive work environment with diverse teams deliver success to the business and costumers.

1.1 Target Group

Equality & Diversity is not just a matter for the company's leaders, these guidelines apply to all employees, (whether permanent, fixed-term or temporary), consultants, contractors, seconded staff, casual workers and agency staff, volunteers, interns, or any other person associated with us, or any Viaplay Group subsidiaries or their employees, wherever located (collectively referred to as employees) and should be used alongside other Viaplay Group policies, guidance, local legislation and Code of Conduct and Supplier Code of Conduct.

It covers Viaplay Group's premises and in professional contexts outside these premises, such as business trips or work-related social functions. The ultimate responsibility for upholding the policy lies with the company's CEO.

These guidelines apply in all countries and will prevail, subject to local law. It is the responsibility of every employee to implement and promote these principles in their day-to-day dealings with everyone. Failure to comply with these guidelines may lead to disciplinary action.

2. Definitions

2.1 Protected characteristics

We oppose any form of discrimination directed at anyone including but not limited to; employees, contractors, suppliers, customers, or job applicants on any of the so called "protected characteristics":

- Age
- Disability
- Gender, re-assignment of gender, or sexual orientation
- Marital/civil partnership status
- Pregnancy/Maternity/Parental Responsibility
- Race, ethnic or national origin (including colour)
- Religion or belief
- Trade union membership (or lack of it)

- Association with any of the above
- Physical Conditions
- Any other protected status under applicable laws

2.2 Forms of discrimination

Direct discrimination: is when a person is disadvantaged by being treated less favourably than another person in a comparable situation. The disadvantaging must be related to one of the seven grounds of discrimination. For example, rejecting an applicant on the grounds of their race or gender is direct discrimination.

Indirect discrimination: Indirect discrimination is when there is a rule or a procedure that appears to be neutral but in fact disadvantages people. For example, if an organisation has policies or procedures that seems to be neutral but in fact disadvantages people who share one or more of the protected characteristics. The rule may then be discriminatory, even if the same rule applies to everyone. Examples may be a certain height requirement that could disadvantage women, or a requirement for a driving license which could disadvantage people with disabilities.

Inadequate accessibility: is when a person with a disability is disadvantaged through a failure to take reasonable accessibility measures that would put that person in a comparable situation with others without the disability.

Harassment: In general terms, harassment is defined as unwanted conduct that affects a person's dignity in the workplace or that creates an intimidating, hostile, degrading, humiliating, or offensive working environment. Harassment can take place in many different forms. It may be physical, verbal or non-verbal.

It can be expressed in meetings, via telephone, emails, social media or other means of communication, including jokes or gestures. Actions or comments that one person considers harmless may not be seen in the same light by the recipient. It is always the recipient who decides what is acceptable or not.

Sexual harassment: is a broad term, including many types of unwelcomed verbal and physical sexual attention as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. The act can be of both verbal and physical nature and can take place regardless of the gender, gender identity or gender expression of the individuals involved. It can, for example, occur between same-sex individuals as well as between opposite-sex individuals. In addition, sexual harassment must not necessarily be motivated by sexual desire.

An instruction to discriminate: is when someone gives an order or instructs someone who is in some way dependent, such as an employee, to discriminate against another

person. An instruction to discriminate may also be given to a person or a company that has undertaken a commission, such as a staffing agency.

Victimisation: is when someone is treated less favourable on the grounds of having brought information forward about discrimination or harassment or supported someone else's complaint.

3. How we prevent discrimination & harassment at Viaplay Group

We have zero tolerance for any type of discrimination and harassment.

Everyone at Viaplay Group, regardless of role, has a personal responsibility to treat everyone they meet at work with respect. Everyone is expected to help to prevent discrimination and harassment in the workplace by thinking about their choice of words and conduct, challenging unacceptable conduct and language by others, and supporting anyone who experiences any type of discrimination and harassment.

3.1 Reporting procedure

Viaplay Group encourages everyone to raise any concerns about any type of discrimination at the earliest possible stage. Where possible and if appropriate, the behaviour may be resolved informally by first making the person aware that their behaviour is unacceptable and asking that person to stop the behaviour.

There are different channels to formally report a concern. Either via your line manager, your manager's manager or contact Viaplay Group's People & Culture team.

We also recognise that there may be circumstances when you are not comfortable reporting a concern openly. Therefore, you can also report a concern anonymously by using ["report an issue"](#) in Jira.

3.2 Investigation process

All complaints of discrimination will be systematically investigated. All matters are handled fairly, confidentially and professionally. Appropriate corrective action will be taken if it is determined that a violation of this policy has occurred. Certain prohibited behaviours could result in disciplinary action up to and including termination of employment following the applicable labour law.

3.3 Retaliation prohibition/victimisation

We strictly prohibit retaliation against any employee who reports discrimination or harassment, participates in an investigation, or opposes discriminatory practices. Retaliation is a serious violation of this policy and will result in disciplinary action, up to and including termination of employment.

4. Confidentiality

Viaplay Group handles all concerns fully confidential. Any breach of confidentiality may give rise to disciplinary action.

6. Document history and change information

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

Appendix 1 - Document History and Change Information

Version	Revision Date	Change information
---------	---------------	--------------------

1	2020-02-25	Initial Group Policy.
2	2021-06-07	Separated Non-Discrimination & Anti-Harassment Directive from the EDI Directive.
3	2022-01-11	No changes.
4	2023-08-24	Have added examples of harassment and offensive special treatment.
5	2023-11-23	<p>Significant changes to the document. Changes:</p> <ol style="list-style-type: none"> 1. Clarified the purpose and added target group to fit the structure. 2. Reworked the document-order to provide coherence. 3. Included discrimination definitions. 4. Clarified and updated the reporting procedures. 5. Added investigation process and retaliation prohibition/victimisation.