



# Modern Slavery Act Statement

Document owner

Approval

Date last approved

Date of next review/approval

Applicability

Head of Sustainability

Board of Directors

24 April 2020

Q1 2021

Group

# Modern Slavery Act Statement

## 1. Background

This statement is made by Nordic Entertainment Group AB ("NENT Group") pursuant to the requirements of Section 54 of the Modern Slavery Act 2015. The statement outlines the activities undertaken by NENT Group to identify and mitigate the potential risk of modern slavery related to its business operations and supply chain during the financial year ending December 2019.

This statement was approved on 24<sup>th</sup> of April 2020 by NENT Group's Board of Directors.

## 2. Business, structure and supply chain

NENT Group is the Nordic region's leading entertainment provider. The company entertains millions of people every day with its streaming services, TV channels and radio stations, and its production companies create content that is experienced around the world. NENT Group makes life more entertaining by telling stories, touching lives and expanding worlds – from live sports, movies and series to music and original shows. Headquartered in Stockholm, NENT Group is listed on Nasdaq Stockholm ("NENT A" and "NENT B")

The majority of NENT Group's activities are in the Nordic region, although it operates production companies in other European countries and in the US and sells content to customers worldwide. The company's subsidiary in the United Kingdom, Nordic Entertainment Group UK Ltd, holds Ofcom licenses for broadcasting TV content. Its UK subsidiary DRG is part of the group's studio business. As a media entertainment provider, NENT Group's supply chain mainly consists of suppliers of content, set-top boxes, satellite and fibre capacity, IT hardware and services. Read more about NENT Group at: [www.nentgroup.com](http://www.nentgroup.com)

## 3. Relevant policies

As a responsible global business, NENT Group is committed to acting in accordance with international initiatives and standards such as the Fundamental Conventions of the International Labour Organisation, the UN Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights. In 2019, NENT Group became a signatory of the UN Global Compact and committed to the Sustainable Development Goals Media Compact and the Women's Empowerment Principles. The following NENT Group policies describe the company's approach to slavery and human trafficking:

**Code of Conduct:** NENT Group's Code of Conduct forms the backbone of NENT Group's work with human rights and labour rights. The Code sets out the standards with which all NENT Group employees are expected to comply. It

emphasises the company's commitment to providing a professional environment with fair working conditions in line with universal human and labour rights standards, applicable laws, and agreements on working hours and compensation. Everyone at NENT Group is free to join associations or unions, and to bargain collectively or individually. The Code expressly states that child labour, or forced labour at any age, is not tolerated at NENT Group. The Code of Conduct can be found [here](#).

**Supplier Code of Conduct:** NENT Group is committed to ensuring that its suppliers adhere to the highest ethical standards. NENT Group's Supplier Code of Conduct sets out the standards with which all NENT Group's suppliers are expected to comply. The Code is included in NENT Group's contracts with new suppliers. Under the Supplier Code of Conduct, suppliers are required to provide fair working conditions that are free from discrimination and inhumane treatment. The Supplier Code of Conduct also expressly prohibits modern slavery, forced or child labour, or other forms of exploitation. Under the Supplier Code of Conduct all NENT Group's suppliers are expected to impose the same standards on their own suppliers. The Supplier Code of Conduct can be found [here](#).

NENT Group's Code of Conduct and Supplier Code of Conduct are reviewed and updated regularly to reflect changes in the company's operations and its legal and regulatory environment. Both Codes have been reviewed and updated in Q1 2020.

**HR policies and procedures:** NENT Group's People Policy sets out the core elements of the company's people strategy, including working conditions. The company has zero tolerance for any form of discrimination or harassment which is reflected in the Group's Equality and Diversity Directive. This directive emphasises that everyone at NENT Group should be treated with respect and dignity and should not be victimised or subject to harassment. NENT Group's People & Culture function reviews the company's policies and directives annually and strives to ensure that the working conditions of employees and subcontractors in every part of NENT Group's businesses are compliant with all applicable employment and human rights laws. Every NENT Group business area has a dedicated People & Culture team who provide continuous support and guidance on all HR policies.

**Whistleblower Directive:** NENT Group encourages all individuals working at all levels of its organisation to report any conduct they believe to be a violation of NENT Group's Code of Conduct, Group policies/directives, or applicable laws and regulations. This includes any circumstances that may give rise to a heightened risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for employees to report concerns without fear of retaliation. NENT Group employees can report a concern either through their normal reporting lines (to line managers or HR representatives) or to one of NENT Group's Whistleblower Officers. They can also report a concern anonymously by using the Speak-Up Line, which is operated by an independent third party.

## 4. Risk assessment and due diligence processes

As noted above, NENT Group's Supplier Code of Conduct is being included in contracts with new suppliers (including their employees, consultants and sub-contractors). Violations of the Supplier Code of Conduct will lead to NENT Group reviewing and potentially ending the business relationship. At the same time, the Supplier Code of Conduct encourages suppliers to report any ethical concerns or suspected cases of non-compliance with the Code.

In 2019, NENT Group continued to develop its mapping and risk analysis process for its supply chain and established the Responsible Sourcing Program, which is managed by representatives from NENT Group's Compliance Office and Sustainability team, amongst others.

The Responsible Sourcing Program is an ongoing process with an initial focus on direct suppliers. Based on factors such as location in high-risk countries, scale of NENT Group's engagement with the supplier, product material sourcing and internal risk assessment, all identified material/high-risk suppliers will be asked to complete a Self-Assessment Questionnaire. Based on the input received from the Self-Assessment Questionnaire, NENT Group will decide whether further actions are required to secure compliance with its ethical standards, such as requests for additional information or performance of on-site audits.

Suppliers with identified non-compliance issues may receive corrective action plans with time frames for follow up, depending on the severity of the issue. As stated in NENT Group's Supplier Code of Conduct, failure to comply with NENT Group's standards and the provisions set out in the Code may result in NENT Group ending its business relationship with the supplier in question.

## 5. Training

NENT Group requires all employees to complete an internal training program that includes a Code of Conduct e-learning. Amongst other areas, this training addresses risks related to sustainability. NENT Group plans to develop this training program further and to increase awareness of sustainability-related risks, especially for personnel with responsibility for supply chain management or human resources.

Stockholm, 2020-05-08



Anders Jensen  
President and CEO, NENT Group AB