

Code of Conduct



viaplay
GROUP

1. Who are we?

This is a vital question for every organisation in today's fast moving world. And Viaplay Group's answer is clear – we are the Nordic region's leading entertainment provider. Our objective is to be the leading Nordic streaming service provider and content producer with a global appeal. We entertain millions of people every day with our streaming services, TV channels and radio stations, and our production companies create exciting content for media companies around the world. Our purpose is to tell stories, touch lives and expand worlds.

We constantly innovate and challenge. At the same time, we always seek to act in a fair and honest way towards each other and all our stakeholders. We embrace diversity, promote equality and take care of our environment. At a time when so much in our industry is changing, our commitment to doing things right remains the same.

This Code of Conduct sets out what we expect from each other. It applies to all Viaplay Group employees, including employees of entities in which Viaplay Group exercises decisive control, and board members. It also applies to temporary workers, including freelancers and consultants. Your manager will let you know if additional policies and guidelines apply to your specific role and responsibilities.

If you have any questions concerning this Code of Conduct – or if you are ever uncertain how to act – please contact your line manager, local People & Culture team, Viaplay Group's Head of Compliance or Viaplay Group's Sustainability team.

Please read, understand and follow this Code – and always speak up if you have any concerns. This is what we stand for. This is who we are.

Thank you.

Anders Jensen

PRESIDENT & CEO



2. What we stand for

We prioritise people

Our values are Bravery, Equality, Appreciation and Trust

Our aim is to be an employer, provider and partner of choice

WE ARE THE HEARTBEAT OF ENTERTAINMENT

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 clear values: Bravery, Equality, Appreciation and Trust. 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 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 Labor Organization, the UN Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights. We are a signatory of the UN Global Compact.

Each of us is responsible for being familiar with this Code. We are responsible for seeking guidance when we need advice regarding its principles, when we want to raise concerns, or when we are unsure whether certain conduct is acceptable.

For further information and contact details, see Raising concerns (p.7) and Ethics checklist and contact information (p.8) in this Code.

3. Committing to our people and our world

Everyone at Viaplay Group expects and gets equal opportunities

We understand, respect and value each other's differences

We are committed to each other and to the environment we share

Equality, diversity and inclusion.

We embrace equality, diversity and inclusion. When it comes to recruitment, promotion and training, what counts is competence, experience, attitude, ambition and performance. We believe that successful teams are diverse teams. We understand, respect and value each other's differences. We do not tolerate discrimination, bullying, victimisation or any kind of harassment.

Fair working conditions.

We provide a professional environment in line with universal human and labour rights standards, applicable laws, and agreements on working hours and compensation. Everyone at Viaplay Group is free to join associations or unions, and to bargain collectively or individually. Child labour, or forced labour at any age, is not tolerated in our business or supply chain; everyone at our company has completed compulsory education before joining.

Health and safety.

Viaplay Group provides a safe working environment that promotes physical and psycho-social well-being. Our offices and

facilities comply with all applicable health and safety regulations.

When our employees travel for business, we want them to be supported and safe at all times. We have therefore implemented programs that aim to keep our people informed and secure, both when travelling for business or working remotely. Everyone should enjoy their job and have a healthy work-life balance, so we discourage work outside office hours.

Protecting our environment.

Our planet is our home. We nurture and safeguard the environment by keeping track of our carbon footprint, mapping our energy consumption, and recycling waste and reusing equipment wherever possible. Responsible travel is a key element in Viaplay Group's environmental care efforts. As a result, we recommend choosing eco-friendlier travel alternatives, such as video conferencing and taking the train instead of flying wherever possible.

If you have questions or concerns, contact your line manager, local People & Culture team, or Viaplay Group's Sustainability team.

4. Protecting our assets

Every asset must be kept safe

When something is not public, we keep it private

We use work assets for work

Protecting our assets safeguards our business.

The content we show on our platform is one of Viaplay Group's most obvious assets. But we have even more assets like our software, our computer systems and the information stored on our devices (including desktops, laptops, phones, etc). Our intellectual property, strategic plans and customer data are assets too and so are the Viaplay Group name and our logos. Every asset enables the success and sustainability of our business in some way. This means that we are all responsible for protecting and using them correctly.

Our IT assets.

We should only use Viaplay Group's company email, intranet and internet connectivity and devices for authorised business purposes. A reasonable amount of private usage is allowed – provided it does not negatively affect your work or contradict this Code of Conduct. That means, we do not access, display, download or share inappropriate content or information when using our IT environment. This applies to material that is illegal, offensive, harassing, racially or sexually discriminatory in nature, or otherwise inconsistent with a professional and ethical environment. We are careful when opening attachments or links in emails or on sites that are not related to our business, or from any source that we do not recognise.

Using personal software on a work computer, or modifying our software, is a security risk and requires the approval of the IT department.

Confidential information.

As part of our work, we may have access to information about Viaplay Group that is not available to other people within or outside the organisation. This can include financial data, business plans, contracts, and customer or supplier details. If the information is not public, it must be treated as restricted, confidential or secret depending on its sensitivity. We protect confidential information from improper use and do not share it – even with colleagues – unless authorised to do so.

If we leave Viaplay Group.

Leaving Viaplay Group requires you to return all your work-related equipment and assets. That includes for example your computer, phone and any copies of files you may have accumulated during your time working here. It's important to remember that confidential information stays confidential, even after you leave the company.

If you have questions or concerns, contact your line manager, or Viaplay Group's Head of Information Security or Head of IT.

5.1 Doing business the right way

We act with honesty and integrity

We do not give or accept bribes

We avoid conflicts of interest

WE NEVER COMPROMISE ON ETHICS WHEN DOING BUSINESS

Responsible content.

We have an opportunity to use the power of storytelling to create positive impacts for people, society and the environment. We embrace principles such as freedom of expression, privacy, editorial independence and universal service accessibility. We promote plurality, diversity and inclusivity – our content reflects a wide range of perspectives and challenges stereotypes. We protect younger viewers through careful scheduling and tools such as PIN locks that help keep children safe from unsuitable material. We follow applicable laws regarding illegal and unsuitable content.

Anti-bribery and corruption.

A bribe is not just cash in an envelope. It can be the provision of anything of value – including cash or equivalents, gifts, paid expenses, entertainment, kick-backs, favours or loans – in return for certain actions. We do not tolerate any form of bribery, corruption or inducement to act improperly. Everyone working for – and on behalf of – Viaplay Group is expressly prohibited from giving, offering or promising

anything of value to influence business decisions or to gain an improper business advantage. The same goes for requesting, accepting or receiving a bribe. Nobody at Viaplay Group will ever face punishment of any kind for refusing to pay a bribe or for highlighting corruption – we expect honesty and integrity from each other and from our partners.

Conflicts of interest.

We avoid and eliminate conflicts of interest. Common types of conflicts of interest include maintaining external directorships or significant shareholdings in suppliers, customers or competitors; employing family members or friends; or using a supplier in which a relative or close friend has a significant role or financial interest. To clear a conflict of interest, or to confirm whether a conflict exists, speak to your line manager or seek advice from Viaplay Group's legal counsels or Head of Compliance.

5.2 Doing business the right way

We compete vigorously but fairly

We act with honesty and integrity

We work with partners who share our standards

Fair competition.

We compete vigorously but fairly. We are committed to free and open competition, and we abide by relevant competition laws wherever we do business. We expect the same high standards from each other. We never agree with a competitor to limit how we compete with one another. That means: no price fixing; no agreements to split markets or customers; and no bid-rigging arrangements with our competitors. Competition laws also prohibit the abuse of dominant market positions.

Doing business internationally.

Most countries have adopted laws regulating international business activities. Some of these laws prohibit business dealings with specific sanctioned countries, companies or individuals. The rules may restrict transfer of assets, monetary payment or provision of services to these sanctioned countries or parties. To avoid breaching these rules, as well as to steer clear of other illegal practices such as money laundering, we must make sure that we know our business partners – including who owns or controls them, what business they do and where, and their reputation.

Representing Viaplay Group.

Wherever we are in the world, we always behave as ambassadors for Viaplay Group, and we respect local cultures at all times.

Interacting with partners and suppliers.

We respect human rights and the interests of Viaplay Group's employees and third parties – and we only work with partners and suppliers who do the same. We ensure that current or prospective partners and suppliers are aware of – and act in accordance with – our Supplier Code of Conduct.

If you have questions or concerns, contact your line manager, or Viaplay Group's Head of Compliance or Sustainability team.

6. Handling information the right way

We work responsibly when handling personal data

We keep inside information in-house

We let our communication team take the lead on communication

Data protection.

Everybody has a fundamental right to privacy, and we respect this right at all times. We protect all personal data entrusted to us, and we comply with all data protection laws and regulations wherever we operate. The definition of personal data is very wide and can include name, address, phone number, date of birth, social security number, bank account information, IP address and device ID. We hold and process personal data about our employees and customers for administrative and commercial purposes. We make sure that we only collect, access or process personal data that we need to conduct our business, and only for the purpose for which it is intended. We also ensure the data is always kept secure.

Business information and communication.

As a publicly listed company, we have an obligation to provide business information to our stakeholders on a regular basis. Our public communication and disclosure are always full, fair, timely and accurate. Our records form the basis of Viaplay Group's public disclosure and are also used in our internal decision-making processes. To ensure that our financial statements accurately reflect Viaplay

Group's asset base and transactions, we are responsible for ensuring that all information that we submit to company records is complete and accurate. If asked (online or offline, in or out of the office) about Viaplay Group's views or statements by any external party, we pass the request on to Viaplay Group's Corporate Communications team. This team is responsible for commenting publicly on matters such as strategy, performance, news and opinions..

Insider trading.

If we have access to information about Viaplay Group (or about a customer, partner or supplier) that is not available outside the company – and this information would be likely to have a significant effect on Viaplay Group or another company's stock price if it was made public – then we do not share this information, conduct any transactions based on this information, suggest that anyone else conducts such transactions, or change any orders that have already been placed.

If you have questions or concerns, contact your line manager, local communications team, or Viaplay Group's Head of Compliance, General Counsel or Central Data Protection Officer.

7. Raising Concerns

We take all concerns seriously

We speak up without fear of negative repercussions

Our independent reporting system enables confidential reporting

A culture of openness.

Viaplay Group promotes a culture of openness, responsibility and accountability. We expect you to tell us immediately if you believe a violation of our Code of Conduct or applicable laws has taken place or will take place in the future – doing so makes an essential contribution to the sustainability of our culture. All concerns will be taken seriously and investigated appropriately. Managers are responsible for encouraging an open dialogue, and for supporting employees by addressing all concerns in a fair and unbiased manner. We want everyone to feel comfortable raising concerns without worrying about a negative reaction.

How to raise concerns.

Viaplay Group encourages employees to raise concerns at the earliest possible stage, and through the usual reporting lines as appropriate. You can always raise concerns with your manager's manager if you do not believe that the concern has been, or will be, dealt with appropriately. Incidents can also be reported using our whistle-blower procedures, which include an independent, confidential and anonymous reporting system. More information about our whistle-blower procedures can be found on our intranet.

8. Ethics checklist and contact information

OUR CODE IS OUR COMPASS

You are responsible for familiarising yourself with this Code of Conduct – and for seeking guidance if you are unsure whether a course of action is the right one. The ethics checklist to the right is a helpful tool. In addition to this Code of Conduct, Viaplay Group has adopted Group Policies providing further information about the areas covered by this Code; these are available on our intranet.

For more information, please contact Viaplay Group's Head of Compliance at compliance@viaplaygroup.com or Viaplay Group's Sustainability team at sustainability@viaplaygroup.com



Is it legal and does it comply with our code?



Am I comfortable with it?



How would it feel if it was shared with others?

9. Appendix

Form of acknowledgement

Note: Acknowledgement should primarily take place electronically. If you use paper acknowledgement, please give the signed copy to your local People & Culture representative.

I, the undersigned, certify that I have received and read the Viaplay Group Code of Conduct, and that I understand my responsibility to comply with this Code.

I understand that my agreement to comply with this Code does not constitute a contract of employment.

Date

Signature

Name

Company



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