

# Code of Conduct for suppliers to the North Media Group

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## **1 Purpose**

North Media is committed to carrying on business with integrity and responsibility. As a provider of communication platforms and channels and other services to businesses and consumers, our interactions with society are crucial.

North Media places great importance on being and being seen as a responsible business focused on social responsibility towards customers, suppliers, business partners and employees. This is reflected both in our published policies and in our conduct.

It is important to us to ensure that our suppliers share our commitment to ethical business conduct and social responsibility. This 'Code of Conduct for suppliers to the North Media Group' is a guideline setting out our key principles for responsible business conduct, which we expect our significant suppliers – in the following referred to as 'suppliers' – to comply with.

This Code of Conduct is intended to underscore that being a supplier to North Media helps contribute positively to society.

## **2 General requirements**

We expect our suppliers in their respective businesses to – in the same way we do – respect applicable national and international legislation and standards – whether or not they have a written code of conduct.

We therefore assume that our suppliers can identify, address and prevent risks of causing or contributing to negative impacts on sustainability matters in their own activities and require similar conduct from their business relations. North Media must be informed of any knowledge of severe negative impacts that a supplier is causing, contributing to or associated with as part of its business relations with North Media. If a supplier already generally addresses and communicates about actual significant impacts in a way that is accessible to us and appears to be reassuring, this may satisfy our expectations.

## **3 Labour rights**

At the North Media Group, we see it as our responsibility to help ensure decent working conditions for all workers in the value chains we are a part of. At North Media, we comply with the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises, and we require our suppliers to do the same with respect to their own employees and those of their sub-suppliers. We strive to ensure a workplace environment that fosters dignity, equality and fairness.

## **4 Environmental protection**

At North Media, we strive to reduce our negative impact on the environment. We acknowledge the need to minimise our environmental impact, internally as well as in our supplier chain. This section of our Code of Conduct sets out our expectations as to how our suppliers share our commitment to protecting the environment and participate actively in our sustainability efforts.

### **4.1 Environmental protection regulation**

4.1.1 North Media's suppliers must comply with applicable laws and regulations regarding environmental protection.

4.1.2 The enterprises of North Media's suppliers must comply with applicable requirements regarding disposal of waste, emissions and water protection. They must comply with all regulations regarding hazardous substances, especially with respect to storage and handling of hazardous substances and disposal of such.

- 4.1.3 The employees of North Media's suppliers must be trained in handling hazardous materials and substances if this is part of their daily work.

## **4.2 Resources and environmental impact**

- 4.2.1 The suppliers of North Media must systematically seek to prevent, minimise and mitigate any negative environmental impact of their own activities, products and services.
- 4.2.2 The suppliers of North Media must identify opportunities for a sustainable transition of their business activities and prepare a relevant action plan.

## **5 Business ethics**

At the North Media Group, we place great emphasis on business ethics and integrity, both internally and when collaborating with suppliers. Our corporate culture builds, among other things, on principles of propriety and responsibility. We expect our suppliers to share our commitment to responsible business ethics. This section of our Code of Conduct lays down guidelines to ensure that our suppliers uphold these principles as part of their business practices.

### **5.1 Corruption and bribery**

- 5.1.1 North Media's suppliers are required to comply with applicable laws on bribery, corruption, fraud and any other prohibited business conduct. Our suppliers may not offer, promise or provide any undue advantage, preferential treatment or inducement to any public official, international organisation or any other third party.
- 5.1.2 Suppliers may not, directly or indirectly, offer gifts or remuneration to North Media employees or persons representing North Media, or any of their related parties, unless the value of the gift is modest and of no material financial importance. This includes, for example, small gifts or invitations to events of limited value.

### **5.2 Money laundering**

- 5.2.1 Suppliers must actively work against money laundering in all its forms and only enter into collaborations with enterprises that conduct lawful business using funds derived from legal sources. Suppliers must take appropriate steps to detect and combat illegal forms of payment and ensure that their transfers are not used by others for money laundering purposes.

### **5.3 Sanctions lists**

- 5.3.1 North Media's suppliers must take appropriate steps to ensure that individuals or enterprises on sanctions lists endorsed by Denmark are not involved in or otherwise benefit from the supplier's business or any part of its value chain. Furthermore, suppliers must take steps to ensure that they themselves are not involved in activities that are illegal under current laws on sanctions.
- 5.3.2 Any activity intended to circumvent current sanctions will not be tolerated.

### **5.4 Responsible tax**

- 5.4.1 North Media's suppliers must act in accordance with relevant national tax and joint taxation rules and comply with transfer pricing guidelines for multinational enterprises.
- 5.4.2 Suppliers with activities in Denmark must be duly registered with the Danish tax authorities, pay VAT in a timely manner and take out statutory insurance.

## **5.5 Confidential information and data protection**

- 5.5.1 North Media's suppliers must treat the North Media Group's data as confidential and protect data against unauthorised use, unlawful processing, accidental loss, destruction, alteration or sharing.
- 5.5.2 Suppliers must ensure that personal data are processed in accordance with applicable data protection law.

## **6 Compliance**

This section sets out requirements for our suppliers with a view to ensuring compliance with this document: 'Code of Conduct for suppliers to the North Media Group'. We encourage dialogue and collaboration in the event of any violations and reserve the right to enforce sanctions, including the right to terminate the collaboration, in case of a lack of willingness to comply.

### **6.1 Obligation to collaborate**

- 6.1.1 North Media's suppliers must at all times ensure compliance with their obligations under this Code of Conduct as well as minimum standards for responsible business conduct. At the request of an entity of the North Media Group, a supplier must be able to document compliance with these obligations, by means of its policy on sustainability, social responsibility or similar. If the supplier already documents and communicates its compliance, this may be satisfactory.
- 6.1.2 We reserve the right, subject to prior notice, to perform a supplier audit or other check to verify the supplier's compliance with this Code of Conduct.

### **6.2 Reporting violations**

- 6.2.1 If a supplier becomes aware of anything indicating a not insignificant violation of this Code of Conduct or becomes aware of other severe negative impacts on people or the environment that North Media is associated with via its suppliers, this must immediately be reported to North Media's Group Executive Board.
- 6.2.2 Upon request, the supplier is under an obligation to submit written documentation of violations.
- 6.2.3 At North Media, we believe dialogue is crucial to achieving the standard set out in this Code of Conduct. In the event of a supplier's failure to comply with one or more of the principles set out in this Code of Conduct, North Media will work with the supplier on a remediation plan.

### **6.3 Termination of contract**

- 6.3.1 Where a supplier is unable or unwilling to remedy a matter or in the event of repeated violations of the principles, we will consider this to be a material breach of the contract and may enforce the sanction to terminate the collaboration.