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Supplier Code of Conduct – Digitale Medier 1881 AS

1. INTRODUCTION

Digitale Medier 1881 AS, including all its subsidiaries (collectively "1881"), is committed to promoting an ethical and responsible business culture, and to ensuring that all its activities maintain the highest level of ethical standards.

1881 seeks an open and transparent relationship with its suppliers and business partners, and strives to be the best associate for all suppliers and business partners. 1881 further strives to ensure that its ethical standards and commitment to business integrity are reflected in its supply and value chain.

This Supplier Code of Conduct sets forth the basic conduct and behaviour that 1881 expects and requires from all its suppliers and business partners.

2. SCOPE

This Supplier Code of Conduct is applicable to all of 1881's suppliers and other business partners (hereinafter collectively referred to as "suppliers"). This includes suppliers' employees at all levels, board members, hired personnel, consultants and others who act on behalf of or represent the supplier.

In addition to the Supplier Code of Conduct, all suppliers shall comply with all applicable local and international laws and regulations as well as all contractual obligations towards 1881. Where differences exist between applicable laws, regulations, the Supplier Code of Conduct or contractual obligations, suppliers shall follow the strictest requirements.

Suppliers shall implement the requirements set forth herein in their respective business activities and operations, including having in place relevant policies, procedures, training and contractual obligations towards own suppliers. Suppliers shall use their best efforts and influence towards ensuring that their own suppliers comply with these requirements and standards.

3. HUMAN RIGHTS AND WORKING CONDITIONS

Suppliers shall respect and promote fundamental human rights and decent working conditions within their business operations and supply and value chain as set forth in the UN Guiding Principles on Business and Human Rights (UNGP), the OECD Guidelines for Multinational Enterprises as well as obligations following from applicable national laws, such as the Norwegian Transparency Act.

This means that suppliers shall avoid causing or contributing to adverse impacts on human rights and decent working conditions, as well as identify, assess and when necessary cease, prevent or mitigate adverse impacts which they have caused, contributed towards or are directly linked to through their suppliers and business partners. Human rights refer to *inter alia* the rights enshrined in the UN Covenant on Civil and Political Rights, the UN Covenant on Economic, Social and Cultural Rights, and ILO's core conventions on fundamental principles and rights at work.

The above means that suppliers *inter alia* shall follow these requirements:

- **Forced labour:** Not engage in or tolerate any form of forced labour or modern slavery. Workers shall be free to end their employment, and workers' identity papers, etc. shall never be deprived.
- **Child labour:** Not engage in or tolerate any form of child labour. Minimum age of workers shall not be less than 15 years (or below any higher minimum age set out by local law). Children under 18 years must not perform any form of hazardous work, and other relevant legal requirements regarding minor workers shall be complied with.
- **Treatment and personal freedom:** Not engage in or tolerate any form of inhumane treatment, corporal punishment, use of violence, harassment or sexual harassment, and ensure the respect for personal dignity and personal freedoms.
- **Discrimination:** Provide equal opportunities for all workers and not discriminate anyone on the basis of ethnicity, gender, religion, sexual orientation, disability, political affiliation, union membership, marital status, pregnancy, age, etc.
- **Health and safety:** Ensure a safe and healthy working environment for their workers and strive to prevent work related accidents, injuries and illness. This includes ensuring proper safety equipment for personnel and machinery, and safe, clean and acceptable facilities.
- **Right to organise:** Respect the rights of workers to freely associate, join trade unions and bargain collectively. If such rights are limited by local law, suppliers shall facilitate and not hinder alternative mechanisms for free organising and negotiations.
- **Remuneration:** Compensate workers fairly and timely, and provide a living wage for its workers, which at minimum shall be at a rate equal or greater to the local minimum wage or industry standard. Local wage regulation, including when it comes to compensating overtime, shall be followed. Monetary penalties and deduction in salary as a disciplinary action is not accepted.
- **Working hours:** Ensure that daily and weekly working hours shall not exceed applicable legal requirements, including when it comes to overtime. Workers shall have at least one full day off per week, and daily rest time.
- **Local population:** Respect the rights of the local population, including the rights of marginalised and indigenous peoples, including when it comes to use of land areas, water and natural resources.
- **Routines:** Have adequate guidelines, routines and training in place to ensure the fulfilment of human rights and decent working conditions, including routines for assessing and managing human rights risk in its operations *and* in its supply chain.

4. ENVIRONMENT

Suppliers shall be committed to protecting the environment and to promoting sustainable development. Suppliers shall strive to operate in an environmentally responsible manner, and strive to prevent and minimize any harmful effects on nature and the environment.

5. ANTI-CORRUPTION

1881 has a zero tolerance for all forms of corruption. Suppliers shall refrain from and work against any form of embezzlement, extortion or corruption, including bribery, kickbacks and facilitation payments. This includes refraining from offering or accepting gifts, benefits, reimbursements or entertainment that would constitute a violation of applicable anti-corruption laws or regulations, or that could be perceived as an improper attempt to influence business decisions or to gain an improper advantage. Suppliers shall exercise increased caution when government officials are involved.

All accounting information shall be correct, registered, and recorded in accordance with applicable laws and regulations.

6. MONEY LAUNDERING

Suppliers shall not take part in any form of money laundering and shall ensure that financial transactions are not used to launder money.

7. CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Suppliers shall protect, keep confidential and not misuse any information of a confidential or proprietary nature relating to 1881 and its business partners, regardless of how and from whom such information have come to the knowledge of the supplier. Such information shall never be disclosed to any third party without prior written approval from 1881.

8. DATA PROTECTION

Suppliers shall ensure that all uses of personal data, such as collection, registration, comparison, storage and deletion, take place in accordance with applicable laws and regulations, hereunder the EU General Data Protection Regulation (GDPR).

9. FAIR COMPETITION AND BUSINESS PRACTICES

Suppliers shall support the principles of fair competition and comply with applicable anti-trust and other competition laws and regulations. This includes that no supplier shall be part of any illegal price cooperation or market sharing.

10. TRADE REGULATIONS AND SANCTIONS

Suppliers shall comply with relevant sanctions regimes, export control regulations and other international trade regulations.

11. CONFLICT OF INTEREST

Suppliers shall avoid all conflicts of interest while working for 1881. A conflict of interest occurs when a representative of a supplier seeks to further his/her personal interest (including that of a friend or relative) due to his/her position as a representative of the supplier.

12. WHISTLEBLOWING

Suppliers shall comply with all applicable laws regarding whistleblowing. Suppliers shall have systems in place for protecting whistleblowers, including for protecting their confidentiality and protecting them from retaliation.

13. INFORMATION

Suppliers shall provide all relevant information and documentation upon the request of 1881, including information regarding sub-suppliers and supply chain risks, working conditions, etc. Records of audits undertaken of the suppliers' supply chain shall be available on request.

1881 has a right to perform all inspections at the premises of the supplier, or its sub-suppliers, that are necessary to verify that the Supplier Code of Conduct is complied with.

14. Reporting and breaches

Suppliers shall immediately report any breach or suspected breach of the Supplier Code of Conduct that the supplier is aware or made aware of, including regarding breaches in its supply chain. If a supplier faces a dilemma or has any doubts regarding the above, the supplier is also advised to contact 1881.

In cases of conflicts or breaches of the Supplier Code of Conduct, suppliers shall take the necessary corrective actions in a timely manner at no cost of 1881. This may include a requirement to change sub-supplier(s) that do not comply with the requirements of the Supplier Code of Conduct, and/or a requirement to carry out necessary audits at own or sub-suppliers' premises. All corrective actions shall be documented.

Failing to comply with the Supplier Code of Conduct is viewed as a serious matter, which may lead to termination of the agreement(s) with the supplier, claims for appropriate compensation, disqualification as a supplier, and reporting to relevant authorities.