

Code of Conduct for Business Partners

Content

Introduction

- 1 Fair business practices
- 2 Social responsibility and employment rights
- 3 Equal treatment and non-discrimination
- 4 Fair pay and terms of employment
- 5 Workplace safety
- 6 Environmental protection
- 7 Partners and subcontractors
- 8 Measures in the case of a violation
- 9 Information obligation
- 10 Confirmation of compliance

Introduction

As a leading media company with more than 90 news brands, magazines, television channels, radio stations and online services, DPG Media makes an essential contribution to society every day. Through our journalistic activities, we help to ensure that information is disseminated freely and we support the constitutionally established freedom of the press in the countries in which we operate.

In our actions, we strive for responsible business practices and are committed to high ethical, social and environmental standards. These values are an integral part of our business operations and apply to all subsidiaries and affiliates within DPG Media Group NV (hereinafter DPG Media). In this regard, we respect and adhere to the laws and regulations with a view to transparency, integrity and sustainability.

We expect our partners to share these core values and principles and to conform to our Code of Conduct. This Code of Conduct forms the basis of all obligations and agreements in the business relationships between DPG Media and its partners. Together we will work towards a sustainable and responsible future in which respect for people, society and the environment take centre stage, while complying with all the relevant legislation.

1. Fair business practices

DPG Media prohibits partners from being involved in any form of corruption, extortion or embezzlement. Bribery in any form is prohibited and will not be tolerated. Any gifts and invitations must only have a small financial value. They may not be offered as bribes or kickbacks or given in exchange for something else.

Partners' decisions must be objective. Any personal, business or other conflicts of interest must be disclosed to DPG Media in advance and should be avoided.

Partners must act in accordance with international standards and regulations on unfair competition, as well as applicable cartel law.

2. Social responsibility and employment rights

Partners must at all times respect and protect internationally recognised human rights.

The use of child labour, as defined in International Labour Organization Conventions 138 and 182, is strictly prohibited. With regard to these conventions, there is global consensus on the elimination of child labour and it has been established that the minimum age for employment should not be lower than the age at which compulsory education ends.

Any form of child labour, forced labour or slavery is prohibited. Partners are to ensure that this prohibition is adhered to within their own organisation as well as the entire supply chain.

3. Equal treatment and non-discrimination

Partners guarantee equal treatment and equal opportunities for all employees, without any form of discrimination. This applies to recruitment, terms of employment, training opportunities, promotion, remuneration, dismissal and retirement. Discrimination based on origin, skin colour, gender, age, religion, disability, ethnic background, sexual orientation, political beliefs or other personal characteristics is prohibited. In addition, partners do not tolerate harassment, intimidation or abuse.

4. Fair pay and terms of employment

Partners ensure that employees receive at least the legally prescribed minimum wage and that all terms of employment guarantee an adequate standard of living. Wages are paid in full, on time and in accordance with the relevant national and international laws.

The use of structures that circumvent employment and social security obligations is not allowed.

Employees' working hours comply with relevant national and international regulations.

Partners will not undermine employees' freedom of association or any other employees' rights.

5. Workplace safety

Partners are required to comply in full with all applicable employment protection rules and to ensure a safe working environment. This includes taking appropriate measures to minimise workplace hazards and to prevent accidents, injuries and work-related risks.

6. Environmental protection

DPG Media is striving for a climate-friendly and sustainable future and expects partners to actively contribute to reducing environmental impacts (including soil, air, water and waste management) and achieving international climate goals.

In addition, partners must comply with all applicable national and international environmental laws and standards and ensure that they obtain and maintain all requisite environmental permits, approvals and registrations.

7. Partners and subcontractors

Partners must impose the principles of this Code of Conduct to their subcontractors and partners.

8. Measures in the case of a violation

If DPG Media or any of the partners identifies a risk that the standards and laws referred to in this document will be violated, both parties will immediately work together to minimise or eliminate this risk and draw up a plan to take corrective measures.

DPG Media may temporarily suspend the cooperation during the implementation of this plan. Partners must confirm the effectiveness of the measures within a reasonable period of time. In the case of repeated or serious violations, DPG Media reserves the right to terminate the business relationship.

9. Information obligation

Partners are expected to be transparent about the carbon footprint calculation and their strategy to reduce emissions. In addition, partners are expected to cooperate in terms of legal reporting requirements, such as the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD). As part of its compliance with such obligations, DPG Media may request information about partners and their supply chain. Partners must respond to the substance of written requests from DPG Media that are made under relevant national and international regulations on the subject within a reasonable period of time.

10. Confirmation of compliance

By entering into a relationship with DPG Media, the partner confirms that it agrees to this Code of Conduct.