

# Schibsted

## Business Partner Code of Conduct

# Introduction

Schibsted ASA, including its subsidiaries and majority-owned entities (collectively, "Schibsted"), is committed to operating with integrity and in accordance with applicable laws, regulations and stipulated frameworks mentioned in this document. Accordingly, we have created this Business Partner Code of Conduct ("the BP Code"), which sets forth legal requirements and expected standards to any Business Partner doing business with Schibsted.

As used in this Code, "Business Partner" refers to any company or individual that provides products, staffing, or services to Schibsted, such as suppliers, contractors, joint venture partners, agents, distributors, franchisees, customers, consultants, professional advisors and any other entity that has a business partnership with Schibsted. Our Business Partners are responsible for ensuring that their sub-suppliers and sub-contractors in their whole supply chain (delivery of services or production of goods from the raw material stage to a finished product) are aware of and comply with requirements that correspond to the principles outlined in the BP Code. Business Partners shall evaluate and monitor their sub-suppliers' and sub-contractors' compliance with laws and regulations

The BP Code prescribes two types of business integrity standards: i) Legal obligations for Schibsted's Business Partners which set out binding and non-negotiable ethical requirements (see the chapter *Compliance with laws below*) and ii) Ethical standards that Schibsted expects Business Partners to implement and adhere to (see the chapter *Expected standards of business practices below*).

Where the BP Code sets higher standards than what the law requires, Schibsted expects Business Partners to adhere to the standards set out herein. The BP Code is considered to form an integral part of the contract between Schibsted and Business Partners. It supplements, but does not supersede, the contract with Schibsted. To the extent there is any inconsistency between the BP Code and any provision of the contract with Schibsted, the contractual provision will prevail.

## **Managing non-compliance**

It is the responsibility of Schibsted's Business Partners to take immediate and relevant remedial actions with respect to any non-compliance with the requirements set out in the BP Code. Business Partners are encouraged to be transparent towards Schibsted regarding potential material breaches of laws and regulations and are encouraged to report any concerns about potential violation of the Code to Schibsted. Further, Schibsted reserves the right to terminate agreements with its Business Partners in the event of material breach of any laws, regulations and/or the BP Code.

**Legal obligations for Schibsted's Business Partners** Schibsted expects that Business Partners carry out their business honestly and ethically and operate in full compliance with applicable laws and regulations in the countries and jurisdictions in which the Business Partners operate. This is including, but not limited to, the following:

### **Anti-Bribery and corruption**

Business Partners shall comply with applicable laws and regulations concerning bribery, corruption, trading in influence (improper lobbying) and facilitation payments. Business Partners shall not request, accept, or receive any improper advantage in connection with a position, an office or performance of an assignment. Schibsted has zero tolerance for bribery and unethical practices, both in the commercial context and in relation to the public sector.

### **Anti-money laundering**

Business Partners shall firmly oppose all forms of money laundering and shall take steps to prevent their business transactions from being used by others to conceal the origins of illegally obtained money.

### **Sanctions and export control**

Business Partners shall adhere to all applicable sanctions and export control laws and regulations. Business Partners shall immediately inform Schibsted should they ever become subject to sanctions, in particular, but not limited to, sanctions implemented and enforced by the UN, EU, US, UK and Norway.

### **Protecting Data Privacy**

Business Partners shall comply with applicable data protection laws and regulations, including but not limited to the General Data Protection Regulation (2016/679)

### **Fair Competition**

Business Partners shall under no circumstances engage in a manner that violates competition laws and regulations, including inter alia entering into anti-competitive agreements/arrangements or abusing a dominant position.

### **Human rights and labor conditions**

Business Partners shall respect human rights and minimum social safeguards as set out in international conventions on human rights and working conditions. Schibsted is subject to the Norwegian Transparency Act, which sets out legal requirements in accordance with the OECD . Schibsted expects its Business Partners to perform human rights impact assessments and due diligence to identify and mitigate potential adverse impacts on human rights and decent labor conditions in relation to the Business Partners' own business activities and in relation to its supply chain, and to respond to requests from Schibsted pertaining to these activities.

Schibsted does not tolerate discrimination of any kind. Business Partners shall not accept any form of harassment or discrimination based on among others age, gender, gender expression, sexuality, disability, race, ethnicity, religious belief, political opinion, class, national origin or any other basis prohibited by laws and regulations.

### **Health and Safety**

Business Partners shall provide a healthy, safe, and secure work environment (HSE) which as a minimum is in accordance with applicable laws and regulations. Business Partners are expected to strive to have the best possible management system for HSE.

### **Whistleblowing and Grievance Processes**

Business Partners shall ensure that all their employees have the possibility to report concerns regarding potential breaches of laws and internal procedures according to applicable legislation.

## **Expected standards of business practices**

Schibsted expects all Business Partners to comply with UN Global Compact's Ten Principles and/or OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, including, but not limited to the following:

### **Conflict of Interest**

Business Partners and their employees shall not (directly or indirectly) influence any decision that can give rise to an actual or perceived conflict of interest in respect of Business Partners' cooperation with Schibsted. Conflicts of interest may include personal financial or ownership interests, inside information, offering a position, doing business with, or receiving services from, family members or other persons with whom you have a close personal relationship

### **Gifts, Hospitality and Expenses**

Business Partners shall only exchange reasonable gifts and hospitality with Schibsted's employees and only for legitimate purposes that have a clear and proper business context. Business Partners shall never exchange cash or cash equivalents (gift cards, checks or gift certificates) or loans. No gifts or business hospitality may be provided or accepted during a tender or negotiation process.

### **Environmental impact**

Business Partners shall recognize the environmental responsibilities associated with all aspects of their business and take all reasonable actions to ensure environmentally friendly business practice, apply a precautionary approach to environmental challenges, promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies. Business partners are also expected to share data on environmental performance when needed.

### **The freedom of expression and the freedom of the press**

The freedom of expression and the freedom of the press shall be respected. All employees shall have the right to hold opinions without interference, and to seek and receive information and ideas through any media regardless of borders.

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