

Schibsted Code of Conduct

Schibsted



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Letter from CEO



Schibsted is a family of brands, and we share a set of values and principles that guide us whenever we make decisions as a company or find ourselves at a crossroads.

Everything we do as a company reflects these values and principles. Our mission is to empower people in their daily lives. Our vision is to contribute to a society built on trust and transparency. And at our core, we are a fear-

less force for change. We are inspired by this common purpose and supported by a shared foundation, shared goals and shared principles that unite us. Because of this, we always strive to ensure that Schibsted's products and services help people make informed choices, live more sustainable lives, and build greater trust among one another.

Just as we have a set of principles that guide us as a company, we have established a set of principles to guide us as individuals. The Schibsted Code of Conduct outlines the norms, responsibilities and proper practises that are expected of us as Schibsted employees, regardless of role, title, brand or location. In short, the Code of Conduct describes how things should be done – and serves a record of how we can be at our best today and what to strive for in the future.

In the end, it comes down to integrity. Schibsted's real impact comes from people finding value in our products and services and making our offerings a part of their lives in ways that change how they act, consume and understand the world. For us to keep succeeding,

people must continue to place their trust in us and believe in our integrity – as both brands and as people. Doing the right thing is simply good business.

I expect every Schibsted employee to commit to the Code of Conduct and live by it every day. We must follow the uniting principles we have set and continue to amplify our impact. Only then can we achieve our ultimate ambition to truly empower people in their daily lives.

Kristin Skogen Lund, CEO Schibsted

Being a part of
Schibsted means
following the **code**

Being a part of Schibsted means following the code

Trust is essential to our business, and to gain it we must earn it. This means that in everything we do, we aim to be fully compliant with all legal requirements, follow best practices and act with integrity.

Within our Code of Conduct (the “Code”), we describe the norms, responsibilities and proper practices that are required from all of us. The principles laid out in this document define how we act and what it means to do the right thing in Schibsted. We believe that by establishing clear, ethical standards and clarifying what is expected of us when doing business, we are more likely to make good decisions.

Our Code explains Schibsted’s stance and values for areas of risk that are particularly relevant to us. It guides us through everyday dilemmas and explains how and when to get more information and ask for help. It’s not possible to cover every possible scenario

that we may encounter, but by reading and understanding the Code, we will all be better equipped to handle unexpected situations and do the right thing.

What is Schibsted’s commitment?

As a responsible company, Schibsted operates lawfully, with a high degree of integrity and transparency, in accordance with the existing and emerging regulations and standards of a sustainable business.

For us, sustainability means taking responsibility and being transparent about both the positive and negative impact we may have on society and the environment, in the short- and long-term.

Schibsted is a participant in the UN Global Compact and supports their Ten Principles for corporate sustainability which are reflected in this Code.



Explained

The UN Global Compact seeks to advance 10 principles in the areas of human rights, labour, environment and anti-corruption. All companies that have joined the Global Compact are expected to implement the principles in their business operations.

The Code applies to all of us

This Code applies to all of us in Schibsted, including all employees, leaders, and our Board of Directors, as well as all companies that are part of the Schibsted family.

Our Code gives an overview of the most relevant governing principles for Schibsted and our subsidiaries. All subsidiaries are expected to implement this Code so that we all follow the same principles and guidelines.

We also expect our partners, contractors and other hired personnel who work with us in our operations to meet our standards and respect our values as outlined in the Code.

What is expected of leaders?

- Ensure that all employees know and understand our Code and ensure their understanding is maintained.
- Create a culture in which ethical conduct is recognised and valued.

- Ensure a safe working environment in which all employees feel comfortable raising concerns.
- Ensure appropriate organisational structures to effectively handle legal, ethical and sustainability issues and performance.

- Lead by example always.

What is expected of everyone?

- Read and understand our Code.
- Implement the principles outlined in our Code in day-to-day work activities.
- Attend relevant trainings.
- Actively seek out information from your manager or the policy owners if you have questions, face dilemmas or simply want to know more about the policies and guidelines in place

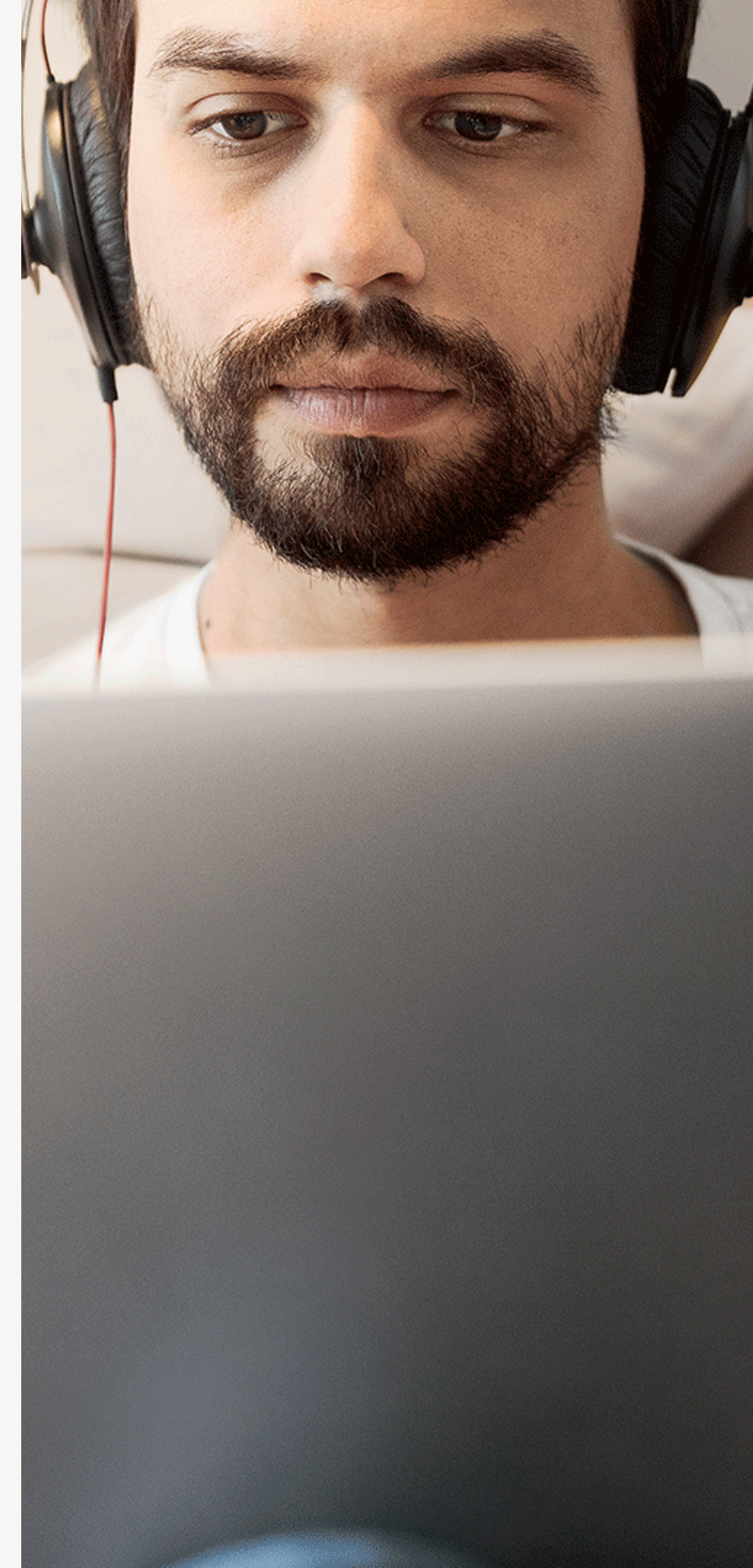
- Know and understand all policies and guidelines that may be relevant for your work.
- Raise concern if you suspect illegal or unethical business conduct.

Speak up if you suspect breaches

Violations of the Code are not accepted and may result in liability for both the company and individuals.

If you believe that a behaviour or condition is not in line with our Code or our values, we encourage you to report your concern. How and when to report concerns is described in the Speak Up chapter.

Any questions or doubts related to the understanding, use or implementation of the Code can be raised to your manager or to Schibsted's Group Compliance Officer.



We don't tolerate corruption

Anti-corruption

We don't tolerate corruption

Corruption erodes trust and undermines legitimate business activities and fair dealings. It has a negative impact on companies, people, and society, which is why it's illegal according to international and local laws.

Corruption has an adverse impact on our company, culture and reputation, and it poses a significant risk to running a sustainable and responsible business.

We have a zero-tolerance policy for corruption and other economic crimes.



Defined

Corruption is the abuse of entrusted power for private gain. It may include acts such as bribery, trading in influence and facilitation payments, among others.

Bribery is the act of offering, providing, authorising or receiving an improper financial or other advantage intended to influence a transaction or decision, or to encourage misuse of a person's position.

Trading in influence is bribery of an intermediary/third party in relation to his/her work to influence someone.

Facilitation payments are payments offered to or made to a public official to secure or speed up a public decision or approval process that is both routine and necessary.

What is Schibsted’s responsibility?

We act with a high degree of transparency and integrity to ensure our actions and decisions are always in the best interest of our customers, our business and society.

We are committed to act professionally and fairly in all our business activities and relationships wherever we operate.

We will continue to implement and enforce effective systems to counter corruption.



Explained

Corrupt payments often have certain characteristics:

Personal enrichment of decision makers (in public or private sector) or of someone in Schibsted

Given with the intent of influencing certain decisions, such as a tender, contract negotiations, a permit or license from a public office, or the decision to enter a joint venture

Not offered or given in a transparent manner

Measures are taken to hide or disguise the money trail

What is expected of me?

- Strive for the highest standards of transparency and integrity, always.
- Maintain books and records to reflect our business accurately and fairly.
- Assess and discuss potential or actual corruption risks transparently.
- Ensure that everyone we work with understands that bribery and corruption are unacceptable to us.
- Raise concerns promptly if corruption or other economic crimes are suspected or known in Schibsted or to any party with whom we do business.
- Evaluate potential corruption risks and mitigate any potential identified risks when entering new relationships with business partners.

Find out more

Contact:
[Group Compliance Officer](#)



Guidelines

How to handle gifts and hospitality when representing Schibsted:

- Ensure all expenses comply with applicable laws and internal guidelines.
- Have a proper business context when accepting, offering or receiving business hospitality.
- Gifts and business hospitality must never be extravagant and should be in line with customary business practices.
- No gifts or business hospitality may be given or received during a tender or bidding process.
- Cash or cash equivalents may never be offered, given or received.
- When assessing whether business hospitality offered is appropriate, assess not only monetary value but also the frequency.

We compete fairly

Antitrust

We compete fairly

Antitrust regulations are in place to protect and enhance fair competition in the market.

We follow the antitrust rules that are intended to promote economic welfare and ensure efficient allocation of resources across the market.



Explained

Antitrust rules are designed to target anti-competitive agreements and concerted practices between companies, unilateral abuse of market power by dominant companies, as well as anti-competitive mergers and acquisitions.

What is Schibsted's responsibility?

We have principles and guidelines in place to safeguard fair competition.

We expect our employees to be committed to reducing the risk of antitrust violations and sanctions.

What is expected of me?

- Exercise great caution when dealing with actual or potential competitors in any setting. We don't exchange sensitive information, neither directly, through associations, nor via any other third party.
- Safeguard that all commercial agreements we enter are within the boundaries of applicable anti-trust rules.
- Use caution when entering into supplier or customer agreements, when cooperating with direct or potential competitors, and when acting in markets where our position is strong (typically 35-40% market share or higher), as well as M&A opportunities or joint ventures.
- Use caution when operating in areas where there may be additional restrictions related to competition.
- Raise concerns if uncertain about how the principles and ground rules may affect activities in Schibsted. This topic is complex, so do not hesitate to reach out for advice.

Find out more

Contact:
The Legal department [here](#) and [here](#)



Did you know

The highest fines issued by Norwegian and European authorities are related to anti-trust breaches. Fines in the range of 10-50 million Euro are commonly used.

We work with responsible partners

Business partners

We work with responsible partners

The conduct of our business partners may negatively impact our reputation and expose us legally.

We expect our values and ethical standards to be respected and upheld by our business partners.



Define

The term **business partners** include individuals and entities such as our suppliers, contractors, joint venture partners, agents, distributors, franchisees, customers, consultants, professional advisors and other relevant partners.

What is Schibsted's responsibility?

We aim to build long-lasting relationships with our business partners based on mutual trust.

We only work with business partners that demonstrate satisfactory standards of responsible business and respect our ethical values.

We comply with local and international standards and legislation, and we are committed to promoting human rights protection throughout our value chain.

Our suppliers must conduct their business in line with internationally recognised and endorsed standards in key legal areas, such as human rights, labour rights, environmental law, sanctions and restrictive measures, export-control, anti-corruption, and other compliance areas.



What is expected of me?

- Exercise caution when selecting business partners and evaluate compliance and sustainability risk in the decision-making process.
- Exercise particular caution if a business partner, their management or owners are in a high-risk region, such as offshore jurisdictions, jurisdictions rated as high risk for corruption, and/or countries subject to sanctions regimes.
- Conduct third-party due diligence in accordance with internal procedures when deemed necessary and comply with applicable trade controls, including sanctions regimes and requirements related to import and export.
- Expect the suppliers to comply with our Supplier Code of Conduct when working with us.
- Raise concern if made aware of a business partner that conducts business in a manner that could reflect negatively on Schibsted.
- Raise concerns if uncertain about how the principles and ground rules may affect activities in Schibsted. This topic is complex, so do not hesitate to reach out for advice.

Find out more

Look into:
[Schibsted's Supplier Code of Conduct](#)
[Our work with human rights and decent working conditions](#)

Contact:
[Group Compliance Officer](#)
[The Legal department](#)



We communicate openly and respectfully

Communication

We communicate openly and respectfully

We communicate in a manner that upholds trust and transparency, and we always show respect and continually strive to maintain our credibility.

We are committed to our shared values and principles whenever we communicate, and in doing so we safeguard our brand and strengthen our reputation to support our business activities and interests.

The principles of confidentiality are critical to how we communicate, and we always aim to protect Schibsted's assets and reputation in all forms of communication.



What is Schibsted's responsibility?

We share information in accordance with the requirements for listed companies, and we adhere to all applicable laws, regulations and standards.

Schibsted's brand platform and 'voice & tone' guidelines support us on how we communicate with stakeholders, ensuring consistency in our tone of voice and visual expression.



What is expected of me?

- Contribute to maintaining Schibsted's reputation in the market, media and towards the public.
- Do not disclose confidential information about Schibsted. This includes information about results, future investments, strategies and plans that have not been presented to the public.
- Be respectful and considerate when using social media, particularly in reference to Schibsted, our business, our colleagues and our competitors
- Contact Group Communication for approval and guidance if asked (by media or other external stakeholders) to comment on behalf of Schibsted.

Find out more

Look into:
[Schibsted Brand Guidelines](#)
[Schibsted's brand platform](#)
[Schibsted's voice & tone guidelines](#)

Contact:
[Group Communication team](#)



Guidelines

Using social media as a Schibsted employee:

- We encourage employees to use their social channels to share Schibsted stories, employee experiences, and public news and information, to support our positive reputation.
- We ask everyone to be considerate when sharing these stories and reflect on how it may impact the company's brand and reputation.
- Use good judgment when engaging in online conversations related to Schibsted to avoid areas of security and reputation risk for the company, such as the release of confidential information.
- Remember that only designated spokespeople should make official statements or release information on behalf of Schibsted, so if contacted either online or in-person for comment, reach out to Group Communications for support.

We make fair decisions

Conflicts of interests

We make fair decisions

Our decisions are based on objective and fair assessments of Schibsted's interests.

Even the suspicion of a conflict of interest can challenge our integrity and may have a negative impact on our reputation and business.



Explained

Conflicts of interest arise when our personal, social, financial or political activities affect the work we do or our loyalty to the company. Personal interests include financial interests, business opportunities, outside employment or directorships, as well as the interests of close family and friends.

What is Schibsted's responsibility?

We don't allow decisions that are made on behalf of Schibsted to be influenced by our own personal interests.

We don't use confidential company information that we may become aware of (as representatives of Schibsted) for personal benefit or for the advantage of others.

We are committed to being open and transparent to prevent actual, potential or perceived conflicts of interest.

We adhere to conflict-of-interest rules in relation to relevant press ethics criteria.



What is expected of me?

- Remain impartial and professional in any dealings with business partners.
- Be transparent in any actual or potential conflict of interest situations.
- Always disclose any actual or potential conflicts of interest to your supervisor.
- Actively avoid and eliminate conflicts of interest or situations that may appear to be a conflict of interest.
- Maintain zero-tolerance for making personal gain from Schibsted's business transactions.
- Conduct fair, transparent and well-documented procurement processes.
- Before making personal investments in other companies, consider whether such investments could lead to a conflict of interest.

Find out more

Contact:
[Group Compliance Officer](#)



Guidelines

Be aware of certain situations that may be a conflict of interest:

- Holding a job or performing services on behalf of one or more of our competitors, customers or suppliers.
- Operating a business on your own time that is similar to your work in the company.
- Having a personal or financial interest in a company that has transactions or business with Schibsted, such as one of our competitors, customers, suppliers or where Schibsted has an ownership interest in the company.
- Having family members or another person with whom you have a close personal relationship do business with the company.
- Having family members or another person with whom you have a close personal relationship that invest in one of the company's competitors, suppliers or customers.

We protect our assets

Data security

We protect our data

Data is Schibsted's most essential asset and critical to our business model.

Many of our services are distributed online and maintaining proper cybersecurity is a prerequisite for ensuring the right level of confidentiality, integrity and availability of the data.

It's crucial to secure information and data as well as to protect the business from disruption.

The current regulations on collecting and using personal data require information security controls to be implemented by design.



Did you know

Businesses are an increasing target for cybersecurity attacks, and many have been paralysed as a result. Many such attacks are ransomware attacks and are accompanied by request for ransom from the attackers to decrypt business-critical data that has been “taken hostage” in an attack.

What is Schibsted's responsibility?

We maintain effective and proportionate security mechanisms to ensure that data assets have the right level of confidentiality, integrity and availability.

Our security capabilities are designed to identify risks, protect our information and data, detect and respond to breaches and attacks, and ensure our ability to recover from any breach or attack.

We have in place adequate control mechanisms for all products, applications, and processes, and we conduct regular tests of backup solutions for all critical assets and on our Continuity and Disaster



What is expected of me?

- Keep your phone, laptop, and apps up to date.
- Always protect your password and use multifactor authentication (MFA) whenever possible.
- Never click on suspicious emails or links.
- Complete your mandatory security awareness training.
- Be aware of how to detect and report security incidents.
- Know how to find and use the Security Handbook for security questions.

Find out more

Look into:
[The Security Handbook](#)
[The Security Community](#)
[Sign up for "The Security Newsletter"](#)

Contact:
[Schibsted Data Security Team](#)



We make work safe for everyone

Diversity and inclusion

We make work a safe place for everyone

Schibsted is dedicated to creating an inclusive work environment for everyone.

Different perspectives are inherent in diversity. We strive to foster an environment in which our employees feel respected, valued and empowered.

We want our employees to have a sense of belonging and be at the forefront in helping to promote and sustain an inclusive workplace.

We believe that our diversity is a key driver of innovation in Schibsted, and we can create business value when we combine our diversity and inclusivity focus with a work environment that encourages everyone to participate and contribute.



What is Schibsted's responsibility?

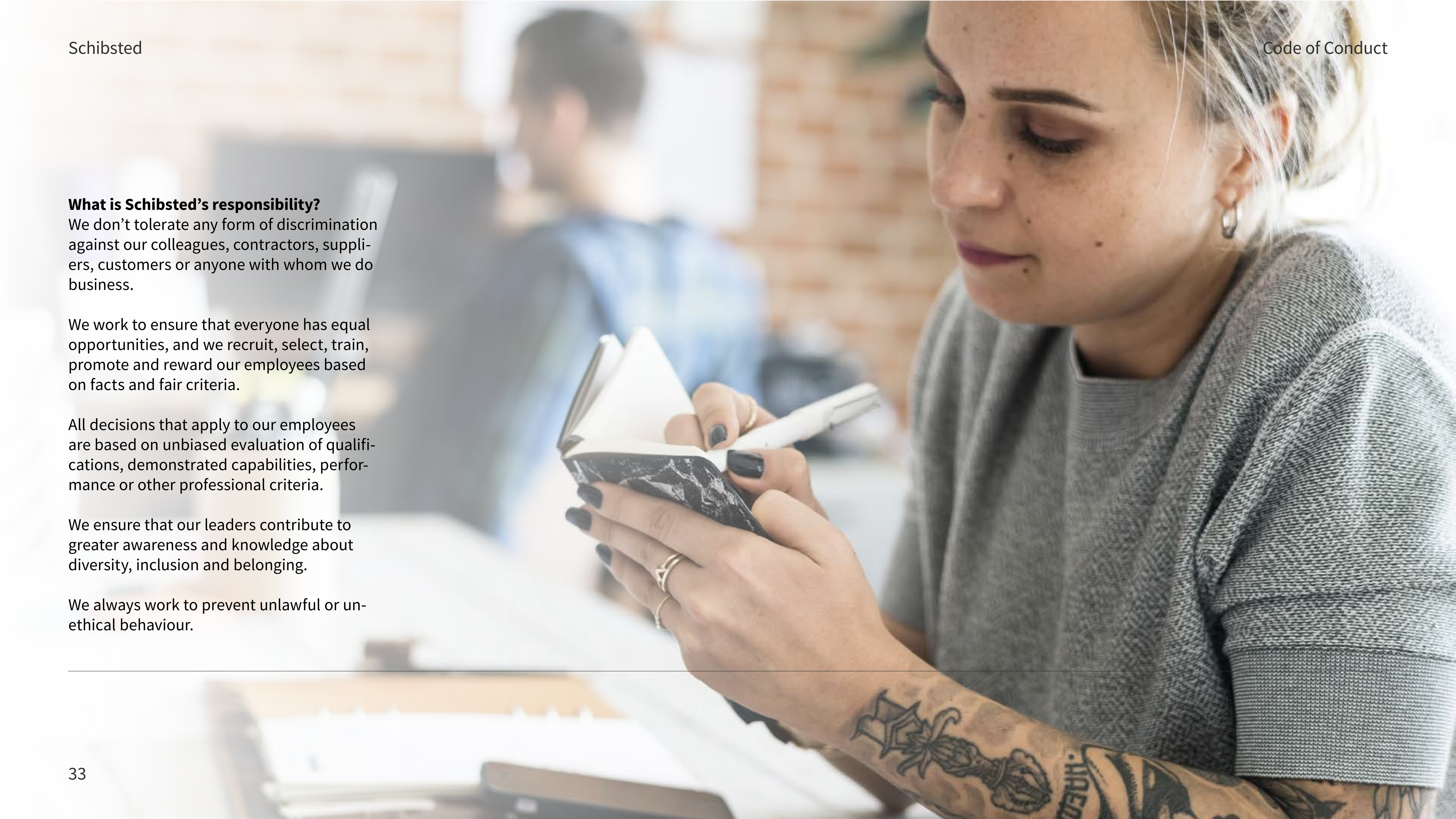
We don't tolerate any form of discrimination against our colleagues, contractors, suppliers, customers or anyone with whom we do business.

We work to ensure that everyone has equal opportunities, and we recruit, select, train, promote and reward our employees based on facts and fair criteria.

All decisions that apply to our employees are based on unbiased evaluation of qualifications, demonstrated capabilities, performance or other professional criteria.

We ensure that our leaders contribute to greater awareness and knowledge about diversity, inclusion and belonging.

We always work to prevent unlawful or unethical behaviour.



What is expected of me?

- Always treat others with dignity and respect.
- Address and report inappropriate behaviour and comments that are discriminatory, harassing, abusive, offensive or unwelcome.
- Foster teamwork and employee participation and encourage different employee perspectives.
- Seek out insights from employees with different experiences, perspectives and backgrounds.
- Support flexible work arrangements for co-workers who have different needs, abilities and/or obligations.
- Be open-minded about giving and receiving constructive feedback to enhance the culture of inclusion.

Find out more

Look into:
[Discrimination, bullying and harassment policy](#)
[Diversity and inclusion policy](#)
[Recruitment policy](#)

Contact:
[Head of Diversity, Inclusion & Belonging](#)



Guidelines

Schibsted's responsibility for creating an inclusive workplace:

- Conduct regular and sustainable competence upliftment of all employees on diversity, equity and inclusion topics.
- Provide all employees with a safe channel to voice concerns regarding diversity, equality and inclusion in our workplace.
- Support flexible work arrangements that accommodate the different needs of all employees.
- Conduct periodic employee surveys and potential studies to identify the areas in which our company supports inclusive practices, as well as where there is room for growth.

We minimise negative impact

Environment

We minimise negative impact

We are committed to minimising any adverse impact that our operations may have on the environment, and we work to run our business as sustainably as possible.

Awareness and transparency related to our environmental footprint are crucial to ensuring our stakeholders' trust and interests.



Defined

Environmental footprint is the impact a company has on the environment throughout its value chain. For example, this includes the amount of natural resources that the company uses or the amount of greenhouse gasses it emits through its operations.

What is Schibsted's responsibility?

We take responsibility for our impact on the environment.

We reduce the negative environmental impact of our operations in line with internationally recognised standards.

We take a precautionary approach to all materials and processes used in our operations that may damage the environment.

We run initiatives that promote greater environmental responsibility in our operations while encouraging the development and promotion of environmentally friendly technologies.

We empower circular and sustainable consumption through our products and services.

What is expected of me?

- Assess and address the environmental impact of business decisions as well as in our daily work.
- Always consider whether travel is necessary, and when it is, do your best to choose the most sustainable travel option.
- Consider the environmental impact when purchasing products and services and evaluate suppliers based on responsible business criteria.
- Promote environmental responsibility through our business and share best practices related to environmental efforts and opportunities so that we can all improve.

Find out more

Look into:
[Group Environmental Policy](#)
[Group Travel Policy](#)

Contact:
[Head of Sustainability](#)



We support freedom of speech

Freedom of speech

We support freedom of speech

We are committed to freedom of speech, freedom of the press, as well as the social mission of editor-controlled media.

We adhere to the Code of Ethics of the Norwegian and Swedish Press, which states: “It is the task of the press to protect individuals and groups against injustices or neglect, committed by public authorities and institutions, private enterprises or others.”

We contribute to society beyond our daily business activities. The values on which the journalistic history of Schibsted are based are important to our employees and for our larger, societal purpose.

We acknowledge and encourage everyone’s duty and right to utilise freedom of speech and to participate in the public debate.



What is Schibsted's responsibility?

We respect the independence of our editors, protect their freedoms and enable our editor-controlled media to fulfil its social mission.

It's essential that we don't make decisions concerning the non-editorial part of the Schibsted's activities, that may threaten the media's ability to fulfil its social mission.



What is expected of me?

- Ensure proper protection of sources, no matter how information about sources is obtained.
- Know and understand the meaning and content of the key terms that support our values related to freedom of speech.
- Raise concern regarding potential violations of freedom of speech.
- Contribute to a working environment in which everyone is able and encouraged to express their opinions.

Find out more

Contact:
[Group Communication team](#)



Explained

- Freedom of speech is a human right and is enshrined in both international laws and treaties as well as in national legislation.
- Freedom of the press concerns the media's right to conduct free and uncensored dissemination of news, criticism and debate.
- Freedom of speech is closely linked to personal freedom and is a prerequisite for a functioning democracy.

We support human rights and labour rights

Human rights and labour rights

We support human rights and labour rights

Respect for human rights and labour rights is the global standard, and it's our responsibility to comply with internationally proclaimed human and labour rights in all our activities, wherever we operate.

We respect human rights in accordance with the UN Guiding Principles on Business and Human Rights and the ILO Conventions.



Explained

International Labour Organization (ILO) Conventions are developed through negotiations between member state representatives from trade unions, employer organisations and government in an annual conference. The ILO Conventions cover important topics such as basic human rights, minimum wage, industrial relations, employment policy, social dialogue, social security and more.

The UN Guiding Principles on Business and Human Rights are a set of guidelines for both countries and companies that are designed to prevent, address and remedy human rights abuses in business. The principles are divided into three pillars: protect, respect and remedy. Each pillar includes concrete actions to prevent human rights abuses and provide remedies if such abuse occurs.

What is Schibsted's responsibility?

We work actively to integrate respect for human rights and labour rights into our practices and business activities.

We provide all employees with a decent salary and regulated working hours and enforce zero-tolerance for child labour in our operations and that of our suppliers and business partners.

We always strive to uncover risks of violation in all our operations, and we exercise a high degree of caution when operating in regions where the public protection of human and labour rights are poor.



What is expected of me?

- Work actively against any negative impact on human rights and labour rights related to our activities.
- Expect suppliers and business partners to respect human rights and labour rights in accordance with our principles and standards.
- Be aware if a supplier and business partner refuses to commit to our principles and standards on human rights and labour rights or is not willing to act transparently.
- Report on any actual or potential violation of human rights or labour rights by colleagues, employees of our business partners, suppliers, customers and anyone impacted by our operations.
- Recognise the right to collective wage negotiations and the freedom of organising.

Find out more

Look into:
[Supplier Code of Conduct](#)
[Discrimination, bullying and harassment policy](#)
[Our work with human rights and decent working conditions](#)

[Diversity and inclusion policy](#)
[Recruitment policy](#)

Contact:
[Head of Sustainability](#)



We do not share or trade on inside information

Insider rules and insider information

We do not share or trade on inside information

We comply with the securities laws and stock exchange regulations.

Schibsted employees may receive insider information about Schibsted, listed companies in which Schibsted owns shares and other listed companies that we relate to in business. Sharing insider information with others, who may then make financial transactions based on that information, is considered a violation of our policies and the law.

It's a personal criminal offense and violation of our ethical standards to trade shares or other financial instruments based on insider information.



Defined

Insider information is any non-public information that is expected to impact the stock price of a company if it was made known to the public, such as financial results not yet disclosed publicly, information about planned mergers and acquisitions, material investments, senior management changes and significant business disruptions or material legal matters.

Insider trading means trading of shares or other financial instruments, or the incitement of others to trade shares or financial instruments, while in possession of insider information.

What is Schibsted's responsibility?

We are committed to the proper administration of our financial accounts, and we meet the requirements of financial laws and regulations.

We are required to disclose the company's results openly and accurately, and to submit financial reports or other statutory public reports.



What is expected of me?

- Keep insider information confidential and never share with anyone internally or externally unless you have been authorised to do so.
- Handle insider information with the highest degree of care to ensure it is neither misused nor comes into the possession of others.
- Do not trade shares or other financial instruments in the company to which the information relates.
- Never advise or make suggestions about the trading of shares or other financial instruments in the company to which the information relates.
- Be aware of the business or legal issues that may impact the price of Schibsted stock or that of a business partner or customer.

Find out more

Look into: [Schibsted's rules for handling insider information](#) | Contact: [Investor Relations](#)



Explained

We may receive or become aware of **insider information** that could impact the share prices. Some examples of this type of information include the following:

- Unpublished information on financial results
- Significant acquisition or investments
- Business-critical issues or incidents
- Other, similar information concerning the company in question.

We don't launder money

Money laundering

We don't launder money

We comply with the rules on anti-money laundering to prevent Schibsted from being used by third parties to launder money or to make funds available for terrorism or other criminal activities.



Defined

Money laundering can be defined as transforming the proceeds of crime into a legitimate economy. The proceeds of a crime can be anything of value, including money, goods, assets and real estate. It can often appear in connection to other types of crime, including fraud, corruption and tax evasion.

What is Schibsted's responsibility?

We comply with local and international laws and take necessary action to prevent money laundering in our financial transactions.



What is expected of me?

- Be familiar with the basic principles that apply to anti-money laundering.
- Ensure that any business partner/customer is legally established and runs a law-abiding business before entering into any agreement.
- Report any suspicious transactions, including third-party payments, large cash purchases or the use of cash equivalents, to the appropriate internal channels.
- Be familiar with and adhere to additional requirements that apply to regulated entities when working for or representing Schibsted Financial Services.
- Notify in accordance with our procedures if there is reason to suspect, or discover, that money laundering has taken place. This is mandatory.

Find out more

Contact:
[Group Compliance Officer](#)



We protect people's privacy

Privacy

We protect people's privacy

We protect the personal data we process about our customers, users, partners and others with whom we engage in our business activities.

Data is one of Schibsted's most important assets and an essential part of our business model.

We are transparent about how personal data is processed, and we provide choice and control for managing the use of data.

We aim to create value for our customers with the data, always ensuring that their trust is maintained, as well as the reputation of our valuable brands.



Defined

Privacy means protecting the individual's ability to know how their personal data will be collected, shared and used, and to allow them to exercise choice and control over the use of their personal data.

Personal data is defined as any information that can be linked to an individual, such as customers or employees.

What is Schibsted's responsibility?

We comply with relevant data protection rules, including the General Data Protection Regulation (GDPR).

We train employees in privacy and expect everyone to take responsibility for the personal data we handle in our work.

We provide user controls and choices that are effective, understandable and easy to access. We promote responsible online advertising by maintaining ethical standards for targeting and controlling the third parties with whom we share data.

We do what we say and say what we do, and we are transparent about how personal data is processed.



What is expected of me?

- Ensure that access to personal data is on a strict, need-to-know basis.
- Delete or anonymise personal data as soon as it is no longer necessary for the original purpose.
- Strictly refrain from sharing personal data with third parties unless the sharing of data has a valid legal basis and reason.
- Assess and document all new personal data processing before processing is started and follow “privacy by design” principles.

Find out more

Look into: [Privacy function site](#) | Contact: [Schibsted Privacy Function](#)



Explained

- **General Data Protection Regulation (GDPR)** is a legal framework that sets guidelines for the processing of personal data about individuals in the European Union (EU).

We use technology responsibly

Technology

We use technology responsibly

We believe that the responsible use of technology is key to delivering value to our users.

If we fail to develop and use technology in line with our users' best interests and expectations, we risk undermining the trust in our brands and products.



Defined

Technology is the practical use of scientific discoveries.

For Schibsted, computational technologies and applications, such as programming, algorithms and artificial intelligence (AI), are especially important.

What is Schibsted's responsibility?

We recognise that technology is a product of human decisions and can be biased, for example, through conscious or unconscious encoding of human prejudice and stereotypes.

We work to minimise the risk of bias in technology by adhering to regulations, our internal standards and internationally recognised human rights.



What is expected of me?

- Conduct appropriate risk analyses when working with and/or using technology.
- Consider topics such as fairness, accountability, sustainability and transparency (FAST) when working with emerging technologies such as AI.
- Take action to mitigate any risks identified.

Find out more

Look into:
[Schibsted's Technology Strategy](#)
[Best Practices for working with AI](#)
[The Schibsted FAST framework for AI risk assessment](#)



We speak up

Reporting of concerns

We speak up

We believe that an open and respectful working environment is crucial for our development and success.

A culture in which we all feel comfortable to raise our questions and concerns is a prerequisite for creating an environment for our development and success.

When we speak up about concerns regarding behaviours or conditions that are not in line with our Code, we are able to take action and improve the situation.



Explained

What and when to report?

If you believe that a behaviour or condition is not in line with our Code or our values, we encourage you to report your reasoned concerns.

If you believe that a behaviour or condition is illegal or can endanger the safety of a person or product, you are expected to speak up.

Questions about or issues with your employment conditions or performance reviews or a personal grievance are generally not considered a report of concern and should be discussed with your manager or your HR contact.

What is Schibsted's responsibility?

All reported concerns are taken seriously and followed up in a fair and objective manner.

We ensure that no one who reports responsibly (and does so in good faith) will be met with negative reactions.

We have implemented a digital Speak Up channel as a supplement to internal reporting. In this channel, reporting can be done anonymously.

Schibsted's Speak Up Committee is responsible for conducting an initial assessment of all reported cases and coordinating the follow-up actions.



What is expected of me?

- Speak up if there is reason to suspect any illegal or unethical conditions.
- Do so in good faith.
- The intention should always be to support Schibsted in doing business the right way.
- While anonymity is always an option, we encourage you to include contact details, when possible, as personal follow-up helps ensure the best possible handling of a report.

Find out more

Contact:
[Group Compliance Officer](#)



Explained

Where to report?

Please discuss your concern openly with your line manager.

You can report concerns to one or more of the following: Schibsted's Legal department, Schibsted's Group Compliance Officer, Schibsted's Executive Management or Schibsted's Speak Up channel

About Schibsted

Schibsted is a family of digital brands with a strong Nordic position, with about 6,000 employees. Millions of people enjoy interacting with our companies every day through our online marketplaces such as FINN, DBA, Blocket and Oikotie; our media houses including Aftenposten, VG, Svenska Dagbladet and Aftonbladet; and digital services like Lendo. We also help new promising businesses grow. Our joint mission of empowering people in their daily lives is rooted in the values of our media heritage and a legacy of bold change. At our best, we are a fearless force for change in a society built on trust and transparency.

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**For any questions about
this report or media
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