## Business Partner

# Code of Conduct





### Intro

We are committed to conducting business with integrity, responsibility and in compliance with all applicable laws and regulations. We expect the same commitment throughout our value chain.

This Code of Conduct for Business Partners sets the foundation of our partnership and how we do business. We expect our business partners to live by the same values that we do and that we together do everything we can to have a positive impact - while we soundtrack the world.

By "business partner" we mean any person or entity doing business with us, including but not limited to suppliers, partners that sell our products and services and representatives conducting business on our behalf. We expect all business partners to comply with all applicable laws and regulations.

Should differences exist as a result of local customs, business practices, norms, laws, or regulations, either this Business Partner Code of Conduct or local requirements must be applied, whichever sets the strictest standard of conduct.

### Thriving Together

### Open and non-discriminatory workplace

All business partners shall treat their employees equally and fairly. Harassment and discrimination is not accepted and we expect our business partner to have a zero-tolerance against retaliation against employees who report, engage in investigations, or reject any form of harassment.

#### Safe and healthy workplace

The Business partner shall work ambitiously, through continuous improvement, for a healthy, safe and secure work environment, which as a minimum follows applicable law.

The Business partner shall strive towards a safe and injury-free workplace that protects the health and fosters the well-being of employees and all persons directly or indirectly related to the company's operations, for example, contracted workers or consultants. No employee or individual at the workplace should be at risk of injury.

The business partner shall ensure that employees and workers have the awareness, skills and knowledge necessary to prevent accidents and occupational illnesses as best as is feasible.



### Human rights

All business partners shall respect and support internationally proclaimed human rights.

#### Forced labor:

The Business partner shall not force people to conduct work for them and/or employ people against their own free will. Personnel should not be required to lodge "deposits" or identity papers upon commencing employment at the Business partner.

#### Minimum age of labor:

The Business partner shall not employ workers that are under the age of 15 or below the age of applicable minimum legal age, whichever is higher. The Business partner shall also ensure the protection of young workers, who are between the ages 15 and 18, by limiting their schedules and tasks including heavy work, hazardous work and night shifts.

#### Freedom of association and right to collective bargaining:

The Business partner shall not limit employees' right, to the extent allowed by applicable laws and regulations, to form a workers' council, collective bargaining unit or other employee representations, and to enter into collective bargaining agreements.

#### Working hours:

The Business partner shall comply with local law or agreements regarding working hours and do not permit working hours that are not in compliance with local laws and industry standards.

#### Wages:

The Business partner shall ensure that wages paid to employees and hired labor are considered fair and comply with local laws and regulations.

# Caring for the environment

Not only must business partners ensure to comply with all applicable environmental laws and regulations. We expect them to actively strive to limit the negative impact of their operations and supply chain on the environment.

This includes, but is not limited to, (i) obtaining all required environmental permits/approvals/ registrations in order to operate (ii) actively reducing consumption of resources such as energy, materials, and water, (iii) reducing or eliminating waste in a controlled and legal way.

We encourage our business partners to be an active partner in reaching our climate goals through careful monitoring of the climate footprint and implementing effective measures to minimize the climate footprint from the business partners' operations.





### Doing Business

We expect our business partners to commit to conduct their business in an honest and ethical manner, acting in accordance with the highest standards of integrity, openness and accountability in accordance with applicable law.

### Anti-bribery and corruption

We conduct our business with integrity and do not tolerate any form of bribery or corruption. In addition to always acting in accordance with applicable anti-bribery and corruption legislation, business partners, their representatives and their subcontractors shall refrain from acts or omissions that could be construed as a form of bribery or corruption. Business partners shall at all times compete on their merits. All business courtesies must be lawful, in compliance with the recipient's policies and consistent with market practice.

The business partner shall agree to have zero-tolerance for corruption and to ensure compliance with all governing anticorruption laws, conventions and regulations. The business partner shall not, in order to obtain or retain business or other improper advantage in the conduct of business, offer, promise or give any undue advantage to a public official (or a third party) to make the official act or refrain from acting in relation to the performance of his/her duties. This applies regardless of whether the advantage is offered directly or through an intermediary.

#### **Conflicts of interest**

Conflicts of interests between us and our business partners, or the appearance of a conflict of interest, must be avoided at all times. We expect our business partners to notify us immediately if a situation arises which appears to involve a conflict of interest between the personal interests of those involved in the dealings and the interests of us or the business partner.

### Gifts and hospitality

The business partner shall respect and comply with practices regarding gifts and hospitality. Gifts and other favors to Epidemic Sound or any of Epidemic Sounds' employees, representatives, partners or anyone closely related can only be given or granted provided that they are modest, both with respect to value and frequency, and provided that the time and place are appropriate. Gifts or other favors shall not be offered or received in connection with contract bidding, evaluation or award.

### Fair competition and business practices

We compete freely and fairly and strongly believe that everyone benefits from competitive open markets. We expect our business partners to grow and build loyalty through delivering quality, not by engaging in unlawful anti-competitive practices. Business partners must never agree to, or engage in activities which, prevent or restrict competition in breach of applicable competition laws.

#### International business

Business partners shall conduct their business in compliance with all applicable international trade restrictions, such as sanctions and embargoes, as well as all relevant export control laws and regulations. They must ensure to never engage with, nor itself be designated as, a sanctioned party or sell, or in any other way make available, our products and services to a comprehensively sanctioned country or territory or a sanctioned party.

### Money laundering

Business partners shall comply with all applicable laws and regulations governing the prevention of money laundering and agree not to participate in any money laundering activities.

### Protecting data and information

### Personal data

We respect the fundamental right to privacy and take our responsibility and obligations to anyone entrusting us with information about them seriously. Business partners are responsible for complying with all applicable data protection laws and regulations, which among other things means that they are responsible to collect, use, and store personal data only as necessary for legitimate reasons and protect it from unauthorized access or other forms of unintended or unlawful disclosure, loss or misuse.

### Confidential information and intellectual property

Business partners that have been entrusted with confidential information or our intellectual property in the course of the business relationship are required to handle such responsibly, and shall in particular protect it from improper disclosure, theft or misuse at all times.



### Outro

Epidemic Sound will measure and verify compliance with this policy through various methods, including but not limited to ongoing monitoring, and audit conducted by Epidemic Sound or a third party on behalf of Epidemic Sound. We expect our business partners to, upon reasonable notice, provide us with documentation to verify compliance with this code.

If a business partner fails to meet our expectations as set out in this code, we will encourage the business partner to take action for improvement. Significant deviations or repeated unwillingness to make improvements, however, may jeopardize its relationship with us.

Business partners are required to promptly raise concerns of suspected non-compliance with applicable criminal laws and regulations, or with this code. Where allowed under applicable law, concerns may be reported through our external reporting platform available via

https://lantero.report/epidemicsound.

Business partners shall ensure the confidentiality and protection of whistleblowers by prohibiting any form of retaliation against any individual who, in good faith, brings concerns of non-compliance with this code or laws and regulations to your and our attention.

Now, join us on our mission to soundtrack the world.

