

Bonnierförlagen's Business Partners Code of Conduct

Introduction

Bonnierförlagen AB, reg. no 556023-8445, strive to within our area of competence be an active part of society and help take responsibility for sustainable development. We collaborate with initiatives that promote the joy and desire to read for every individual, with inclusivity, for a richer diversity at Bonnierförlagen AB, and to care for and protect the environment.

To achieve these goals, we need to collaborate with our business partners, and that is why we have adopted this Supplier Code of Conduct, which we expect all business partners, as well as ourselves, to comply with.

The Code of Conduct is an agreement between Bonnierförlagen AB, including the publishing houses within the publishing group that is Bonnierförlagen AB (hereafter referred to as "Bonnierförlagen", "we", "us", etc.) and business partners (hereafter referred to as "partner"/"partners"). This Code of Conduct applies even if an issue at hand is caused by a third party, including but not limited to, the partner's subcontractors or in turn their subcontractors. Therefore, we expect that our partners collaborate with such parties to reach an outcome that is in line with this Code of Conduct. When the term "partner"/"partners" is used in this Code of Conduct it also refers to possible third parties.

Our expectation is that our partners read, understand and maintain this Code of Conduct, and when necessary asks their contact at Bonnierförlagen for clarifications.

Basis for the Code of Conduct

Our Code of Conduct is based on the following declarations:

- The UN's Universal Declaration of Human Rights
- The Ten Principles of the UN Global Compact
- Ethical Trading Initiatives (ETI) Base Code
- International Labour Organizations (ILO) conventions

Whenever one of these declarations is amended, the latest version shall act as the foundation of our Code of Conduct, even if the text in our Code of Conduct has not been updated.

Scope of the Code of Conduct

We expect that our Code of Conduct is maintained and complied with by all partners of Bonnierförlagen.

Legislation and the Code of Conduct

We comply with local laws and regulations within the jurisdictions where we operate, and this Code of Conduct should be viewed as the lowest acceptable level. If other laws, regulations and rules – local, national or international – stipulates higher obligations than what is stipulated in this Code of Conduct, the higher obligations shall apply.

In case of conflict between this Code of Conduct and local, national, or international laws and regulations, the laws or regulations shall prevail.

In the event neither the law, other regulations or the Code of Conduct provide any guidance, the principles within UN's Global Compact shall apply.

Our Code of Conduct in brief

At Bonnierförlagen we expect of ourselves and our partners that...

... always comply with applicable laws and regulations.

... never actively engage with criminal activity or actively or passively support terrorism.

... never offer or accept bribes or other unwarranted benefits.

... ensure that human rights as defined by the United Nations are upheld for every employee.

... ensure that that every employee has a safe working environment.

... pay every employee a fair wage, on time, and in full.

... never use child labor.

... apply a zero tolerance policy for explicit and implicit discrimination and harassment, for whatever reason, including, but not limited to, discrimination or harassment based on ethnicity, country of heritage, caste, religion or other belief system, disabilities, gender, transgender identity or expression, sexual orientation, marital or parental status, trade union membership, political opinion, age or social class.

... strive to reduce environmental impact and recycle whenever possible.

... to the greatest possible extent and within the law framework act in a way that promotes democracy, freedom of speech and press.

General obligations

This Code of Conduct defines a lowest acceptable level which we expect all partners to Bonnierförlagen to live up to. An essential expectation is to never, actively or passively, engage with criminal activities or organizations, which includes, but is not limited to, collaborations that limits competition in an illegal way, terrorism, financial support of terrorism and other crimes connected to terrorism, money laundering, corruption, child labor, and other forms of trafficking.

We further expect of our partners that they follow all laws, regulations and generally accepted industry standards that apply. In case of conflict between this Code of Conduct and applicable laws, regulations or generally accepted industry standards the latter should always be followed. We then ask to immediately be informed thereof.

Promotion of democratic principles

At Bonnierförlagen we strive to promote democratic principles across the world. Therefore, we expect our partners to, whenever possible within legal limits, act in a way that promotes democratic principles such as freedom of speech and press.

Business integrity

We do not accept the use of bribes or corruption of any kind. This includes to offer, ask for, provide or accept, directly or indirectly, any form of unwarranted benefits for personal gain, unless it is within the limits of generally accepted business practice. Generally accepted business practice includes reasonable levels of representation and minor gifts within the framework of regular business. Unwarranted benefits include, but is not limited to:

- Gifts and presents
- Travel and housing
- Use of property or equipment
- Assigned contracts
- Job offers or work placements
- Gifts to charity or political purposes
- Services or benefits for family and friends

Business decisions should always be made with the company's best interest in mind and personal relations or considerations should never affect Bonnierförlagen's or our partners' decision making.

Protection of personal data

Correct processing of personal data of residents of the EU and the countries listed below demands compliance with the GDPR as of May 2018. Under the GDPR, everyone who collects personal data needs to follow specific rules for the processing of such information. This includes all steps of the processing, such as collection, processing, protection and retention of personal data. Further, all persons for which personal data has been collected, are to be informed of how their personal data is collected, how it is stored and the security related to the storing of their personal data, how it is updated and deleted, and how it is used. Failure to comply with the GDPR can result in substantive fines. Additionally, companies should be prepared to, if necessary, demonstrate to authorities how personal data is processed.

All partners that process personal data of residents within EU, Iceland, Liechtenstein, Norway, Switzerland, regardless if the partners' location is physically located within the EU, Iceland, Liechtenstein, Norway or Switzerland or not, have to comply with GDPR.

Human rights

All employees have the right to fundamental human rights in accordance with the United Nation's Declaration of Human rights, and every employee shall be treated with respect and dignity.

Harassment and discrimination

At Bonnierförlagen we have a zero tolerance policy for discrimination and harassment, and we expect that our partners uphold the same policy. Zero tolerance is applicable for both active discrimination and harassment as well as when it is passively accepted.

Discrimination includes, but is not limited to, discrimination in hiring, compensation, accessibility to training, promotion, termination or retirement, no matter the cause, including but not limited to ethnicity, country of heritage, caste, religion or other belief system, disabilities, gender, transgender identity or expression, sexual orientation, marital or parental status, trade union membership, political affiliation, age and social class.

Harassment includes, but is not limited to, sexual, physical, mental and verbal harassment, or threats of the above.

We encourage our partners to implement an anti-harassment and discrimination policy to ensure that employees are protected against harassment, bullying and discrimination.

Child labor

Child labor is not permitted. We define child labor in accordance with ILO (ILO's convention number 138), which means that children below the lowest acceptable age for labor in accordance with local law or age 15 (or age 14 as an exception in certain developing countries), depending on which is higher, should not be used as labor force.

Fair working conditions

All employees have the right to a written contract in a language that they understand, in which the terms of employment are specified.

All labor shall be voluntary, and the employee should be free to leave the workplace outside of working hours. No employee can be forced to continue its employment longer than it wishes, and every employee should have the right to terminate its employment with fair notice. Employees shall not, as a requirement for employment, be required to leave a deposition in the form of for example money, valuables, or original documents of identity.

We accept no form of physical punishment or forced labor.

There shall exist a transparent and functional way for employees to convey reasonable workplace concerns.

Working hours

Working hours shall follow local laws and regulations and should, with exceptions for overtime, be defined in contract.

Compensation and benefits

All employees shall receive written and comprehensive information regarding salary prior to the start of employment, and specifically regarding the salary for each respective period associated with when the salary is paid. Salary deductions as a disciplinary action is unacceptable and no deductions are allowed that are not prescribed by local laws and regulations or explicitly accepted by the employee. All disciplinary actions are to be registered.

In the absence of law, a fair wage for the performed labor shall be paid. Salaries are paid directly to the employee, regularly and on time.

All employees have the right to regular paid vacation.

Workplace environment

The workplace environment shall be equipped in an appropriate manner with access to clean drinking water, hygienic facilities and sufficient lighting, ventilation and temperature. All employees shall be allowed to perform basic needs and have breaks for meals. If lodging is provided it shall be clean, safe, and meet the basic needs of the employees.

Health and safety

Action shall be taken to prevent accidents and health-related risks, for example by minimizing risks within the workplace environment and provide appropriate safety equipment. Employees shall be informed of possible health and safety risks.

All employees shall be qualified to perform their duties and attend necessary training regarding both work tasks and possible necessary safety equipment.

All buildings shall be inspected and approved by fire officials, in addition to being equipped with up-to-date fire and safety equipment which is checked and tested regularly.

We encourage our partners to have a documented evacuation process visible in the workplace for possible emergencies and to ensure that all employees are trained within emergency evacuation.

Workplace accidents, illnesses and incidents shall be monitored, and risks identified and minimized as quickly as possible. If a specific risk is identified, action shall be taken towards minimizing the risk for exposure as soon as is possible.

First aid equipment shall always be readily available.

Social protection

All employees have the right for sick leave and parental leave with benefits in accordance to appropriate laws and regulation. As a result of pregnancy or illness the employee shall not suffer any negative consequences or termination of employment.

Freedom of association

All employees have the right to create or join any trade union, negotiate collectively and calmly and peacefully demonstrate and strike without any negative consequence. When this right is limited by law, suppliers are to whenever possible within the limits of the law support the development of alternative way for independent and free organizing and negotiation.

Trade union representatives are not be discriminated against and they are free to complete their representative duties in the workplace.

Reporting violations

It is the responsibility of our partners to ensure that the contents and the spirit of this Code of Conduct, when relevant and appropriate, is communicated, understood and implemented within their organizations and to encourage employees to report behaviors that violate the Code of Conduct.

If an employee is informed of, or suspects, any activity that may be a violation of the Code of Conduct, it is that individual's responsibility to report it. We recommend reporting one time too many, rather than one time too little.

Suspicious of violations shall first and foremost be reported to your contact at Bonnierförlagen. If you are unsure whom this is or for some reason wish to use a different channel, you can also report anonymously by visiting <https://report.whistleb.com/sv/bonnier>. Reports sent through the latter channel is handled by an independent law firm to ensure anonymity.