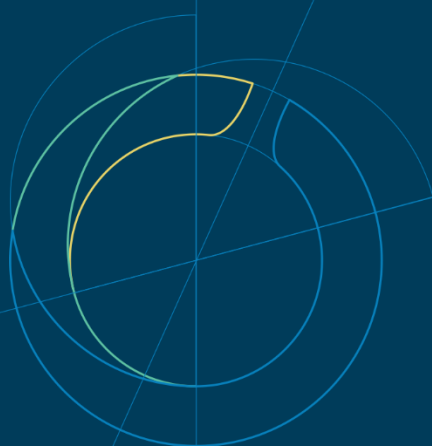




**Corporate Social Responsibility  
(CSR) Policy for Adform  
3 April, 2018**



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## 1. Introduction to Corporate Social Responsibility (CSR) in Adform

In a world of persistent growth, corporate social responsibility (CSR) is indisputably an important aspect of running a successful business. In Adform A/S and throughout our subsidiaries globally, our sense of responsibility is reflected in how we run our business.

While focusing on running a constantly growing company, we also do business with corporate social responsibility and environmental awareness in mind. This corporate social responsibility (CSR) policy for Adform A/S and its global subsidiaries (the “**CSR Policy**”) is rooted in our company values, which includes conducting business in a transparent and open way, promoting equal career opportunities, as well as involvement in initiatives that help reduce our environmental footprint.

Our CSR Policy applies to all Adform employees, directors, officers, consultants, agents, subsidiaries and our board of directors. We expect our partners and other stakeholders to share the same standards for sound and responsible behavior.

This CSR Policy is made to cover Adform A/S’s obligations, as per the the Danish Financial Statements Act § 99a for the financial year 2017. This CSR Policy is an integral part of the management report in the Adform’s Annual Report for 2017.

## 2. Business Ethics

Our CSR Policy is connected to and reflected in our values and business objective of conducting business in a transparent, open, and ethical manner. Mutual commitment by our board of directors, directors, and employees ensures that these principles are entrenched in our daily work and activities.

In Adform, we are accountable for the financial, environmental, and social performance of the business, and throughout the company, we strive to act accordingly.

Our business ethics are important in protecting Adform from any form of malpractice and unethical behavior which may undermine our business integrity, our core values, and ultimately affect the long-term success of the company. Among other things, we are committed to:

- Provide a safe and healthy work environment for our employees;
- Comply with local legislation and labor laws;
- Prohibit corruption, bribery, or other fraudulent behavior by any means, as evidenced via our internal code of business conduct, whistleblower policy, and anti-bribery policy;
- Prevent any kind of discrimination against current and potential employees or partners.

Amongst others, our actions and results for 2017 were:

- At the beginning of 2017, we set a goal of having a healthier work environment for 50% of our employees. By 31 December 2017 we had met that goal by offering 60% of our employee's access to a spine exercise and yoga classes in our biggest office. Further we offered a new insurance covering wellness treatments for our employees in Lithuania.
- At the beginning of 2017, we had the goal of preventing fraudulent behavior around the generation of invalid traffic. By 31 December 2017, we had implemented an invalid traffic policy prohibiting all employees from any kind of participation in invalid traffic generation either directly or indirectly. We met the initial goal of having 90 percent of our current employees agreeing to and signing with 100 percent of new employees signing this policy stating that actions that violate our rules are impermissible and will not be tolerated by Adform.

### 3. Whistleblower policy

An important aspect of our business ethics is to promote openness. For this, we have established a whistleblower policy to enable employees and management to pass on information in a secure and confidential manner within the scope of the whistleblower policy.

To emphasize the focus on transparency, we allow for investigation of improprieties before they potentially disrupt or harm the business and our operations in any way.

Reports or queries about breach of any policy are sent to an independently appointed law firm, who acts as our gatekeeper. We are committed to ensuring that reports and queries can be passed on in an anonymous and confidential manner with a non-retaliation process setup for all reports sent in good faith.

### 4. Human Rights

Our attitude towards human rights is rooted in our company values of being transparent, open, and caring. Since people are the main driving force of the organization, we have a fundamental commitment to respect our employees and protect their universal human rights.

We are committed to complying with the principles of the UN Global Compact, and we hence respect fundamental human rights accordingly. A link to the UN Global Compact can be found here: <https://www.unglobalcompact.org/>.

We are committed to ensuring that our high standards for human rights are held across our value chain and applies to not only employees, management, and our board of directors, but also to our stakeholders with whom we conduct business.

As part of our CSR Policy, we focus on strengthening and supporting the local communities around our offices. The effort is initially focused around our offices with a significant amount of employees. As an example, we are part of the *Mentor Lithuania*<sup>1</sup> project. "Mentor" is a leading NGO working globally to prevent drug abuse. We sponsor the program and submit mentors to work with the assigned teenagers. At the beginning of 2017, we set a goal of having 4 employees in Lithuania act as mentors. By 31 December 2017, we had exceeded this goal by having 7 employees act as mentors.

### 5. Diversity

With business operations in 19 countries worldwide<sup>2</sup>, we aim at providing a diverse and supportive work environment. We do this by aiming to attract a broad pool of talent and to stay competitive in our markets by engaging creative and highly qualified employees.

Any kind of discrimination based on gender, age, race, nationality, sexual orientation, religion, or any other characteristic violates our company values and is in direct conflict with the approach to which we want to achieve our corporate goals. All decisions concerning the career of individual employees or potential employment are based solely on the assessment of the individual's qualifications, cultural fit, and the overall business needs.

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<sup>1</sup> <http://mentor.lt/?lang=en>

<sup>2</sup> As per 31 March 2018.

Our diversity approach encourages and ensures that both male and female candidates are considered in the recruitment process for managerial positions as well as for positions on our board of directors. We will in our annual reports and/or our diversity policy report on our diversity.

## 6. People

Our strength lies within our people. The people aspect in this CSR Policy originates from our attitude towards fundamental human rights, our diversity policy, and our company values.

We are committed to running a growing business, while at the same time improving the well-being of our employees. The development of our employees' competencies, satisfaction, and safety is, therefore, an important item for us.

Amongst other things, we work with the following items:

- We regularly conduct employee engagement surveys in order to check on the well-being of our employees and to enable us to retain talents and ensure high levels of employee satisfaction.
- We use exit interviews to explore the reasons behind why employees leave the company.

Based on the feedback from our employees, we have identified three focus areas for retaining our talents:

- Increasing job satisfaction through transparent roles and responsibilities in the organization;
- Overall improvement of company environment and social atmosphere; and
- Rewarding and recognizing outstanding performances (e.g., via employee awards, etc.).

### 6.1 People Initiatives

As part of our strategy for retaining talents, we started a number of new initiatives in 2017, such as:

- The introduction of a *Learning & Development (L&D) process*. The purpose of the process is to manage our employees' continuous learning and development in a transparent and systematic way, to invest more in growing our people competencies, to optimize the ways in which we facilitate learning and development, to increase internal knowledge sharing, and to heighten employee engagement. At the beginning of 2017, we set a goal to increase access to learning & development for our employees. By 31 December 31, 2017, we met our goal and secured an EU funding in an amount of 400,000 EUR, which can be used to develop our employees' competencies over the next 4 years.
- The *Career Mapping project*. The core focus of the project is to align roles and titles across the organization and to make sure that each employee has a clear understanding of the expectations for her/his role and what is required to advance in her/his career. At the beginning of 2017, we set a goal to have a job evaluation for each position to ensure equality and more transparency in the way we hire, promote and develop our employees. By 31 December 2017, we had met our goal of evaluating all 150 positions using the globally renowned Willis Towers Watson leveling system.
- Updating and reviewing the *Talent Acquisition and Onboarding processes*. The purpose of this update was to ensure that we hire best-in-class people who can relate to the 'Adform DNA' (our core company values), and likewise to prepare our employees to perform effectively in their jobs, learn about the company, and ensure the best code of conduct. At the beginning of 2017, we set a twofold goal to 1) increase the number of employees who have central onboarding training from 75 percent to 90 percent; 2) make the training more efficient and environmentally friendly by introducing

5 new e-learning modules and reducing the number of in-person training whereby reducing the travel required for trainers. By 31 December 2017, we had met our goal and had reduced the number of training from monthly to quarterly and introduced 8 e-learning modules.

- The introduction of Leadership training and in particular the *New Leaders program* where we equip leaders to have a strong leadership foundation (feedback, communication, decision making, recruitment, trust, etc.) helps Adform's leaders identify their individual strengths, network with leaders across our global offices, and prepare them to lead by following Adform's leadership principles. Our goal for 2017 was to have 90% of our leaders in at least one leadership development session. By 31 December 2017, we met our goal as 95% of our leaders had attended at least one in-person leadership session. As an additional benefit, of the leaders who attended, 97% indicated that they felt more equipped to do their job following the training.

## 6.2 Supporting the local community

As part of our CSR Policy, we also focus on strengthening and supporting the local communities around our offices. The effort is initially focused around our offices with a significant amount of employees. Among others, we can mention:

- We are a part of the Lithuanian government's initiative called *Work in Lithuania*<sup>3</sup> that was established to attract Lithuanian specialists living and working outside Lithuania and inspire them to return home;
- We have a close partnership with *Invest Lithuania*<sup>4</sup> where we share knowledge and aid companies exploring Lithuania as a potential market for their technical delivery service centers;
- Adform employees participate in the *Children Dream project* fulfilling various wishes of kids in Lithuania;
- We have a partnership with various technology universities and gymnasiums in Lithuania. Amongst other things, we introduced an "Adform class" in one of the best Lithuanian technology gymnasiums to engage pupils with an interest in mathematics and informatics.

## 7. Environment

In Adform, we believe that the positive impact on the environment is not only achieved through larger initiatives but also through daily acts of consciousness involving every employee and stakeholder within the company. We aim to globally reduce energy consumption and emissions to minimize our footprint on the environment.

Numerous environmental-friendly initiatives have been launched across our global offices:

- We select datacenters with care, and we ensure that our appointed data centers follow our policy related to sustainable energy and waste management;
- Our Vilnius office (where 418 out of 794 employees worked per 31 December 2017) is environmentally-friendly. We set the goal of having this office environmentally certified in 2017 and succeeded, since the building was certified by BRE Global Limited in requirements of Scheme Document SD123 with the score "Premium" on 7 June 2017;

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<sup>3</sup> <https://workinlithuania.lt/home-page/>

<sup>4</sup> <https://investlithuania.com/>

- We are committed to reducing waste through recycling and by purchasing recycled, recyclable or re-furbished products and materials whenever these alternatives are available, economical and suitable;
- At the beginning of 2017, we set a goal of having waste and recycling stations in our offices covering a minimum of 50 percent of our employees. By 31 December 2017, waste and recycling stations had been introduced in Lithuania, Poland, United Kingdom, Denmark and the Czech Republic, where a total of 70 percent of our employees work. Consequently, we met our goal.
- At the beginning of 2017, we set a goal of installing energy-efficient light-bulbs across our global offices. By 31 March 2018, we now have energy-efficient light-bulbs in all of our global offices.