

Corporate Social Responsibility Report

ADFORM A/S, CENTRAL BUSINESS REGISTER
(CVR) NO. 26 43 48 15

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This CSR Policy and Report is an integral part of the management report in Adform A/S's Annual Report for 2019.

This Corporate Social Responsibility Report (the "CSR Policy") constitutes the statutory statement of social responsibility, cf. section 99a of the Danish Financial Statements Act for the financial year 2019.

In the CSR Policy, Adform have aligned and combined the statutory requirements with Adform's company values, being (i) Open & Caring, (ii) An Ownership Mindset and (iii) Agile and Innovative

Adform's CSR Policy is applicable to all of Adform employees, directors, officers, consultants, agents, subsidiaries and our board of directors.

Similarly, we expect our partners and other stakeholders to share the same standards for sound and responsible behavior.

Adform's History and Business Model

Adform is an advertising technology company established in Copenhagen in 2002. The goal of the founders was to develop a software platform capable of automating the advertising industry. Adform consequently became early entrants in what is today referred to as the adtech industry.

Today, Adform's main business is to provide the software systems that buyers and sellers of digital display advertising use to automate their advertising processes.



The figure above illustrates a typical way of applying adtech products: When a consumer enters a publisher's website, the publisher registers an opportunity to sell ad inventory. Adtech products are then used to e.g. analyze the consumer profile, programmatically trade the ad inventory and ensure the right ad is displayed on

the publisher's website. This process is highly automated and happens within fractions of seconds. Adform's software platform consists of a number of products that each plays a role in the buying and selling of ad inventory.

Global Business Policies

Being a global company operating across many jurisdictions can potentially be a corruption risk as norms and what is considered ordinary business is not interpreted in the same way in all parts of the world.

In order to manage this risk, Adform has documented and implemented certain global policies and procedures to set out clear guidance to its employees.

One of the initiatives which the Adform took to address the complexity was at the beginning of 2017, where it was decided to formalize preventing fraudulent behavior around generation of invalid traffic via a policy. 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. During both 2018 and 2019, 100% of all new employees, as a part of their employment contract, signed an obligation to adhere to this policy, wherein it is stated that actions that violate these rules are impermissible and will not be tolerated by Adform.

Adform has various company policies, the first one being a **Code of Business Conduct**. The Code of Business Conduct sets forth common ground rules for how Adform wishes to run its business and treat all individuals. Examples hereof are rules around privacy and confidentiality, honest and fair dealings with business partners, health and safety, compliance with laws, diversity and non-discrimination etc.

Secondly, Adform has an **Anti-Bribery Policy**. The Anti-Bribery Policy describes how employees are to comply with all applicable laws, and set forth detailed rules around which actions are prohibited when it comes to examples like facilitation payments, hospitality and entertainment of current and prospective clients and business partners and limits on both expenses and receipt of gifts. This policy enables

Adform's employees to make the right decisions when faced with challenging situations.

In 2019, Adform updated its **Whistleblower Protection Policy**. The Whistleblower Protection Policy furthermore now allows external stakeholders to report, as described here.

An important aspect of Adform's business ethics is to promote openness. By having the Whistleblower Protection Policy in place, all stakeholders are offered a confidential and non-retaliatory environment where they can report items of concern (as allowed under applicable laws).

All reports or queries about breach of any policy are sent to an independently appointed law firm.

Adform is 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.

Per 31 December 2019 no complaints had been lodged via the via whistleblower scheme for the period January 1st 2019 to December 31st 2019.

Open & Caring

Diversity is about who you hire. Inclusion is about the respect and acceptance people feel.

DIVERSITY

Adform promotes a diverse and inclusive environment around hiring and promotion. In this respect, Adform has a **Gender Diversity Policy**, which can be found [here](#).

As stated therein, Adform will:

- Run an open and transparent recruitment process for both internal and external candidates;
- Annually monitor the development in diversity, including gender distribution;
- Increase the focus placed on career development for female leaders who have potential to move into senior leadership roles; and

- Raise awareness of unconscious bias during the sourcing and recruitment process, focusing on gender diversity.

INCLUSIVE CULTURE

Adform uses the framework made by [Gallup Analysis](#), where an inclusive culture is defined as:

1. Everyone treats everyone else with respect;
2. Managers appreciate the unique characteristics of everyone on their teams;
3. Leaders do what is right.

In support of creating an inclusive environment, Adform has had large number of employees complete the Gallup Strengths Assessment. As of February 2020, approximately 60% of Adform employees have completed the Gallup Strengths Assessment, which presents insights into who the employee is, as well as areas where he/she may excel. Adform believes that nothing feels more welcoming and inclusive than being valued for one's authentic identity and abilities.

By the end 2020 we want to ensure that 75% of the organization have completed the Strengths Assessment to spread a strengths-based culture across all global Adform offices.

HUMAN RIGHTS

Adform is fortunate to predominately operate in countries which generally have lower risk for human rights violations. Adform does have some operations in countries where human rights are not at the same level as in Denmark, where the company is registered and headquartered.

Adform is dedicated to ensuring its employees have similar human rights across all countries in which it operates and supports the right to free speech, unions, etc.

Adform continuously evaluates new suppliers in order to avoid agreements with suppliers that do not meet Adform's standards, among other things on human rights.

In 2019, there have been no situations where Adform has been forced to reject or interrupt cooperation with new or existing suppliers due to human rights violations.

In addition, Adform continuously ensure that it is not engaging in deals with people or companies which are under sanctions by the United Nations, EU and the USA.

SOCIAL RESPONSIBILITY

Adform believe in giving back in the places where we are able to make an impact in our local communities. Consequently, at Adform's annual company day across all Adform's offices, each and every individual in the business was asked to dedicate a working day to do some charity work which was deemed important in the local office. Examples hereof was that the employees in Denmark collected trash around the center of Copenhagen, in Lithuania, employees volunteered in various locations like a local dog shelter, an elderly center, and in a food bank and in Germany the employees volunteered in a community city farm for underprivileged children.

Further, Adform aspire towards positive cultural impact and promote the health of others. For this, Adform had a **Blood Donation Day** organized in its largest office in Vilnius in 2019, where 10% of all employees donated.

For the upcoming Christmas of 2020, Adform has decided to continue to give back to those in need, and have consequently decided to ask its employees to give back to society instead of having local office Christmas parties.

Adform and its employees further believe that contribution to those less fortunate is important. Consequently, a number of fundraisers took place in 2019, examples of which are:

- In Poland, seven Adform employees participated in a charity run for the Polish Empowering Children Foundation, where a total of 3550 PLN was collected;
- Adform participated in a cycling challenge for IT companies for eight weeks in the autumn of 2019, where 15% of the earnings from all tickets were donated to UNICEF to save children's lives, to defend their rights, and to help them fulfill their potential;
- In 2019 November, a "pie day" was organized in Adform's Vilnius office, where employees were invited to bake a pie and share with friends and colleagues. The employees donated money for each piece of pie and the

donated money were given to children in need; and

- In 2019 Adform participated in the "4 Ocean fundraiser", where some employees bought bracelets made from plastic gathered from the oceans. In total, 2,000 EUR was collected and donated to a clean ocean movement.

By raising money for various local organizations, there is a risk that the organizations receiving the funds are not spending a sufficient amount on the actual cause, but that the money might be used towards administration costs for the foundation etc. This is not something which Adform actively monitor. Adform consequently believe that the combination of assistance to local communities, combined with the facilitation of fundraisers, show that Adform take social responsibility seriously.

Ownership Mindset

Environment & Climate

Adform believes that a positive impact on the environment is not only achieved through larger initiatives but also through acts of consciousness in our day-to-day decisions. As a technology company, Adform's largest impact on the environment and the climate stems from the energy consumption from datacentres and offices worldwide. Adform's aims to globally reduce energy consumption and emissions to minimize its footprint on the environment.

We support the **Adform Environmental Policy** by having datacenters providers that share our values of safe, healthy and environmentally friendly operations. As such we expect that our datacenter providers have initiatives and policies established which include sustainable energy and energy consumption, so our CO2 footprint is reduced.

SMART USE OF THE PLANET'S RESOURCES

In 2019, our goal was for 50% of our offices to have energy-efficient lightbulbs, initiatives which limit the use of paper, and less usage of plastic for office events. In total, Adform succeeded herewith, as we reached a level of 55%. For 2020, Adform aims to implement similar practices, bringing this level up to 60% across all of its offices.

The major goal for 2020 is to form a dedicated working group with management sponsorship, to formulate a 3-year strategy and initiatives to reduce Adform's carbon footprint in a meaningful way.

Adform already encourages our offices to secure local accreditations of our facilities from an environmental perspective.

Examples include:

- Adform's Italian office is certified by For Green Certificate, which guarantees sustainable energy use and production of renewable energy; and
- Adform's largest office in Vilnius is BREEAM certified, which among others require that the office has a high energy class performance (Class A) and less CO2 consumption compared to conventional buildings. Further, the office in Vilnius is placing more plants in the office, to ensure a better humidity level for our employees.

- Woman Go Tech <https://www.womengotech.lt/> in Lithuania;
- KTU University in Kaunas, Lithuania; and
- Shementor program in Sweden.

SUPPORTING TALENT IN TECH

Promoting young talents in the tech industry is something which Adform believe is important. As examples hereof, in 2019 Adform:

- Sponsored a Lithuanian Informatic Olympics, where employees volunteered their time and Adform supported young talents with prizes;
- Adform employees volunteer in the Vilnius Coding School in Lithuania;
- Sponsored and organized >15 meetups for talent in the tech community in Poland & Lithuania; and
- Hosted five excursions for School Kids and Students to Adform's offices.

Agile & Innovative

Talent in Tech Initiatives, Education

MENTORING

Adform believes in leading by example and therefore we believe in mentoring. An effort is taking place internally where various leaders across the organization spend time to tutor and mentor colleagues.

As of February 2019, Adform had 16 mentors and 21 mentees. During 2019, the goal was to increase this number with 5 additional mentors, thereby creating a bigger impact. During 2019, Adform did not succeed in reaching the goal, as Adform as of March 2020, Adform has 13 designated mentors and 14 mentees. For 2020, Adform aim to return to the level from February 2019.

In addition, a number of Adform employees spend time on external mentoring efforts connected to Adform. Examples hereof include: