

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 2020.

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 2020.

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.

In 2021, Adform will review its purpose and values to reflect Adform's development and make Adform and its employee ready for the future.

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

Similarly, Adform 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 founder's goal was to develop a software platform capable of automating the advertising industry.

Today, Adform's main business is to provide the software systems that buyers and sellers of digital display advertising use to transact ad inventory and 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 play 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 have been in place since 2017, is to ensure that a formal approach is in place to prevent fraudulent online behavior including generation of invalid traffic. By 31 December 2017, Adform had implemented an **invalid traffic policy** prohibiting all employees from any kind of participation in invalid traffic generation either directly or indirectly. Since then, 100% of all new employees, as a part of their employment contract, has 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 company policies are updated annually, last time in September 2020. One of the policies are Adform's **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 without any discrimination or threat of harassment of any sort. 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 related to e.g. gender, race, skin colour, beliefs, political convictions, sexual orientation or national, social or ethnic origins, disability or any other characteristics. The Code of Business Conduct also set forth rules reflecting how complaints can made to management and/or via

Adform's Whistleblower Protection Policy (as described below).

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.

Further, Adform has since August 2018 been operating a **Whistleblower Protection Policy**. The Whistleblower Protection Policy furthermore allows external stakeholders to report, as described [HERE](#).

An important aspect of Adform's business ethics is to promote openness and ensuring the stakeholders' and employees have a forum where 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 2020 no complaints had been lodged via the whistleblower scheme for the period January 1st 2020 to December 31st 2020.

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 a part of Adform's diversity, Adform is committed to:

- Run an open and transparent recruitment process for both internal and external candidates;
- Annually monitor the development in diversity, including gender distribution;
- Initiate an internal career development program for women called "Ladies of Adform", where the goals are to strengthening personal development and branding;
- Change recruitment and promotion process to include personality assessment and thereby reduce unconscious bias during the sourcing and recruitment process.

INCLUSIVE CULTURE

Adform defines an inclusive culture 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;
4. Everyone understands people's differences and personalities.

During 2021 Adform will take initiative to further strengthen the awareness of these aspects through Adform's Leadership Academy as part of the basic leadership education that will take place for all leaders, starting in Q2, 2021.

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.

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 2020, 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 takes steps to 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 believes in giving back in the places where we are able to make an impact in our local communities. Normally, Adform has an annual company day across all Adform's offices, where each and every individual in the business is asked to dedicate a working day to do some charity work which is deemed important in the local office. Due to the Covid-19 pandemic, the company day did not happen in 2020 in order for Adform to discourage the spread of the Covid-19 virus. However, several initiatives still took place, as possible with the pandemic.

In Germany, a donation to the local food bank happened ("Hamburger Tafel") at the end of the year on behalf of our clients.

In Lithuania employees have collected and prepared sets of children toys, clothes, books, office stationary and the packages were delivered to Vilnius Foster Home of Infants with impaired intellect "The Assistance Center "ŠEIMOS SLĒNIS". The children books were delivered to various libraries in the province and Advent Calendars – produced by local small family business – were bought and presented to Children Daycare Center "Duok ranką".

In Poland, employees have collected and prepared sets of children toys, clothes, books, office stationary and the packages were delivered to various Children Foster Homes and Orphanages. Adform Poland also created a desktop calendar for 2021 where 100% of the money collected will be donated to a person Nina, who suffers from Spinal Muscular Atrophy (SMA) and fights for gene therapy.

In Czech Republic, Adform employee specialists are initiating free consultancy to non-profits and provide them with free advertising for their campaigns. They also seek to support those small agencies that have suffered during decrease of business due to Covid-19 pandemic.

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 or otherwise.

Furthermore, in conjunction with Adform's to-be redefined purpose in 2021, Adform will investigate how its platform and core competency in digital marketing can be utilized to create a profile in the area of social responsibility, where Adform's platform is used to spread the core message for one or a small number of NGO's that fit Adform's purpose.

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 datacenters and offices worldwide. Adform's aims to globally reduce energy consumption and emissions to minimize its footprint on the environment.

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

SMART USE OF THE PLANET'S RESOURCES

In 2020, our goal was for 60% of our offices to have energy-efficient lightbulbs, initiatives which limit the use of paper, and less usage of plastic

for office events. Adform has stopped tracking this metric during 2020, as most of our leased premises are required to comply with energy efficiency requirements as per local regulation.

The major goal for 2020 was 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. With the outbreak of the Corona pandemic, management and the company at large, were forced to shift focus to stabilizing the business both from an operational and business continuity point. As a result the above mentioned working group initiative was unfortunately not initiated.

Due to Covid-19, the amount of business trips was significantly reduced. This has directly had a positive impact on Adform's carbon-foot print.

Adform encourages our local offices to ask our local landlords to obtain 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.

Agile & Innovative

Talent in Tech Initiatives, Education

MENTORING

Adform believes in leading by example and therefore Adform 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 20 2021, Adform had 20 mentors and over 30 mentees across various tracks within Product Management, Development & IT, Business Support, HR, etc.)

For 2021, Adform aims to have 20 mentors and mentees – primarily focused on helping talented young people understanding what their successful career path could be.

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

- Woman Go Tech <https://www.womengotech.lt/> in Lithuania;
- ISM University of Management & Economics
- KTU University in Kaunas, Lithuania;

SUPPORTING TALENT IN TECH

Promoting young talents in the tech industry is something which Adform believe is important. As examples hereof, in 2021 Adform:

- Will sponsor a UK initiative to support young people who fail to be ready for the digital age to kick-start a career in digital marketing by offering 6-month internships;
- Will continue to sponsor a Lithuanian Informatic Olympics, where employees volunteered their time and Adform support the young talents with prizes;
- Partnership with Vilnius Coding School - Adform employees do lectures to explain technical and IT market features for students;
- Sponsored and organized ~10 meetups for talents in the tech and IT communities in Poland & Lithuania

Further, many of the days where historically opened its office for children or student to show Adform's business, were not possible in 2020 due to the pandemic situation with Covid-19. Adform will aim to restart these in 2021, when the Covid-19 pandemic is under control.