



Corporate Social Responsibility Report

ADFORM A/S, CENTRAL BUSINESS REGISTER

(CVR) NO. 26 43 48 15

22 March 2022



This CSR Policy and Report is an integral part of the management report in Adform A/S's Annual Report for 2021.

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 2021.

In 2021, Adform has reviewed our purpose so that they reflect who we are today and our aspirations. This includes a set of seven (7) guiding principles reflecting what we see as good behaviour from all employees and the same seven (7) principles in a version for leaders. In these seven (7) principles our wish for diversity, equality and respect is stated clearly.

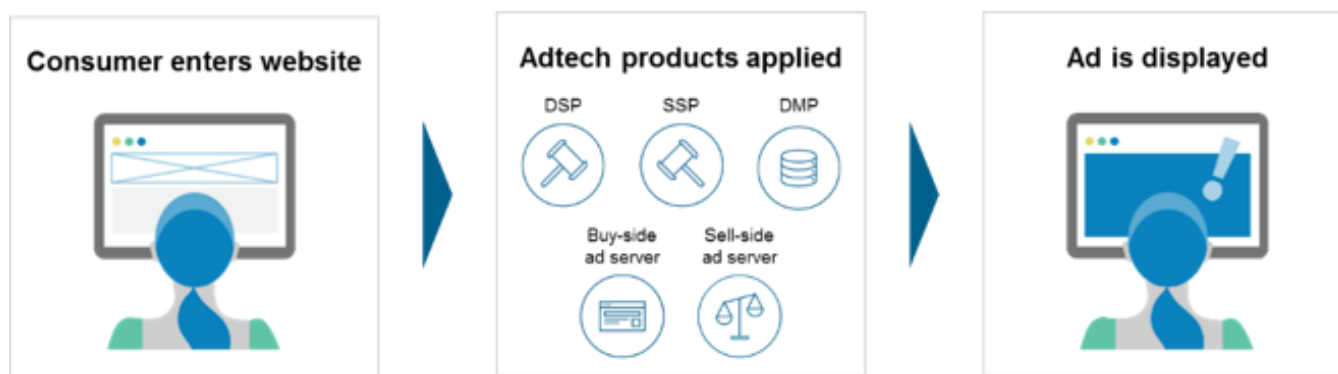
Adform's CSR Policy is applicable to all of Adform employees, directors, officers, consultants, agents, subsidiaries and our board of directors.

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 March 2022. 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**. In December 2021 Adform's whistleblower policy was updated to accommodate the recent changes in the EU directive in this regard, and subsequently the changes have been communicated to Adform's employees. A copy of the Whistleblower Protection Policy can be found [HERE](#). A link to the reporting portal can be found [HERE](#) which allow reporting for both employees and external parties.

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 2021, one compliant had been submitted, though without the whistleblower reporting portal, though without the whistleblower describing his/her claim in any way. Adform's external law firm followed up with the whistleblower multiple times requesting him/her to describe the potential matter, though without success as the whistleblower never replied.

Adform will in 2022 promote internal training related to its Code of Business Conduct, its Anti-Bribery Policy and its Whistleblower Protection Policy, with the goal that all active employees during 2022 will take trainings about these important policies to ensure the topics addressed in the policies are clear to all employees. A similar process will also be established, to ensure that all new employees take the same training as a part of their onboarding.

Diversity, Equality and respect

Adform has seven (7) guiding principles to guide our behavior. Three of them are related to diversity, equality and respect:

Number 2 is **BEHAVE WITH DECENCY**. For us that means that we are respectful, fair, and act with integrity towards our clients, suppliers, and colleagues.

Number 4 is **CARE**. That means we are engaged and we engage others. We are motivated and we motivate others. We care and we take responsibility for the well-being of our colleagues. We nurture an informal and fun environment. Everyone has equal opportunity.

Number 5 is **We ARE TEAM PLAYERS**. Teamwork is based on trust and together we achieve more. We help each other in order to create better results and we understand that we are part of a team. "How can I help" is our mantra. We embrace diversity of opinions.

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;
- Continue career development program with special focus on women renamed to: "Practice Makes Unperfect" with the goals are to strengthening personal development and branding.
- Continue 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.

The awareness of these aspects are an integral part of Adform's Leadership Academy which is our basic leadership education for all leaders.

In 2021 we were proud to be ranked amongst top 100 in Europe by the Financial Times Annual Diversity Leaders Ranking.

In the Adtech industry there is in general a lack of diversity e.g. there is a significant lack of women in tech. Adform supports initiatives to change this long term – but this change might takes decades if not prioritized politically.

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 2021, 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, this company day did not happen in 2021 in order for Adform to discourage the spread of the Covid-19 virus. Plan for 2022 is to reignite 'Adformer's Day' after reviewing what will have the most significant impact.

However, several initiatives still took place, as possible with the pandemic.

In Lithuania we have helped with a Covid vaccination campaign with Vilnius municipality. At a "Cake Day" in the Lithuanian offices, money were collected and given to a shelter for puppies. Furthermore, Adform supported employees running in the Rimi Vilnius marathon.

In Poland, employees have helped a family in need. As a result of many unfavorable coincidences, the family has run into problems, which is why it functions on the poverty line. There are two talented teenage twins studying nursing at local university. Our intention was to support education of young family members providing a necessary. Adform employees have collected and prepared set of gifts including printer, 2 office chairs, medical books, hospital staff clothes and variety of cleaning products for the family. All the items were collected in Warsaw office and delivered to the family on Christmas Eve.

In Czech Republic, Adform supported a project which gives food to rescued animals. We negotiated for them free ad space on premium Czech publishers, created banners in the Adform studio for free and provided free ad serving.

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.

Adform purpose has been clearly defined in 2021. The purpose is to reduce complexity for modern marketers. This year we will investigate how this purpose and our core competency in digital marketing can be utilized in our Adformers day efforts.

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 our offices worldwide. Adform aims to globally reduce energy consumption and emissions to minimize its footprint on the environment. As of 2021, Adform offices use more than half of its resources coming from sustainable energy sources.

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 policies established which include sustainable energy and energy consumption, so our CO2 footprint is reduced. As of 2021, Adform's data centres use above 95% sustainable energy. When looking at potential new data centers, environmental impact and the environmental plan by such potential new providers is taken into consideration as a part of the selection process.

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.

Since the last CSR-report in 2021, Adform's offices in Stockholm (Sweden) and Helsinki (Finland) have switched to renewable energy.

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.
- Adform's office in Poland have a "certificate of excellence" which demonstrate low CO2 consumption compared to conventional buildings.

Initiatives to support talent in Tech and 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 7 2022, Adform had 20 mentors and over 30 mentees across various tracks within Product Management, Development & IT, Business Support, HR, etc.)

For 2022, 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 2022 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 Adform historically opened its office for children or students to show Adform's business, were not possible in 2021 due to the pandemic situation with Covid-19. Adform will aim to restart these in 2022, when the Covid-19 pandemic is under control.