



Vendor Code of Conduct

ADFORM A/S, CENTRAL BUSINESS REGISTER

(CVR) NO. 26 43 48 15

1 November 2022



Introduction

Being a global company, Adform A/S and its subsidiaries (“Adform”, the “Company”, “we”) always commit to the highest business standards and practices. This applies to the quality of our products and services, but at the same time we expect all our vendors to meet the same standards.

We are committed to conducting business in a legal, ethical and responsible way. Integrity and a respectful attitude – this is something which makes Adform unique in the ad tech industry, and this is a reputation we wish to retain. Apart from our employees, Adform expects that all external parties share the same values and spirit as are laid out in this Vendor Code of Conduct (the “Code”)

This Code sets out the principles, guidelines and expectations which should be followed by anyone engaged in the provision of services and products to Adform (“Vendor/s”).

The Code constitutes an integral part of Adform’s contracts with its Vendors and non-compliance with the Code may lead to the contractual termination. Therefore, Adform encourages all prospective Vendors to carefully review the Code before entering into any agreement with us.

Adform undertakes to regularly revise and update the terms of the Code to conform to recent global business and legal standards. The final version of the Code is subject to annual review by Adform’s Audit Committee.

The most recent version of the Code can always be found here: <https://site.adform.com/company/corporate-governance/vendor-code-of-conduct/>.

Legal compliance

Vendors are required to understand and comply with various laws, rules and regulations applicable to their business and territory.

Furthermore, Adform expects Vendors to keep all licenses and permits required to conduct the activities for which they have contracted with Adform. At the same time, a Vendor must ensure that a person signing an agreement with Adform on behalf of the Vendor has full power and authority to do so.

Human and labor rights

Adform sees human rights compliance as a core value. The Company adheres to respectful and fair behavior which is being actively developed within Adform’s corporate culture.

We believe that it is important to promote human rights values within the whole supply chain. Therefore, Vendors are expected to conduct their business in conformity with international labor and human rights standards by requiring their compliance from Vendors’ employees, directors, clients, partners and suppliers.

In particular, Vendors must ensure that Vendor, Vendor's affiliates and Vendors' suppliers and sub-suppliers:

1. Prohibit the use of forced, compulsory and slavery labor;
2. Prohibit the use of child labor and comply with minimum legal age requirements in the countries of employment;
3. Treat employees with respect and dignity and provide a workplace free from any form of discrimination, bullying and harassment;
4. Provide employees and contractors with adequate levels of occupational safety and health;
5. Comply with legal minimum wage requirements and provide mandated benefits in the countries of employment;
6. Respect employees' right to freedom of association and collective bargaining;
7. Provide its employees and stakeholders access to report any material concerns (e.g. via a whistleblower setup).

Business Ethics

Adform takes business ethics standards and principles seriously. Therefore, we have not only established internal policies such as a [code of business conduct and ethics policy](#) and an internal anti-bribery policy, but also implemented compulsory trainings on the above-mentioned guidelines. In addition, Adform operates an [external managed whistleblower protection policy](#), providing employees, contractors, directors and vendors with right to report any items subject to the whistleblower protection policy in a safe and confidential manner.

Vendors are expected to adhere to the following principles:

Anti-bribery and Anti-corruption

Refrain from engaging in corruption, bribery, inducement and/or any other similar activity with Adform, other companies, any officials or other parties;

Comply with all relevant laws, rules and regulations in regards to anti-bribery, anti-corruption, anti-money laundering, sanctions, counterterrorism and alike.

Gifts and gratuities

Not provide or promise to Adform's employees anything of value including, but not limited to money, entertainment, gifts, discounts and/or any other monetary advantage that may be treated as a bribe and would lead the recipient to violate relevant laws and Adform's policies. In case Vendor would like to express gratitude with anything of value, exceeding EUR 100, receipt of such should be approved by Adform's SVP, General Counsel or Adform's Chief Financial Officer.

Conflicts of interest

Recognize and refrain from engaging in situations where conflicts of interest can occur. In the given relationship between Vendor and Adform, a conflict of interest implies Vendor not being impartial while working with or on behalf of Adform. While it is not possible to describe every situation, Vendor (including its employees, directors and officers) must never use or attempt

to use their position with the Company to obtain personal benefits (including benefits for its employees, directors, officers and members of their families).

Fair trade practices and sanction control

Refrain from engaging in any abusive trade practices such as price fixing, abuse of a dominant position and other prohibited anti-competitive behavior defined as such by local, EU and international authorities and organizations.

Abide by all sanctions laws or trade embargoes adopted by the United Nations, the United States, the United Kingdom and the European Union.

Confidentiality

During the course of business, Vendor may have access to Adform's confidential information ('Received Information'). Vendors are required to:

1. Maintain Received Information as strictly confidential;
2. Not disclose confidential information to any third party unless such limited right is given by the agreement with Adform or stipulated by applicable law;
3. Share confidential information with Vendor's employees on a need-to-know basis only;
4. Implement and sustain processes to provide protection for confidential information with a degree of care no less than for Vendor's confidential information.

For the purpose of the Code, 'confidential information' shall mean any internal information received from Adform in the course of cooperation, including but not limited to non-public information regarding the Adform's business, financials, products, clients, prospects and agreements.

Data privacy and security management

Being a technology company, which delivers online advertising services for the world's largest websites and advertisers, Adform takes privacy very seriously. Therefore, we expect Vendors to:

1. Respect individual privacy rights as established by applicable privacy and data protection laws and regulations;
2. Collect, store, process and share all data provided by Adform solely for the intended business need;
3. Return and/or delete all data provided by Adform upon contractual termination; and
4. Report any security breaches to Adform without undue delay.

Adform's Information Security Management System (ISMS) is certified to ISO / IEC 27001 by independent auditors. We encourage Vendors to demonstrate a similar level of industry standards and practices in regard to security controls.

Environmental Responsibility

Adform is dedicated to reducing the environmental footprint of its business. Due to the nature of ad tech activities Adform's largest impact on the environment follows from energy consumption at data centers. In 2021, more than 95% of energy consumption in Adform's data centers came from sustainable energy sources.

Therefore, the Company expects Vendors not only to comply with minimum applicable environmental laws but also to establish additional initiatives that will create significant environmental improvements.

No employment relationship

By entering into contractual relations, both Vendor and Adform do not intend to create an employment relationship and therefore Vendor shall not represent themselves as Adform's permanent or temporary employees and/or agents.

Contact

In case Vendors wish to report or have any questions and comments on Adform's Vendor Code of Conduct, they should contact Adform's Legal department at legal@adform.com