

# Corporate Social Responsibility Policy

*The CSR policy has been prepared in Danish and English. The Danish text shall be the governing text for all purposes, and in case of any discrepancy the Danish wording shall be applicable.*

## 1. North Media's purpose, values and basic principles

North Media is a listed company providing platforms and channels for communication between businesses and consumers and for other volume products. Through our subsidiaries FK Distribution and SDR Svensk Direktreklam, we are in contact with the majority of all Danish households and almost half of all Swedish households every week, serving as a connecting link for businesses wishing to distribute local newspapers and leaflets to consumers' mailboxes. We operate web-based platforms for dissemination of digital advertising leaflets and for offering rental housing. We also develop digital access solutions for secured stairwells and private homes to be used by distribution companies and home care services. In short, our purpose is to deliver customers to our customers. We are committed to doing so by running an ethical business built on trust and focusing on enhancing our positive footprint on society.

North Media's business units are managed and run according to strong values that form the core of our policies, rules and business procedures. The Group considers corporate social responsibility an integral part of the individual business units' strategies and day-to-day operations.

One of North Media's basic principles is to demonstrate responsibility to our employees, society at large, our customers, suppliers and business partners. We also aim to demonstrate integrity, fairness and loyalty in any decision we make.

Our policies are consistent with internationally agreed minimum standards for responsible business conduct, the UN Guiding Principles (UNGP) and the OECD Guidelines for Multinational Enterprises.

## 2. North Media's approach to corporate social responsibility

Ever since North Media was founded in 1965, we have taken an interest in the communities in which we operate. We are committed to promoting the sustainable agenda through the products and services we offer as well as in our role as a market player, employer and corporate citizen.

Accordingly, North Media constantly focuses on complying with and promoting Danish and international rules and conventions and, through continuous control, optimisation, operationalisation, collaboration with suppliers and reporting, on promoting the sustainable agenda while at the same time enhancing our financial, social and environmental performance.

In addition to complying with legislation in all areas in which we operate, we strive to continuously identify, prevent and mitigate our risk of contributing to negative impacts either through our activities or as a result of our business relations. Regular controls and impact assessments form the basis of appropriate measures to prevent or mitigate the risks of negative impacts. We communicate how we address such impacts to relevant stakeholders. Should we cause or contribute to an actual negative impact, we will provide access to possible remediation for affected stakeholder groups and, where relevant, prevent or mitigate any recurring incidents.

We take a holistic approach to sustainability efforts across all Group companies, which all work actively to implement our sustainability strategy. Our sustainability efforts are centred on the following areas:

### *2.1. Society*

At North Media, we are committed to being a responsible contributor to the communities in which we operate, starting with the Danish society in which we are domiciled. Our companies create growth in society, including, and perhaps especially, local growth through our products and services. We are focused on creating a safer and easier day-to-day life for the Danish population. North Media plays a significant and positive role because many young people choose a spare-time job with us as their first job, delivering local newspapers and leaflets. Having job responsibilities gives young people the opportunity to develop strong work and life skills.

We play an active role in the communities in which we are engaged through our job offerings across the country, and we are focused on contributing to the further development of the Danish welfare society by being a responsible taxpayer. We have drafted a Tax Policy, which is available on our website.

### *2.2. Human rights*

We act in accordance with internationally declared labour and human rights standards, including the International Bill of Human Rights and the eight fundamental conventions of the International Labour Organization (ILO). Potentially affected stakeholders and our business associates may contact us at any time for information on our most recent human rights assessment, in which we describe how we prevent and mitigate the risks of negative impacts as an integral part of our annual sustainability due diligence.

We also respect the privacy of employees, business partners and customers and focus strongly on responsible data processing.

### *2.3. Climate and environment*

We work actively to minimise any direct or indirect adverse impact on the climate and the environment of our own operations (defined as Scope 1 and Scope 2 in the Green House Gas (GHG) Protocol) or our purchases of products and services (Scope 3 of the GHG Protocol). We are committed to reducing our resource consumption, taking a responsible approach to waste handling and contributing to a circular economy. Sustainable innovation forms part of our development of products and services, and we aim to contribute to a sustainable transition of society as set out in international climate and environment agreements.

### *2.4. Ethical business operations*

We are focused on running an ethical business built on trust. We do not tolerate any form of corruption or bribery, and we make clear demands on our employees and business associates in terms of ethical business operations.

### *2.5. Employees*

We are committed to providing a healthy, stimulating and safe working environment for all our employees. We have a particular focus on ensuring that young distributors, non-ethnic Danes and other groups on the edge of the labour market have a positive experience when they enter the Danish labour market.

We offer a diversified workplace in which everyone is seen as equal regardless of gender, age, ethnicity, nationality, sexuality, race, disability, marital status, etc., and we do not tolerate discrimination. We focus on the skills and attitudes of the individual. Our diversity targets are defined in our Diversity Policy, which is available on our website.

We are also focused on safety and general labour rights, and we do not tolerate forced labour child labour (as defined by the ILO) or modern slavery.

### *2.6. What we expect of our business associates*

We expect all our business associates to comply with the globally agreed minimum standard of responsible business conduct. As a minimum requirement, our business associates must implement the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises. In other words, they must commit to addressing their risks of causing or contributing to negative impacts with regard to human rights, the environment and corruption and handling any actual impacts, sharing information on their performance and requiring the same of their own business associates. Any knowledge of severe negative impacts that our business associates may cause, contribute to or be involved in must immediately be reported to North Media's Group Executive Board. More elaborate information on our expectations of business associates is provided in North Media's Code of Conduct for Business Suppliers.

### *2.7. Reporting*

We document our key initiatives and results of our CSR efforts. For that purpose, we disclose relevant information in our annual report, which is also available on our website.

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This policy was approved by the Board of Directors of North Media A/S on 10 March 2025.