

CODE OF CONDUCT

2022



allente

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Message from the CEO

Allente Group AB and its subsidiaries is a customer-oriented, pan-Nordic entertainment distributor. Our values are Care, Dare and Share. Allente is committed to a responsible and sustainable business practice. We embrace diversity and promote equality and aim for our business to have a positive impact on our customers, our employees, our communities, our owners and the environment.

The entertainment business is constantly changing. New entertainment offers and ways of consuming are introduced and developed. Allente must adapt our business to the changing environment, to ensure that we create value for our customers. At the same time, we never compromise on ethics when doing business.

The Code of Conduct sets the foundation for how we do business in Allente, and what we expect from each other. It applies to and shall be signed off by all employees

in Allente. It applies to both permanent and temporary employees and contracted/hired workers, and to Board members. Further policies and guidelines may also apply according to the scope of those policies and guidelines.

If your line manager have any questions regarding the Code of Conduct, or if you are uncertain how to act, please contact you line manager, People & Culture, Compliance Officer or Legal.

Please read, understand and follow the Code of Conduct.

Always speak up if you have any concerns.

Jonas Gustafsson, CEO Allente

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What we stand for

We are a customer-oriented, pan-Nordic entertainment distributor

Our values are Care, Dare and Share. Allente aims for our business to have a positive impact on our customers, our employees, our communities, our owners and the environment.

This Code of Conduct clearly expresses our values. It is a practical guide on how we do (and don't do) business and helps us navigate ethical and legal situations we may face at work.

We are committed to conducting our business in full compliance with all applicable laws and regulations. We set a high standard for our conduct and never compromise on ethics when doing business.

Allente follows and respects internationally recognised human rights and labour rights everywhere and at all times, and sets clear standards in our policies.

Each of us is responsible for being familiar

with and following this code. We are responsible for seeking guidance when we need advice regarding its principles, when we want to raise concerns, or when we are unsure whether our conduct would be acceptable. See also Section 7 Raising concerns and Section 8 Ethics Checklist.

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Committing to our people and our world

Diversity, equality and non-discrimination.

We should all enjoy equal opportunities. When it comes to recruitment, promotion and training, what counts is competence, experience and performance. We believe that successful teams are diverse teams. We understand, respect and value each other's differences. We do not tolerate discrimination, bullying, victimization or any kind of harassment.

Fair working conditions. We provide a professional environment in line with universal human and labour rights standards, applicable laws, and agreements on working hours and compensation. Everyone in Allente is free to join associations or unions. Child labour or forced labour at any age, is not tolerated in our business or supply chain.

Health and safety. Allente provides a safe working environment that promotes physical and psycho-social well-being. Our offices and facilities comply with all

applicable health and safety regulations. Everyone should enjoy their job and have a healthy work-life balance.

Protecting our environment. Our planet is our home. Allente supports a precautionary and preventative approach to environmental challenges. We cooperate with our landlords with the aim of making our offices as environmentally sustainable as possible and encouraging solutions for recycling and reuse. We seek to reduce business travel wherever possible and promote and facilitate the use of digital meeting solutions.

If you have questions or concerns, contact your line manager or People & Culture. See also Section 7 Raising concerns.

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Protecting our assets

Protecting our assets safeguards our business. Having agreements with content providers that enable us to deliver great content to our customers, are amongst Allente's most obvious assets. We have also other important assets, such as our software, computer systems, equipment (including laptops and other IT equipment), intellectual property, strategy plans and data, as well as the Allente brand and logos. Every asset enables the success and sustainability of our business in some way. We are all responsible for protecting and using them correctly and in line with the guidelines for acceptable use of IT. We are careful about how we use our IT assets, about how we handle confidential information and about our responsibilities if we leave Allente.

Our IT assets. We only use Allente company e-mail, intranet and internet connectivity and devices for legitimate and authorised business purposes. Private use of your e-mail account must be kept at a

minimum level.

We do not access, display, download or share inappropriate content or information when using our IT environment. This applies to material that is illegal, offensive, harassing, racially or sexually discriminatory, or otherwise inconsistent with a professional and ethical environment. We are careful when opening attachments or URL links that are not related to our business. If sender or file type is unknown, the attachment or link should only be opened after confirmation from the sender, or otherwise be deleted unopened. Using personal software on a work PC or modifying our software is a security risk and requires prior approval of the IT department.

Confidential information. As part of our work, we may have access to information about Allente that is not available to other people within or outside the organisation. This can include financial data, business

plans, contracts, customer and supplier information. If the information is not public, it must be treated as confidential according to its sensitivity. We protect confidential information from improper use and do not share it – even with colleagues – unless authorised to do so.

Leaving Allente. If we move on, all Allente assets in our possession must be returned in line with instructions upon termination. Access to Allente systems will be discontinued. Confidential information remains confidential at all times.

If you have questions or concerns, contact your line manager or Allente security department (security@allente.tv).

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Doing business the right way

We never compromise on ethics when doing business.

Anti-corruption. Corruption or a bribe is not just cash in an envelope. It can be the provision of anything of value – including cash or equivalents, gifts, paid expenses, entertainment, kick-backs, favours or loans – in return for certain actions. We do not tolerate any form of corruption, bribery or inducement to act improperly. Everyone working for – and on behalf of – Allente is expressly prohibited from giving, offering or promising anything of value to influence business decisions or to gain an improper business advantage. The same goes for requesting, accepting or receiving a bribe. Nobody in Allente will ever face punishment of any kind for refusing to pay a bribe or for highlighting corruption – we expect honesty and integrity from each other and from our partners.

Conflict of interest. We avoid and eliminate conflict of interest. Examples of conflict of interest include maintaining external directorships or significant shareholdings

in suppliers, customers or competitors; employing family members or friends; or using a supplier in which a relative or close friend has a significant role or financial interest. We do not work – in any capacity – for another individual or entity in a way that could affect our ability to carry out our roles and responsibilities in Allente.

Fair competition. We compete vigorously but fairly. We are committed to free and open competition and we abide by relevant competition laws and regulations wherever we do business. We expect the same high standards from each other. We never agree or consort with a competitor to limit how we compete with one another. That means e.g. no price fixing; no agreements to split markets or customers; no bid-rigging arrangements and no exchange of competitively sensitive information with our competitors. We ensure that we have a legitimate reason if we meet or have relations with competitors, and always act with due caution in

such occasions. Competition law also prohibits the abuse of a dominant market position.

Doing business internationally. Most countries have adopted laws regulating international business activities. Some of these laws prohibit business dealings with specific sanctioned countries, companies or individuals. The rules may restrict transfer of assets, monetary payment or provision of services to these sanctioned countries or parties. To avoid breaching those rules, as well as to steer clear of other illegal practices such as money laundering, we must make sure that we know our business partners – including who owns or controls them, what business they do and where, and their reputation.

Representing Allente. In all business relevant settings, and wherever we are in the world, we always behave as ambassadors for Allente, and we act professionally and respect local cultures at all times.

Interacting with partners and suppliers.

We respect human rights and the interests of Allente's employees and third parties – and we only work with partners and suppliers who do the same. We ensure that current or prospective partners and suppliers are committed to ethical standards equivalent to our own.

If you have questions or concerns, contact your line manager, Compliance Officer or Legal.

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Handling information the right way

We respect the right to privacy. We keep reliable records and ensure accurate communications. And insider trading is always out.

Data Protection. Everybody has a fundamental right to privacy, and we respect this right at all times. We protect all personal data entrusted to us, and we comply with all data protection laws and regulations wherever we operate. We hold and process personal data about our employees and customers for administrative and commercial purposes. The definition of personal data is very wide and can include name, address, phone number, date of birth, national identification number, bank account information, IP address and device ID.

We only collect, access or process personal data that we need to conduct our business, and only for the purpose for which it is intended. We also ensure that the data is always kept secure.

Business information and communication. Our public communication and disclosure are always full, fair, timely and accurate. We ensure that all information that we submit to company records is complete and accurate. If asked (online or offline, in or out of the office) about Allente's views or statements by any external party, we pass the request to our Corporate Communications team, who coordinate the response on matters such as strategy, performance, news and opinions.

Insider trading. Both parent companies of Allente (Viaplay Group and Telenor Group) are listed companies. If we have access to information about our parent companies, or about a customer, partner or supplier, that is not available outside the company – and this is information that would be

likely to have a significant effect on said company's stock price if it was made public - then we do not share this information, conduct any transactions based on this information, suggest that anyone else conducts such transactions, or change any orders that have already been placed.

The same applies for information on Allente that would be likely to have a significant effect on either of our parents' stock price.

If you have questions or concerns, contact your line manager, Legal, Corporate Communications, Compliance Officer or Data Protection Officer.

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Raising concerns

A culture of openness. Allente promotes a culture of openness, responsibility and accountability. We expect you to tell us immediately if you believe a violation of the Code of Conduct, policies or applicable laws has taken place or will take place in the future, and we encourage our employees to raise their concerns. Doing so makes an essential contribution to the sustainability of our culture, and makes it possible to correct and remedy potential negative practices or behaviour as soon as possible. All concerns will be taken seriously and investigated appropriately. All managers are responsible for encouraging an open dialogue, and for supporting employees by addressing all concerns in a fair and unbiased manner. We want everyone to feel comfortable raising concerns without worrying about a negative reaction. Allente does not tolerate any kind of reprisals or retaliation against those who, in good faith, raise concerns against possible censurable matters. The same applies to employees who express their intention

to report a concern.

How to raise concerns. Allente encourages employees to raise concerns at the earliest possible stage. We have established routines for reporting and handling of concerns, ensuring that there are several safe ways to raise concerns in Allente. Concerns can be raised by using the Allente Reporting System, which provides for an independent and confidential reporting system, where you also can choose to report anonymously. You can raise concern directly to your line manager, alternatively to the Compliance Officer. You can also raise concerns to People & Culture, your line manager's manager, through the employee representative or personnel safety representative.

The Allente Reporting System and routines for reporting and handling of concerns are available on Allente Workplace and Allente Governance Sharepoint site.



Ethics checklist and contact information

Our Code is our compass.

You are responsible for familiarising yourself with the Code of Conduct – and for seeking guidance if you are unsure whether a course of action is the right one. The ethics checklist below is a helpful tool. In addition to this Code of Conduct, Allente has adopted policies providing further information about the areas covered by this code. The policies are available on Allente Workplace and Allente Governance Sharepoint site.

Ethics checklist

- Is it legal and does it comply with our Code of Conduct?
- Am I comfortable with it?
- How would it feel if it was shared with others?

If you have any questions regarding the Code of Conduct, or if you are uncertain how to act, please contact your line manager, People & Culture, Compliance Officer or Legal.

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