

MTG Supplier Code of Conduct

Introduction

Modern Times Group AB (“MTG”) is an international, mobile-first, gaming group that offers players all over the world a wide range of popular game franchises. Our mission is to build an international gaming village where entrepreneurs can come together to enjoy a thriving ecosystem of tech and knowledge, enabling them to accelerate their businesses.

Scope

We want to develop and keep strong business relationships with suppliers who are committed to ethical standards equivalent to our own. This Supplier Code of Conduct (“SCoC”) sets out the requirements and ambitions with which all companies providing products and/or services to any MTG company (“Suppliers”) are expected to comply. This includes the Suppliers’ employees, consultants and sub-contractors.

Commitments

We are committed to conducting our business in full compliance with all applicable laws and regulations. We expect the same commitment from our Suppliers. Stricter rules than those described in this Code may be in place in certain countries or business areas. Where multiple rules address the same subject and do not conflict with each other, the highest standard shall be applied.

This Code set out our commitment to international initiatives and standards such as the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the Fundamental Conventions of the International Labor Organization, the UN Universal Declaration of Human Rights and the European General Data Protection Regulation.

Suppliers’ general requirements

Suppliers are expected to establish environmental, social and governance management systems that reflect the nature and scope of their risks and opportunities. The Supplier shall work with the requirements put forth in the following section in their entire value chain.

Suppliers’ human and labor rights requirements

The Supplier shall adhere to all the international principles and standards regarding human and labor rights and data protection as listed in our commitment. Of these principles, we consider the below core to our SCoC:

Discrimination and harassment

- The Supplier recognize and commit to upholding the human rights of workers and treating them with the dignity and respect indicated by internationally recognized principles.
- The Supplier shall have fair hiring and employment practices to ensure there is no discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status.
- The Supplier shall not subject workers or potential workers to any medical or pregnancy tests that could be used in a discriminatory way.
- The Supplier shall not use any harsh or inhumane treatment, including sexual harassment or abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, nor is any such treatment to be threatened.

Data and information

- The Supplier shall respect individuals' right to privacy, and to handle personal data and confidential information responsibly.
- The Supplier shall comply with all applicable data protection laws and regulations when personal data and information are collected, stored, processed, or transferred.
- The Supplier shall protect confidential information from unauthorized disclosure or misuse.

Work conditions

- The Supplier shall not use any kind of forced, bonded or indentured labor, human trafficking or involuntary prison labor.
- The Supplier ensures all work is voluntary, and workers shall be free to leave upon reasonable notice.
- The Supplier upholds the effective abolition of child labor, i.e. no labor is performed by children or minors under the minimum age, in accordance with laws of the country, or under the age for completing compulsory education or the minimum age for employment in the country
- Workers under the age of 18 shall not perform hazardous work, or heavy work and may be restricted from night work out of consideration for their educational needs.

Labor conditions

- The Supplier shall ensure that working weeks are not to exceed the maximum hours set by local law.
- The Supplier shall compensate workers follow all applicable wage laws, including those relating to minimum wages, overtime and legally mandated benefits. Any disciplinary wage deductions are to conform to local law.
- The Supplier shall respect the right of workers to associate fairly and to communicate openly with management about working conditions without fear of reprisal, intimidation or harassment.
- The Supplier shall ensure that all workers have the right to join labor unions, seek representation and join workers' councils per local laws.
- The Supplier shall not penalize workers for lawful participation in labor organization activities.

Health and safety

- The Supplier shall ensure that workers are provided with a healthy and safe working environment following internationally recognized standards.
- The Supplier shall do their utmost to control hazards and take necessary precautionary measures against accidents and occupational risks.
- The Supplier shall ensure that workers receive adequate and regular health and safety training and education.
- The Supplier shall regularly identify occupational hazards affecting their staff and implement measures to mitigate the identified hazards to an acceptable level, at a minimum fully complying with all applicable laws and regulations.
- The Supplier must have clear procedures in place to ensure that emergency situations are dealt with in a way that minimizes harm to life, environment and property. For example, the Supplier must ensure that there is sufficient fire protection in place as well as the provision of personal protective equipment to employees at company cost.
- The Supplier must report all work-related accidents, investigate and preventative measures must be introduced by the Supplier.

Suppliers' environmental requirements

The Supplier shall adhere to all the international principles and standards regarding the environment as listed in our commitment. Of these principles, we consider the below core to our SCoC:

- The Supplier is to take a precautionary approach towards environmental and climate challenges.
- The Supplier strives to undertake initiatives to promote greater environmental responsibility and the development of environmentally friendly technologies.
- The Supplier takes suitable actions to monitor their energy use and take practical steps to reduce energy consumption and use renewable energy sources, where available at competitive prices.
- The Supplier strives to take practical steps to monitor, manage and minimize the greenhouse gas emissions caused by the supplier's operations.
- The Supplier is expected to monitor and manage emissions to air, water and soil as well as reduce generated waste. Whenever possible, operations byproducts should be reused and recycled.
- The Supplier continuously improves their environmental performance by identifying, assessing, and managing environmental risks and impacts throughout their value chain.
- The Supplier strives to carefully plan and manage their water consumption, treating and reusing the consumed water when possible.
- The Supplier should keep the use of hazardous chemicals to a minimum. Where hazardous chemicals must be used, the supplier shall ensure safe handling, storage, and disposal of the substances. All substances should be properly marked and substances that have been restricted or regulated by the European Union directives REACH and RoHS are to be respected.

Suppliers' anti-corruption requirements

The Supplier shall adhere to all the international principles and standards regarding anti-corruption and its preventive actions as listed in our commitment. Of these principles, we consider the below core to our SCoC:

- The Supplier has zero tolerance towards corruption, including but not limited to bribery, facilitation payments, extortion and fraud. MTG require all Suppliers to uphold the highest ethical standards and act with integrity when doing business
- The Supplier prohibits the offer or acceptance of business courtesies – gifts, hospitality, expenses or other benefits – if they could constitute, or appear to constitute an undue influence. Suppliers shall exercise increased caution and restraint when business courtesies involve public officials.
- The Supplier shall develop and implement an anti-corruption policy (this does not have to be a stand-alone policy but can be part of another policy), as well as internal control measures.
- The Supplier shall provide anti-corruption training to managers and to employees working in positions prone to corruption, such as procurement, sales, and financial transactions.
- The Supplier shall take measures to monitor and mitigate possible and actual conflicts of interest.
- The Supplier complies with all competition and anti-trust laws. This includes not enter discussions or agreements with competitors on price fixing or adjustments, market distortion, beneficiary services or other similar activities.
- The Supplier shall respect international sanctions that may be imposed on countries, entities or individuals, either multilaterally or unilaterally.

Governance and termination for cause

The supplier is encouraged to ask questions about any matter related to this Code, and to report any ethical concerns or suspected cases of non-compliance with this Code in MTG’s whistleblower system found at: <https://whistleblowersoftware.com/secure/MTG>.

To ensure compliance with the SCoC, the Supplier shall, upon request, participate in self-assessment process organized by MTG.

MTG, or a third party assigned by MTG, has the right to conduct reviews or audits on how the Supplier and Sub-suppliers fulfill the requirements set forth in the SCoC.

The Supplier agrees to cooperate during such reviews or audits. The Supplier shall ensure that MTG has a corresponding right to audit any of its sub-suppliers.

Breach of the Supplier Code of Conduct is considered material and may result in termination of agreement or co-operations with the Supplier.

Policy history and change information

Version	Revision Date	Change information
1	2019-05-20	Initial Code of Supplier Conduct
1.1	2020-12-09	Expanded sections on environmental responsibility and health & safety
1.2	2021-12-08	Editorial changes and clarifications