

ANTI-DISCRIMINATION & HARASSMENT POLICY

Introduction

This anti-discrimination and harassment policy explains how Modern Times Group MTG AB ("MTG") prevents discrimination and protect employees, customers and stakeholders from offensive and harmful behaviors. MTG does not tolerate any kind of discrimination, harassment, sexual harassment or bullying, whether occurring at work or outside the workplace in connection with work. This policy supports MTG's overall commitment to create an inclusive and welcoming workplace for all employees and other stakeholders that we meet in our daily operations.

Scope

This policy applies in full to all employees, agency workers, interns, job candidates and contractors of MTG. It also sets conduct and report handling standards in relation to visitors, customers and stakeholders of MTG.

Prohibited grounds of discrimination as defined by the Swedish Anti-Discrimination Act (Sw. ***Diskrimineringslag (2008:567)***):

- Gender
- Gender identity or expression
- Ethnicity
- Religion or religious belief
- Disability
- Sexual orientation
- Age

What is considered discrimination?

Under the Anti-Discrimination Act, discrimination can be either direct or indirect and entails a person being treated unfairly or worse than another person for reasons related to any of the prohibited grounds of discrimination. Harassment, sexual harassment, instructions to discriminate and failure to make reasonable accessibility adjustments to mitigate disadvantages caused by a disability are also forms of discrimination under the Discrimination Act.

This is not an exhaustive list, but here are some instances that may be considered discriminatory:

- Rejecting job candidates because of their gender, gender identity or expression
- Bypassing team members because of a protected characteristic (e.g., ethnicity), rather than on objective, job-related criteria

- Terminating a probationary employment because the employee is pregnant.

What is considered harassment?

Harassment is all unwanted conduct, verbal, non-verbal, or physical, which is associated with any of the prohibited grounds of discrimination, and that is intended to or has the effect of violating a person's dignity or creating a degrading, humiliating, hostile, or offensive environment for them. This is not an exhaustive list, but here are some instances that may be considered harassment:

- Offensive gestures
- Racist, sexist, homophobic or ageist jokes, texts, images or symbols
- Derogatory or ridiculing comments, such as comments on a person's ethnic heritage or religious beliefs
- Mocking, mimicking or belittling a person's disability
- Unjustified deprivation of work tasks

What is considered sexual harassment?

Sexual harassment is unwanted conduct, verbal, non-verbal, or physical, of a sexual nature that is intended to or has the effect of offending a person's dignity or 'creates an intimidating, hostile or offensive work environment for them.

Sexual harassment encompasses a wide range of conduct, with some examples being the following:

- Physical assaults of a sexual nature, such as rape, sexual battery, molestation or attempts to commit these assaults, and intentional physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, brushing against another employee's body or poking another employee's body.
- Unwelcome sexual advances, propositions or other sexual comments, such as sexually oriented gestures, noises, remarks, jokes, or comments about a person's sexuality or sexual experience.
- Preferential treatment or promises of preferential treatment to an employee for submitting to sexual conduct, including soliciting or attempting to solicit any employee to engage in sexual activity for compensation or reward.
- Subjecting, or threats of subjecting, an employee to unwelcome sexual attention or conduct or intentionally making the performance of the employee's job more difficult because of that employee's sex.
- Sexual or discriminatory displays or communications on any channels.

What is considered bullying?

Bullying is all conduct directed at one or more persons in an offensive manner. Bullying can be any verbal, non-verbal, physical or other conduct that can make a person feel upset, vulnerable, humiliated or

threatened, and that may lead to ill health, or the victim being excluded from the workplace community. This is not an exhaustive list, but here are some instances that may be considered bullying:

- Physical or psychological threats.
- Overbearing and intimidating levels of supervision.
- Inappropriate or derogatory remarks about someone's performance.
- Systematically ignoring an individual, for instance by not speaking or listening to them.

Actions to prevent discrimination

To ensure equal and fair treatment, MTG will investigate and assess whether there are any risks of discrimination, or other risks that may prevent fair and equal treatment at MTG. MTG will take appropriate and reasonable measures to mitigate any such risks and will duly assess any measures taken to ensure their effectiveness.

Furthermore, MTG:

- Uses inclusive language in job ads and include equal opportunity employer statements
- Sets formal job-related criteria to hire, promote and reward team members
- Offers compensation and benefits according to position, seniority, qualifications and performance, not protected characteristics
- Accommodates people with disabilities
- Requires managers to keep detailed records of their decisions concerning their team members and job candidates
- Conducts an annual assessment to identify any unjustified differences in remuneration or terms and conditions of employment for women and men working for MTG.

What to do in cases of discrimination, harassment or bullying

If you believe that you or any of your co-workers is being or has been discriminated against, harassed, sexually harassed or bullied, you are encouraged to report the conduct directly to your local HR (or your manager, or manager's manager) as soon as possible. They are responsible for hearing your claim, investigating the issue and determining punishment.

How MTG addresses discrimination, harassment and bullying reports

MTG will investigate all reports in a timely and confidential manner. The investigation will be carried out by a person with appropriate knowledge. When deemed necessary, MTG may appoint an external party to assist with the investigation. Details of the investigation, and the names of the person making the complaint and the person accused, will only be disclosed on a "need to know" basis. During the investigation, MTG will consider if any measures are necessary to manage any ongoing working relationship between the reporting person and the person or persons accused.

Once the investigation is complete, MTG will, where required or deemed appropriate, inform the reporting person of the result of the investigation. If it is deemed that discrimination, harassment, sexual harassment or bullying has taken place, MTG will take appropriate and reasonable measures to resolve and to prevent further issues and the matter will be dealt with as a case of possible misconduct or gross misconduct (and the person responsible may face consequences such as reassignment and/or termination, subject to Swedish law). Whether or not the report is upheld, MTG will consider how to best manage any ongoing working relationship between the reporting person and the person accused.

Employees who in good faith raise concerns, reports or participates in any investigation regarding discrimination, harassment, sexual harassment, or bullying must not suffer any form of retaliation or victimization as a result. MTG accepts no such retaliation or victimization, and anyone found to have retaliated against or victimized someone in this way will be subject to appropriate measures.

We should all strive to prevent and address discrimination and harassment. Be aware of your implicit biases and speak up whenever you or your colleagues are discriminated against. If you have any ideas on how MTG can ensure fairness and equality in the workplace, we are happy to hear them.

Policy history and change information

Version	Revision	Date Change information
1	2021-02 -11	Final draft of policy
1.1	2021-12-08	Minor editorial changes
1.2	2022 -12-08	Editorial changes and clarifications
1.3	2023 -12-08	Reviewed for relevance and clarity, no changes made
1.4	2024 -12-02	Reviewed for relevance and clarity, minor editorial changes made
1.5	2025 -12-04	Revisions to ensure complete alignment with legal requirements pursuant to, <i>inter alia</i> , the Swedish Anti - Discrimination Act.