# CONDÉ NAST

### **VENDOR & SUPPLIER CODE OF CONDUCT CONDE NAST**

At Condé Nast we understand our responsibility to our partners and our audiences to conduct business in a lawful and ethical way. This includes acting with honesty and fairness in all we do and, overall, treating one another with respect. It is core to our <u>values</u> and dedication to excellence.

This Vendor & Supplier Code applies to those who we work with directly and indirectly in conducting the company's activities, on our behalf including: employees, contributors, advertisers, vendors, suppliers and external organisations and agencies.

#### Scope

This Code applies to all Condé Nast suppliers, vendors, partners, contractors, contributors, licensees, freelancers and every member of your own supply chain. These standards supplement your legal obligations and any agreement between us.

This is about compliance with our values as an organisation but if there are local laws or regulations which are contrary to what is set out in here then that regulatory requirement will prevail.

# **Compliance with this Code**

This Code outlines the ethical and legal standards we expect from our suppliers. Please understand that the sections provided herein do not cover every compliance obligation. Suppliers are expected to adhere to all applicable local, national, and international laws and regulations. We take the matters described in this Code very seriously. We may require you to participate in monitoring or audits to demonstrate your compliance with this Code. If we have concerns that you are not meeting our standards, we expect you to collaborate to resolve any issues promptly. We reserve the right to cease working with you until the relevant concerns have been addressed.

Here are our Business Principles & Values:

### 1. Thriving in Our Workplace

At Condé Nast, we expect our business partners to value diversity of backgrounds, views and cultures, and believe in providing equal opportunity and treatment for everyone. We expect you to value people for their unique qualities, skills and contributions, regardless of their socio-economic status, culture, race, colour, religion, ethnicity, national origin, physical and mental ability, ancestry, age, disability, sex, sexual orientation and gender identity or expression, or any other characteristics. You are expected to promote a positive working environment, free from any form of discrimination or harassment, where everyone is treated with fairness, dignity, and respect.

Our commitment to creating a diverse and equitable company and a safe, secure and respectful environment applies to all Condé Nast Personnel and job applicants so any business partners working with us need to ensure this also.

Any partner we work with is expected to implement an effective grievance policy for resolving internal disputes and employee complaints. Reprisal, threat, or retaliation against any employee who has, in good faith, raised a workplace concern or reported a suspected violation of any applicable law or regulation, must be prohibited.

#### 2. Ambassadors of Condé Nast

As media professionals, effective and high quality communications are at the heart of everything we do. We expect all of our business partners to carefully select the words you use and the channels of communication you choose, as they may reflect on any connection to Condé Nast given we are a journalist first company. In addition, we recognize our obligation to protect confidential and proprietary information about our business and we expect our business partners to treat our confidential and proprietary information similarly and to alert us immediately in the event of any data protection breach.

In dealings with Condé Nast you will treat its employees honestly, fairly and with respect and courtesy.

#### 3. Being Responsible Content Creators and Journalists

We recognize that responsible, independent and accurate journalism and content creation lie at the heart of our reputation. We have a strong commitment to media ethics including ensuring we can report in an independent way, avoid conflicts of interest in our reporting, and create in a way that protects and respects the safety and well being of all involved. We abide by industry standards and codes where applicable and we expect this of our business partners also.

All journalists, editors, contributors and anyone associated should make all reasonable efforts to ensure that information and content is reported honestly, accurately and fairly. You should only share confidential information with your employees or authorised persons who have a legitimate need to receive it. "Confidential information" includes not only information which has been explicitly designated as confidential but also information which one can reasonably expect should be regarded as

confidential. The instruction not to share confidential information applies to sharing information even with one's family and friends.

As a business partner you should take steps to create, manage, and protect our brands, content, technology, know-how and other intellectual property assets.

We expect our partners working on projects for Condé Nast to treat everyone on the projects with dignity and respect. You will take steps to ensure that all work done for Condé Nast is performed lawfully, pursuant to terms agreed clearly in advance, and is conducted in a professional manner, free of any form of coercion, discrimination, or harassment and in compliance with labour laws and prohibitions against child labour and modern slavery. All photo or video shoots will take place in a secure environment. We will all work to ensure Condé Nast and its business partners maintain a safe workplace; any relevant health, safety, environmental and labour laws will be observed.

## 4. Using and Protecting Our Resources and Assets

Our assets - whether financial, physical, technological or intellectual — are integral to our business operations and success as a company. As a third party working with us, you have a duty to protect Condé Nast's assets by using them appropriately and safeguarding them against unauthorised access, misuse, theft, compromise, or disclosure.

We recognize the centrality of data to the digital world we live in, while also recognizing our responsibilities to ensure that any use we make or our business partners make of personal data in the course of our business is fair, lawful, secure, and transparent. We are committed and expect that you are also committed to high standards of data privacy and information security and to maintaining an approach to these issues that enables us to meet the expectations of those who trust us with their data, as well as

regulators. The company and our business partners will treat and use personal data in accordance with applicable laws and regulations and with accepted business practices. You will implement and operate a privacy policy for your Company in accordance with applicable data protection law which details the safeguards you make when handling data and demonstrates the importance you place on compliance with individuals' data protection rights.

#### 5. Doing Business In The Right Way

Integrity is core to our business and it is your responsibility to uphold this on our behalf so we will be lawful in our behaviour and abide by the applicable laws in the markets in which we operate.

We stand for fair and competitive markets and will conduct business accordingly. We have zero tolerance for bribery and corruption, and we expect anyone working with us to never compromise our integrity by engaging in, or even appearing to engage in, bribery or any other corrupt activity. Consequently, our business partners shall never offer, give, solicit, promise, accept, or authorize any bribes or kickbacks, or engage in any other corrupt activity with a government official, employee, or any other person to obtain any business or improperly influence any business decision.

Our Business Partners acting on our behalf and providing us services or products shall ensure that they remain fully compliant with all applicable trade compliance laws and sanctions regimes, including the laws administered by the Office of Foreign Assets Control of the U.S. Department of the Treasury and any component of the U.K. or E.U. governments imposing economic sanctions and/or trade embargoes against designated countries, territories, entities, and persons, and shall not cause Condé Nast to be in violation of any such laws.

We further expect our business partners to comply with all relevant antimoney laundering laws and regulations, and we urge them to always be alert for suspicious activity that may indicate the possibility of money laundering, such as requests to make or receive payments in cash or cash equivalents or receiving multiple transactions for the payment of a single invoice, and to implement reasonable processes to prevent such conduct.

We similarly expect our business partners to recognize that the goal of insider trading and securities laws is equal access to information for all. Our business partners are, therefore, prohibited from using any material non-public information obtained because of their business relationship with Condé Nast for the gain of the business partner, their employees, or any other third party.

Condé Nast's environmental values are articulated in our <u>Sustainability</u> <u>Statement of Principles</u> and supported by the many corporate and editorial initiatives we champion across our markets. We expect all our business partners to be ambitious in their own Sustainability plans. Condé Nast may request a copy of these policies.

We expect all business partners, companies, contributors and vendors working with Condé Nast to meet all the requirements set out within this Vendor Code of Conduct. Condé Nast may request copies of your company's policies to ensure compliance.

Condé Nast's business partners and other relevant stakeholders can report suspected violations of this Vendor Code of Conduct or any law and regulations via email to <a href="mailto:compliance@condenast.com">compliance@condenast.com</a>