

## GfK Supplier Code of Conduct

GfK values fair, sustainable and transparent business relationships and therefore holds suppliers to the same high standards of integrity to which we hold ourselves. This GfK Supplier Code of Conduct serves to foster and set the framework for such relations by setting out key principles with regard to business ethics and corporate social responsibility.

Additional terms of existing or future contracts between suppliers and GfK may contain stricter provisions that pertain to some of the same issues mentioned herein. Nothing within this Code of Conduct supersedes an existing contract with such stricter provisions. Moreover, if any inconsistencies arise between this Code of Conduct and the stricter provisions of another agreement, the provisions contained in such agreement(s) will take precedence.

Demonstrating business integrity means complying with the following explicit requirements when working with GfK and also conducting all business transactions in line with the principles set out herein:

### 1. Business Ethics

Suppliers must comply with all applicable laws, rules and regulations in the countries in which they operate and are expected to apply best industry standards and practices. All business dealings of suppliers shall be performed with integrity and transparency.

- a. **Bribery & Corruption:** Suppliers must abide by all applicable anti-corruption laws and regulations. GfK does not tolerate any form of bribery and suppliers must not offer anything of value to GfK employees or others in exchange for an undue advantage. Suppliers shall be aware that GfK has internal requirements and GfK employees may be required to seek internal approval prior to offering to or accepting any gifts, benefits or hospitality from a supplier.
- b. **Conflicts of Interest:** Employees of suppliers should regularly consider the relationships between private interests and business duties pertaining to GfK and must disclose any identified conflicts of interest to GfK in a timely manner and where necessary, take appropriate action to manage the conflict.
- c. **Data Protection & Privacy:** Commitment to the highest standards of data protection is an integral component of GfK's business. Suppliers must abide by applicable privacy laws and must implement appropriate safeguards to adequately protect personal data.
- d. **Fraud:** Suppliers are expected to always act with honesty and integrity and must not engage in fraudulent activity including but not limited to misrepresentation of information, misleading marketing and manipulation or fabrication of data.
- e. **Fair Trade & Competition:** Suppliers must comply with applicable antitrust and competition laws. In recognizing the importance of free and open competition,

suppliers shall also respect the intellectual property rights of others and not make use of information disclosed in breach of a confidentiality agreement.

## 2. Labor & Human Rights

Our suppliers are expected to value and protect the human rights and to treat their employees with dignity and respect.

- a. **Health & Safety:** Suppliers shall ensure that their employees are provided a safe workplace that meets required occupational health and safety standards and regulations and shall implement measures to minimize injuries and health incidents.
- b. **Anti-Discrimination & Anti-Harassment:** Suppliers are not permitted to engage in discrimination or harassment of any kind and are expected to promote an inclusive workplace including by ensuring equal opportunities in hiring and promotion practices.
- c. **Wages & Working Hours:** Suppliers must comply with applicable regulations concerning working hours and minimum wage legislation. Furthermore, we expect suppliers to value and afford fair working conditions to their employees which may go beyond minimum local legal requirements.
- d. **Child & Forced Labor:** Suppliers are prohibited from using child labor within their organization (as defined by the International Labour Organization). Furthermore, suppliers must not utilize or instigate any kind of forced or involuntary labor (as defined by the International Labour Organization).
- e. **Slavery & Human Trafficking:** Suppliers must comply with all applicable legislation and international conventions that prevent and prohibit slavery and human trafficking (e.g. Modern Slavery Act 2015).
- f. **Freedom of Association & Collective Bargaining:** Suppliers shall follow International Labour Organization Conventions on freedom of association, collective bargaining and workers' representatives by respecting employees' right to seek representation and to form and join a trade union of their choice and the right to collective bargaining.
- g. **Non-Retaliation:** GfK does not tolerate retaliation. Suppliers must enable their employees to exercise their rights and provide means for employees to raise concerns without fear of discrimination, reprisal, intimidation, harassment or other forms of retaliation.

## 3. Environmental Protection

Suppliers must comply with all applicable laws, regulations and standards related to environmental protection. GfK suppliers are expected to take all reasonable measures to minimize negative impacts on the environment including by establishing and maintaining an

environmental management system. Suppliers are also expected to encourage the development and diffusion of environmentally friendly technologies.

Appropriate to their respective line of business, suppliers' environmental management systems should incorporate measures to address:

- biodiversity
- energy consumption and greenhouse gases
- water consumption
- pollution and waste
- resource conservation
- animal welfare

#### **4. Compliance with the GfK Supplier Code of Conduct**

- a. GfK may monitor compliance with this Code of Conduct in relation to the services rendered to GfK, including by means of dedicated audits. Suppliers shall cooperate by complying with reasonable requests from GfK in this regard.
- b. In addition, GfK's Critical Suppliers may be required to undergo a CSR or ESG assessment at their own expense and conducted by a reputable service provider selected by mutual agreement of GfK and the supplier. If the supplier already has a valid CSR or ESG assessment, they may be required to share the results with GfK. A Critical Supplier is a company that meets at least 1 of the 3 criteria below:
  - 1) Combined value of contracts with GfK is equal to or greater than EUR 500,000.00 on an annual basis.
  - 2) Provides goods and services that have a direct impact on GfK's ability to deliver services to its customers
  - 3) Based on GfK's internal assessment, the supplier may be exposed to certain CSR risk in relation to this Code of Conduct

Where a Critical Supplier's CSR assessment identifies high risk / high priority improvement areas, Suppliers may be required to take remedial action and if and where possible GfK will try to provide guidance and best practices.

- c. We reserve the right to change the requirements of this Code of Conduct from time to time. A current version can be found at the following URL: [www.GfK.com/supplier](http://www.GfK.com/supplier)
- d. In case a supplier already has robust Code of Conduct and Sustainability policies covering the areas of Business Ethics, Labor & Human Right and Environmental Protection, which GfK deems to be equal or better than GfK's own policies, GfK reserves the right to waive Clause 4 and the possible signing of the Code of Conduct.

## 5. Communication throughout the Supply Chain

It is required that suppliers communicate the principles laid out in this Supplier Code of Conduct to their employees and throughout their supply chain. Suppliers must require their subcontractors to commit to standards and principles equivalent to those set out in this Code of Conduct.

## 6. Reporting Concerns

Suppliers are encouraged to report to GfK any breaches of this Code of Conduct and also any potential unethical or unlawful behavior of GfK identified in the course of conducting business with us. Please use the Whistleblowing@GfK platform for this purpose: <https://gfk.whistleblownetwork.net/>

## 7. Supplier Declaration

We hereby agree to adhere to this GfK Supplier Code of Conduct.

For and on behalf of Supplier:

Supplier Legal Entity:.....

Name of signatory:.....

Position:.....

Signature:.....

Date:.....