AHEAD GROUP

Supplier Code of Conduct

Ahead Group Norway and subsidiaries

Version
2.0 – draft

Issued by
Ahead Group Norway AS

Aligned with
Aller Group Supplier Code of Conduct

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This Code is aligned with the Aller Group Supplier Code of Conduct and applies to all suppliers of Ahead Group Norway AS and its subsidiaries.

01

Introduction

Our commitment

Ahead Group Norway AS is committed to creating exceptional brand experiences, while making sure that our business is conducted in a way that respects people, minimises environmental impact and contributes to society as a whole. Our responsibility does not stop at our own front door. It extends to the suppliers and partners who help us create what we deliver to our clients – from insights, production, and media to technology, data, content and events.

This Supplier Code of Conduct ("Code") sets out what we expect of you as our supplier. We see responsible conduct as a shared foundation for long-term cooperation, and we want to be proud not only of what we deliver, but also of how it is delivered.

Ahead Group Norway is part of the Aller A/S group, and this Code is aligned with the Aller Group Supplier Code of Conduct. It is based on internationally recognised principles for responsible business conduct: the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

Scope and application

This Code applies to all suppliers, business partners and subcontractors that provide goods or services to Ahead Group Norway AS or any of its subsidiaries, including Bloom, WergelandApenes, 11:11, Oculos and Ahead Group Consulting (together "Ahead Group"), regardless of geography or type of service. We expect you to pass on equivalent requirements to the suppliers and subcontractors that support your work for Ahead Group, and to make sure that everyone engaged in that work follows this Code.

Self-employed individuals who perform work for Ahead Group themselves – such as freelancers – are covered by the Aller Code of Conduct, also when they invoice through their own company. If a self-employed individual delivers through a company with its own staff, this Code applies.

We apply this Code in a risk-based and proportionate way. What we ask of you depends on your role, your size, the goods or services you provide and the risks connected to them, and not every section will be equally relevant to every supplier. Our approach is built on dialogue, cooperation and continuous improvement.

> **Two levels of requirements**
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> **Fundamental requirements** – including compliance with all applicable laws and regulations and holding the licences and permits your activities require – must always be respected. Breaches may lead to immediate termination of the agreement.
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> **Responsible business standards** describe what we expect of you. Where gaps are identified, we expect you to close them within an agreed timeframe. Gaps that persist may lead to the consequences described under *Corrective action and consequences*.

This Code forms part of our agreements with you, and it shall be enforced with the same importance as any other provision between the parties. By entering into an agreement with Ahead Group or accepting an order from us, you agree to follow it. The Code sets minimum standards. Where local law and this Code differ, the higher standard applies, and where your agreement with Ahead Group sets stricter requirements, those apply. Additional requirements may be agreed as part of the contract, depending on the goods or services provided. Nothing in this Code limits Ahead Group's rights under applicable law or our agreements with you.

02

Human and labour rights

Workers are the most valuable asset of any organisation. We expect you to respect internationally recognised human and labour rights and to treat everyone who works for you with dignity and fairness. This applies to your own operations, your supply chain and the people and communities affected by your activities. We also expect you to take steps to identify, prevent and address adverse impacts on people in your operations and supply chain. In this Code, “workers” means everyone performing work in connection with your activities, regardless of employment status or type of contract.

1 Child labour and protection of children

Ahead Group does not accept the use of child labour or any practices that may harm the health, safety, education or development of children and young workers. These expectations are aligned with ILO Convention No. 138 on Minimum Age and ILO Convention No. 182 on the Worst Forms of Child Labour.

FUNDAMENTAL REQUIREMENTS

- Do not employ or benefit from the use of child labour in your own operations or supply chains.
- Never involve children or young workers under the age of 18 in work that is hazardous, exploitative or harmful to their health, safety, morals or development, and do not let them work at night.
- Ensure that the minimum age for employment complies with applicable laws and internationally recognised standards. For regular employment, the minimum age is 15 years, or higher where national law requires.
- Do not engage in, facilitate or benefit from commercial or sexual exploitation, abuse or harassment of children or other vulnerable persons, and act when you become aware of it.

RESPONSIBLE BUSINESS STANDARDS

- Where young workers are legally employed, ensure that work is light, appropriate to their age and does not interfere with their education or development.
- Have reasonable measures in place to verify age and prevent child labour.
- Where your activities may affect children – for example in productions, shoots, events or campaigns involving minors – have measures in place to prevent, identify, report and respond to exploitation or unsafe contact.

2 Forced labour and human trafficking

Ahead Group does not tolerate forced labour, bonded labour, human trafficking or any form of involuntary work. Employment must always be freely chosen. These expectations are aligned with ILO Convention No. 29 on Forced Labour and its 2014 Protocol, and ILO Convention No. 105 on the Abolition of Forced Labour.

FUNDAMENTAL REQUIREMENTS

- Do not engage in or benefit from human trafficking or forced, bonded, indentured or involuntary labour in any form.
- Ensure that workers are free to leave the workplace at the end of the working day and free to leave employment after reasonable notice, and that they are not subject to coercion, threats or abuse.
- Do not retain or withhold workers’ identity documents, passports or work permits.
- Do not charge workers any fees or costs related to their recruitment, placement or employment, whether directly or through recruitment agencies or intermediaries.

RESPONSIBLE BUSINESS STANDARDS

- Take reasonable steps to prevent and address risks of forced labour in recruitment and subcontracting practices.

3 Freedom of association and collective bargaining

We expect you to respect workers' rights to freedom of association and collective bargaining, in accordance with applicable laws.

FUNDAMENTAL REQUIREMENTS

- Respect workers' rights to form and join trade unions or other representative organisations of their choice.
- Respect workers' rights to engage in collective bargaining.
- Ensure that workers are not subject to retaliation, discrimination or harassment for exercising these rights, or influenced on the basis of union membership.

RESPONSIBLE BUSINESS STANDARDS

- Where freedom of association is restricted by law, allow workers to engage in lawful alternative forms of worker representation.

4 Working conditions and working time

We expect you to provide fair, lawful and transparent working conditions that support workers' health, safety and well-being.

FUNDAMENTAL REQUIREMENTS

- Provide wages, benefits and overtime compensation in accordance with legal and contractual obligations.
- Ensure that working hours, overtime and rest periods comply with applicable legal requirements and internationally recognised labour standards, including relevant ILO standards. Normal working hours should not exceed 48 hours per week on a regular basis, excluding overtime, and working arrangements must not jeopardise workers' health, safety or well-being.
- Ensure that overtime is voluntary and fairly compensated, at a rate higher than the regular hourly rate.
- Ensure that workers are covered by legally required social protection schemes and appropriate arrangements for work-related injuries and accidents.

RESPONSIBLE BUSINESS STANDARDS

- Pay workers on time and in a transparent manner, and seek to ensure that wages are sufficient to meet basic needs (a living wage).
- Give all workers a written employment contract they can understand, with conditions for part-time and temporary workers no less favourable than for permanent workers.
- Limit overtime to 12 hours per week, or a lower limit set by local law, and give workers at least one day off in every seven-day period, as well as regular breaks.
- Give workers annual leave, sick leave and parental leave, and ensure that they can return to work on the same terms without dismissal or discrimination.
- Only make deductions from wages as a disciplinary measure where permitted by law and expressly agreed.
- Where accommodation or facilities are provided, ensure that they are safe, hygienic and respectful of workers' dignity, with access to clean drinking water and adequate sanitary facilities.

5 Health and safety

We expect you to provide safe and healthy working environments appropriate to the nature of your activities.

FUNDAMENTAL REQUIREMENTS

- Identify, assess and mitigate risks to workers' physical and psychological health and safety, including psychosocial risks such as excessive workload, unreasonable working pressure and lone or night work.
- Provide relevant training, information and approved protective equipment appropriate to the work performed, before the work starts.
- Maintain appropriate emergency preparedness and response procedures that ensure access to help in case of accidents and emergencies.

RESPONSIBLE BUSINESS STANDARDS

- Keep a written safety plan and risk assessments that are reviewed regularly, and involve workers in safety work.
- Record and investigate accidents, injuries and near misses accurately, report them to authorities where required, and act to prevent recurrence.
- Take additional precautions where activities involve elevated safety risks, including productions, shoots, events, outdoor or location-based activities.
- Protect the health and safety of customers, participants and others affected by your services, including through emergency arrangements and incident response.

6 Non-discrimination and respectful treatment

We expect all workers to be treated with dignity and respect, based on objective and relevant criteria.

FUNDAMENTAL REQUIREMENTS

- Ensure equal opportunity and non-discrimination in recruitment, employment, pay, development and termination, regardless of gender, sexual orientation, ethnicity, colour, religion, language, political opinion, nationality, union membership, health, disability, age or other personal characteristics.
- Do not tolerate harassment, bullying, intimidation or abusive behaviour, whether physical, verbal, psychological or sexual.
- Protect workers from violence, threats or abuse in the workplace.

RESPONSIBLE BUSINESS STANDARDS

- Ensure that disciplinary practices are fair, proportionate and respectful of human dignity.

03

Environment

7 Environmental responsibility

Ahead Group strives to keep its environmental impact to a minimum, both by following applicable regulations and by contributing to international climate goals. We expect you to manage your environmental impacts responsibly and to help protect the climate, natural resources and ecosystems.

FUNDAMENTAL REQUIREMENTS

- Comply with applicable environmental laws, permits and regulatory requirements.
- Take appropriate measures to prevent and mitigate pollution and environmental harm, including air emissions, noise, and discharges to ground and water.
- Do not cause, or conceal, severe harm to the environment, animals or local communities.

RESPONSIBLE BUSINESS STANDARDS

- Identify and manage significant environmental risks and impacts related to your activities, and work systematically to improve over time.
- Use energy, water and raw materials responsibly and seek to improve efficiency over time.
- Reduce your greenhouse gas emissions. If your climate impact is significant in relation to Ahead Group's value chain, be able to report on your emissions and show a direction for reduction over time.
- Prevent and minimise waste, keep records of waste generated (hazardous and non-hazardous), and promote reuse and recycling. Dispose of hazardous waste only in line with local regulations and international standards.
- Have procedures for the safe procurement, handling and storage of chemicals.
- Consider environmental impacts when planning productions, events, transport and logistics.
- Avoid sourcing materials, including paper, print and other wood-based products, in a way that contributes to deforestation or forest degradation.
- Take reasonable steps to avoid significant harm to ecosystems and natural habitats.

04

Business ethics

We expect you to conduct business with integrity, honesty and transparency in all your dealings with Ahead Group, our clients, public authorities and other partners.

8 Anti-corruption and improper influence

Ahead Group does not tolerate corruption, bribery or any other form of improper influence. Likewise, no employee of Ahead Group shall demand or expect such advantages.

FUNDAMENTAL REQUIREMENTS

- Do not engage in or tolerate corruption, bribery, blackmail, fraud, embezzlement, facilitation payments or other unethical business practices.
- Do not offer, promise, give, request or accept anything of value that could improperly influence business decisions.
- Do not use political contributions, charitable donations or sponsorships to obtain improper influence or unfair competitive advantage.
- Comply with applicable trade sanctions and export control laws. Do not engage in transactions or business relationships with sanctioned individuals, entities or countries.

RESPONSIBLE BUSINESS STANDARDS

- Implement appropriate measures to prevent corruption risks, including in interactions with public officials, agents and intermediaries.
- Exercise appropriate oversight of agents, intermediaries and other third parties acting on your behalf to ensure alignment with these principles.

9 Conflicts of interest

We expect you to act in the best interests of the business relationship with Ahead Group and to avoid situations that may compromise independent judgement.

FUNDAMENTAL REQUIREMENTS

- Ensure that personal, financial or other interests do not improperly influence business decisions.

RESPONSIBLE BUSINESS STANDARDS

- Identify and manage actual or potential conflicts of interest.
- Disclose any conflict of interest that may affect, or appear to affect, your relationship with Ahead Group or our clients.

10 Gifts, hospitality and advantages

We expect you to act with integrity when offering or receiving gifts, hospitality or other advantages.

FUNDAMENTAL REQUIREMENTS

- Do not offer or accept gifts, hospitality or advantages that could create a sense of obligation or influence business decisions.
- Comply with applicable laws and any relevant contractual requirements relating to gifts and hospitality.

- Never offer cash gifts to Ahead Group employees.

RESPONSIBLE BUSINESS STANDARDS

- Ensure that gifts and hospitality are reasonable, infrequent, transparent and in line with customary business practices.

11 Fair competition and market conduct

We expect you to compete fairly and to conduct business in accordance with applicable competition and market conduct laws.

FUNDAMENTAL REQUIREMENTS

- Comply with applicable competition and antitrust laws.
- Do not engage in anti-competitive practices, including price-fixing, bid-rigging, market sharing or abuse of a dominant position.
- Avoid misleading, deceptive or unfair business practices.
- Do not engage in illegal trade or deal in unlawful products.

12 Confidential information and intellectual property

We expect you to protect confidential information and respect intellectual property rights – including those of Ahead Group's clients.

FUNDAMENTAL REQUIREMENTS

- Protect confidential information belonging to Ahead Group, our clients or other third parties.
- Use confidential information only for legitimate business purposes.
- Respect intellectual property rights and avoid unauthorised use, copying or distribution, including of images, music, fonts, footage and other licensed material.

RESPONSIBLE BUSINESS STANDARDS

- Maintain appropriate safeguards to prevent unauthorised access, disclosure, loss or misuse of information.

13 Data protection and information security

We expect you to process personal data responsibly and to safeguard information systems.

FUNDAMENTAL REQUIREMENTS

- Process personal data in compliance with applicable data protection laws, including the GDPR, and any data processing agreement with Ahead Group.
- Protect personal data and information systems against unauthorised access, loss or misuse.
- Notify relevant parties of data security incidents where required by law or contractual arrangements.

RESPONSIBLE BUSINESS STANDARDS

- Implement appropriate technical and organisational measures proportionate to the nature and scale of the data processing activities.
- Limit access to personal data to authorised individuals only.

14 Marketing, communication and media integrity

As a marketing and communication group, this area is central to our work. If you work with marketing, advertising, media, influencer marketing, content production or communication on behalf of Ahead Group or our clients, we expect you to act responsibly, transparently and with respect for consumers, audiences and end-users.

FUNDAMENTAL REQUIREMENTS

- Ensure that marketing and communication are truthful, accurate and not misleading.
- Clearly distinguish between editorial content and commercial or sponsored content, and label advertising clearly – including influencer and native content.
- Comply with applicable consumer protection, marketing and advertising laws.

RESPONSIBLE BUSINESS STANDARDS

- Respect editorial independence and avoid undue commercial or political influence on editorial content.
- Take particular care to protect children and other vulnerable audiences in marketing and communication activities.

15 Responsible use of artificial intelligence

If you use artificial intelligence in work produced for or on behalf of Ahead Group, we expect you to do so responsibly and in a way that upholds accuracy, transparency and respect for individuals' rights.

FUNDAMENTAL REQUIREMENTS

- Ensure that AI-generated outputs used in work for Ahead Group are accurate, reviewed by a qualified individual before use, and do not infringe third-party intellectual property or copyright.
- Do not use personal or confidential data belonging to Ahead Group, our clients or customers as inputs to AI tools without appropriate authorisation and data protection safeguards.

RESPONSIBLE BUSINESS STANDARDS

- Inform Ahead Group when a substantial part of the content you deliver has been generated or altered by AI, and follow any labelling requirements set out in your agreement with Ahead Group.
- Implement appropriate governance and oversight to ensure AI tools used in connection with Ahead Group's business are used ethically and in compliance with applicable laws and regulations.

05

Working together

Our ambition to act responsibly applies both to our own operations and to the suppliers we choose to work with. When we choose suppliers and throughout our cooperation, we consider not only quality, price and professionalism, but also how you live up to this Code. The sections below describe what we expect, how we follow up and what happens if something goes wrong.

Management systems

We expect you to assign clear responsibility for compliance with this Code and to make sure relevant employees know its requirements or equivalent standards in your own policies. We also expect you to understand the most significant risks to people, the environment and business ethics in your operations, to keep records that show how you meet this Code, and to hold the insurance and professional competence your services require. You should also give workers and other stakeholders an accessible and confidential way to raise concerns without fear of retaliation, and make sure concerns are handled fairly and promptly.

Information, assessment and audit

We may ask you to document how you meet this Code, for example through dialogue or a self-assessment questionnaire. Suppliers whose activities are significant for our sustainability reporting may also be asked to provide environmental, social and governance data, such as greenhouse gas emissions, energy use, working conditions and business conduct, and are expected to do so accurately and on time. We also expect you to inform us without delay of serious incidents related to your work for Ahead Group.

Where there is a concrete risk or indication of a breach, we may carry out an assessment or audit, directly or through a third party, including through access to relevant premises, documentation and personnel with reasonable notice. We expect you to cooperate fully with any such assessment or audit. Refusing to cooperate or deliberately giving us false or misleading information may be treated as a material breach of this Code.

Corrective action and consequences

If we become aware of a breach, we expect you to engage constructively and agree a time-bound corrective action plan, including remedy for affected people where harm has occurred. If breaches are serious or continue, Ahead Group may suspend the business relationship, exclude you from new business until sufficient progress has been made, or terminate the relationship and any related delivery agreement. Breaches of the fundamental requirements may lead to immediate termination. This Code does not affect Ahead Group’s contractual rights to manage, amend or terminate supplier relationships for commercial or other business reasons.

Reporting concerns

Anyone in your organisation or supply chain who suspects a breach of this Code or the law in connection with your business with Ahead Group can report it through your own grievance mechanisms or through the Aller group whistleblower channel: https://whistleblowersoftware.com/secure/AllerGroup. Reports can be made anonymously

and are handled confidentially and in line with applicable law. Ahead Group does not tolerate retaliation against anyone who raises a concern in good faith, and we expect the same of you.

Effective date and contact

This Code applies from 11 November 2026 and replaces Ahead Group Norway’s previous Supplier Code of Conduct. We may update it to reflect changes in regulation, our business or our risks, and the most recent version is available on aheadgroup.no. Questions about this Code can be directed to your contact person at Ahead Group Norway or to info@aheadgroup.no.