

# Code of Conduct



For all employees, creators, collaborators, board members and affiliated partners.



# Foreword



This Code of Conduct (the “Code”) underpins our ability to behave in a manner consistent with our values. It is not meant to provide specific guidance on every situation. Instead, it is **principle-based guidance** that helps us think about difficult questions, promotes consultation, and encourages us to speak up if we have concerns.

**We expect everyone at Podimo, including those at our affiliated companies, to be familiar with and follow the Code. Compliance with the Code is a shared responsibility that is an integral and non-negotiable part of our roles.**

As we engage and collaborate with partners, including creators and third-party vendors, we place great value on their respect for and adherence to this Code. We expect them to conduct their Podimo-related activities in accordance with this Code and share our commitment to ethical conduct and upholding the standards set forth in this Code.

# Welcome to Podimo!

And thank you  
for listening

At Podimo, our values - **the three C's** - provide us with a common language and alignment on how we operate, act, and behave both internally and externally ... we do it all with a lot of passion and we have fun!



We **care** deeply and  
show respect.



We are **courageous**  
and confident.



We are **curious** with an  
experimental mindset.



# Representing Podimo

When representing Podimo (including our subsidiaries/affiliated companies), it is expected that you always act as a true ambassador of who we are.

This means that no matter your responsibilities, you act with high ethics and keep our values in mind.

**Specifically, this should be reflected in:**



**1** **How we treat each other and external partners**  
Nurture a supportive, respectful and caring work environment fostering teamwork and valuing diverse perspectives.

**2** **How you communicate within and outside of Podimo**  
Engage in clear, respectful, and inclusive communication that promotes understanding and collaboration.

**3** **How you make decisions**  
Consider the impact on your team, creators, users and our stakeholders. Be careful to balance the interests of all groups when you go about our business and keep ethical and moral standards high.



# We are in it together



## **Act with integrity and honesty on the job**

Be truthful, transparent, and accountable for your actions and decisions.



## **Be familiar with the Code, follow the Code at all times, and seek help when you have a question**

Review the Code regularly, seek clarification when needed, and actively incorporate its principles into daily work.



## **Comply with all applicable laws and regulations while performing your duties**

Adhere to legal requirements and conduct business in a lawful and ethical manner.



## **Share concerns about any conduct that violates our Code**

Speak up and report any observed or experienced behaviour that goes against our values or policies.

If you have questions or find yourself in a situation where you feel the Code may be violated, witness wrongdoing, or are uncertain about how to navigate a challenging situation, please contact the People & Culture team or email [conduct@podimo.com](mailto:conduct@podimo.com). Failing to follow the Code may lead to disciplinary action or even termination of employment or continued commercial relationship.



# Our commitment to each other

Being part of our community, we expect you to listen and engage. We value diversity of all kinds and help each other build a safe community where all ideas, thoughts, and feelings **are welcome.**

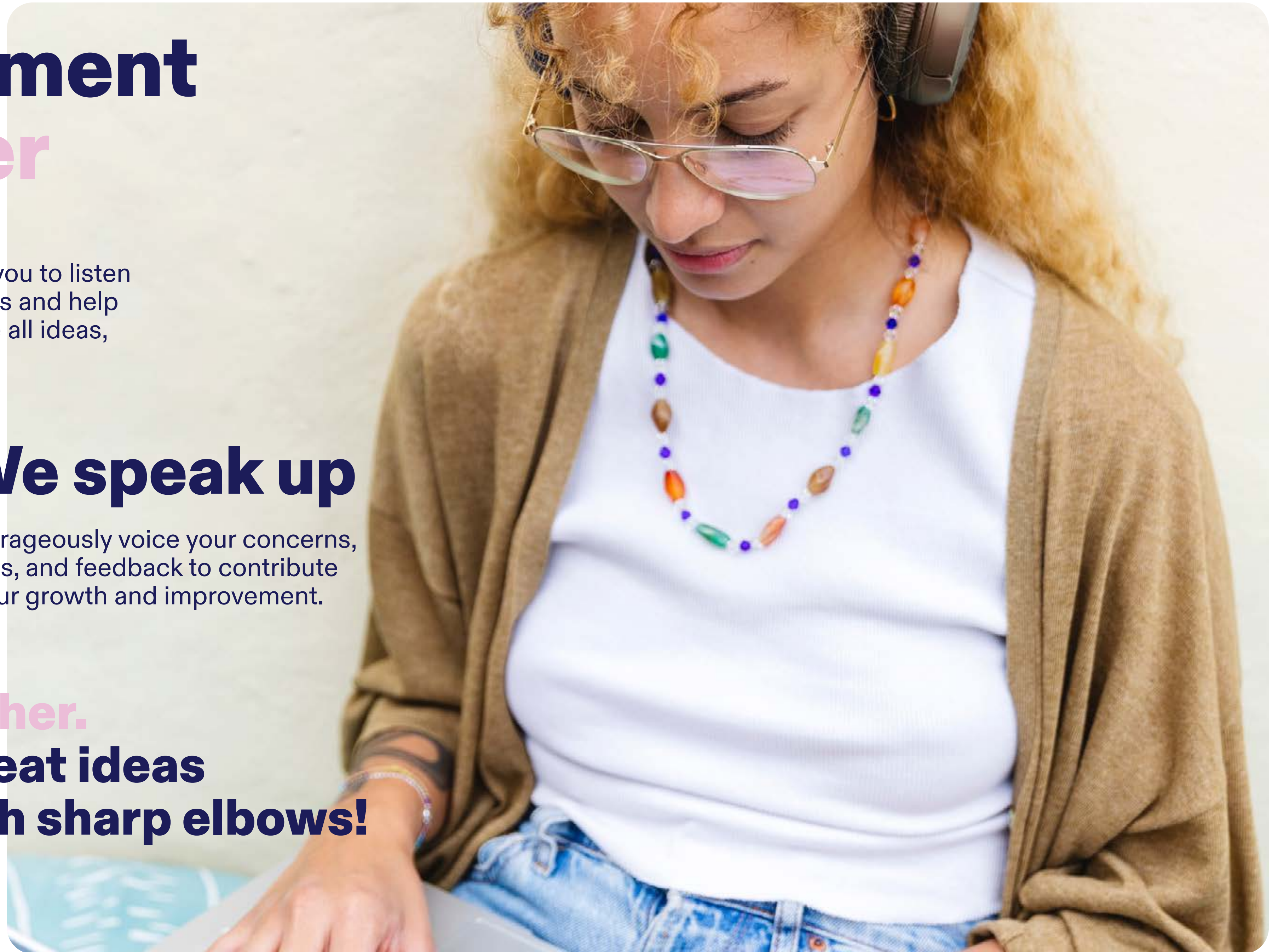
## We listen

Pay attention to others actively, seek understanding, and value different perspectives.

## We speak up

Courageously voice your concerns, ideas, and feedback to contribute to our growth and improvement.

**We are better together.**  
**We don't believe great ideas**  
**excuse big egos with sharp elbows!**





# Inclusive language and communication

We strive for a culture where all individuals thrive. Be mindful and use inclusive language and expressions that include everyone. **Here are some examples:**

Instead of “hi guys” or “hi girls”,



You can use “**hi all**” or “**hi team**”.

Please use stated pronouns (when known) towards anyone your work with.



When in doubt, you can use “**They/them/their**”.

Instead of asking about a person’s “husband/ wife/girlfriend or boyfriend”,



You can ask about that person’s “**partner**”.

While we understand mistakes can happen when operating at a fast pace, we encourage considerate communication, both written and verbal. As members of the Podimo community, we take part in a global community that requires a mindful and caring approach.

If you are unsure, consult **The Diversity Style Guide for Journalists** for further guidance (see [the useful links section](#)).



# Discrimination, Bullying and Harassment

## **The mix of global and local is a big part of our DNA!**

Diversity makes us who we are, and it is our greatest asset in all aspects. Our goal is an inclusive work environment where everyone thrives. By always treating people with respect and care, you're making that happen.

Abusive acts primarily hurt victims, but also have a negative impact on other team members or external partners. Such acts jeopardise our general work environment, culture, and the ability to innovate and support each other.

**We do not tolerate discrimination, bullying, sexual harassment, or any other abusive or degrading acts.**

**Examples include** hurtful or inappropriate comments, unwanted touches, degradation, or exclusion based on age, gender identity, sexual orientation, ethnicity, or religious beliefs.



# Manager Responsibility

**We look to you to model ethical behaviour and promote a workplace where everyone feels comfortable speaking up. We need you to be attentive and follow up on all misconducts.**

Managers who knowingly allow or tolerate any form of harassment, including the failure to immediately report such misconduct to People & Culture, may face disciplinary action, including possible termination.

**If you are an informed manager, you are expected to:**

- 1** Take all complaints or concerns of alleged harassment seriously, regardless of who is involved.
- 2** Ensure that any form of harassment or misconduct is immediately reported to People & Culture or via email at [conduct@podimo.com](mailto:conduct@podimo.com).
- 3** Take appropriate action to prevent retaliation during and after an investigation of alleged misconduct.

**If you are a manager, you have a greater level of responsibility.**




# Addressing Violations of the Code

If you ever find yourself in a situation where you believe you're facing harassment or witnessing a violation of our Code, please know that we're here to support you every step of the way.

## Here's what you can do:

- 1 Speak Directly with the Person:**  
You can choose to have an honest conversation with the individual responsible for the behaviour. Let them know that their actions are making you uncomfortable, and you'd like them to stop.
- 2 Seek Advice from Your Manager:**  
If you'd rather not tackle the issue head-on or you're uncertain about the best course of action, reach out to your manager. They're here to support you and can provide guidance.
- 3 Contact People & Culture:** We are ready to assist you. Don't hesitate to get in touch for help and support in addressing the situation.
- 4 Use the Conduct Reporting Email:**  
You can also report the issue by sending an email to [conduct@podimo.com](mailto:conduct@podimo.com). This email channel is available for reporting any concerns related to violations of our Code of Conduct and is managed solely by Josephine Winther, Lasse Koch and Eva Lægdsgaard from our People & Culture team.
- 5 Use the whistleblower channel:**  
If you prefer to report anonymously, you can do so via our third party whistleblower channel. See next page for more information.
- 6 Once you report a concern,**  
our People & Culture team will promptly initiate an impartial investigation. Depending on the circumstances, we may involve Podimo's General Counsel or an independent third party to ensure fairness.



You can trust that we'll handle it discreetly, only involving those who need to know and when it's necessary.



# Whistleblower Reporting

## Safe and Anonymous

We have established a whistleblower channel to empower and safeguard all individuals covered by this Code. This program encourages and supports anyone who wishes to report concerns, suspicions, or misconduct, ranging from issues like fraud, corruption, and other illicit activities that could harm our business or reputation to instances of discrimination, bullying, and harassment.

The whistleblower channel ensures that anyone who reports is shielded from retaliation, discrimination, or any other negative consequences.

**We want you to feel confident that you can speak up, always!**

We take all reports seriously and thoroughly investigate them. If we find any evidence of misconduct, we take appropriate action to address the issue and prevent it from recurring. You decide if you wish to raise your concern confidentially by providing your name and contact details or do so anonymously. Additionally, when you file a report, you will have the option to select from a list of dedicated case handlers who will assist you throughout the process.

**Remember, your voice matters, and we are here to support you every step of the way.**



Scan the QR code or click on the following [link](#) to report.



**Eva Lægdsgaard**  
Chief People Officer



**Jakob Aurelius**  
General Counsel



**Lasse Koch**  
Strategic People Partner



**Josephine Winther**  
Global Director of  
People & Culture



# Non-Retaliation

We encourage you to speak up against any wrongdoing when it happens. We all rely on every employee taking that responsibility and the goal is always to resolve problems as quickly as possible so that we all can continue doing great work!

If you report something you suspect violates this Code, our policies, or the law, **it is not allowed to retaliate against you in any way.**

All we ask is that you only raise concerns in good faith. “In good faith” doesn’t mean you have to be right or even sure that a violation has occurred, it just means that you believe whatever you report is truthful.





# Doing Business the Right Way

1

Conflicts of Interests

2

Protecting Podimo

3

Anti-Corruption

4

Fair Competition





# Conflicts of Interests

We expect you to always do what's best for Podimo, our users and content creators. Each of us has an obligation to make objective decisions on behalf of the company and avoid situations where a conflict exists between Podimo's interests and our own personal interests.

Conflicts of interest can create or appear to create divided loyalty, influence decision-making, impair judgement, and compromise our integrity and credibility.

Such situations could be conflicting loyalties between personal and professional benefits for ourselves, friends, or family, and Podimo. These conflicts of interest include financial investments, creator relationships, vendor relationships, hiring, family or personal relationships, or personal business activities.

**Failure to disclose a conflict of interest can result in disciplinary action, up to and including termination. We will review and address each situation on a case-by-case basis to determine the appropriate course of action. Everyone covered by the code must disclose any actual or potential conflicts of interest promptly and in writing to People & Culture or [conduct@podimo.com](mailto:conduct@podimo.com).**



# Protecting Podimo

Always protect Podimo's intellectual property, systems and related personal information. Check our IT Security Policy (see [‘Useful Links’](#)) and reach out to the Legal Team with any questions!

For Podimo intellectual property, i.e. trade secrets and other confidential information, be mindful! You are responsible for keeping your access safe, proper contracting and conscious social media usage (see link to ‘Social Media Policy’ in [‘Useful Links’](#)).

Other confidential material should only be disclosed in Podimo's best interests and includes everything from financial information to business plans. Please take extra care to make sure no unwanted access is created when in public, travelling and/or working remotely.

**Personal information**, that in any way or combination with other data identifies an individual, needs to be collected, used and handled with special care, only for specific and transparent purposes for a limited amount of time. Approved 3rd party systems that are granted access to personal data need to be mapped and monitored by the Legal Team. If you are responsible for bringing on a new vendor, involve the Legal Team in addition to notifying the Finance Team.





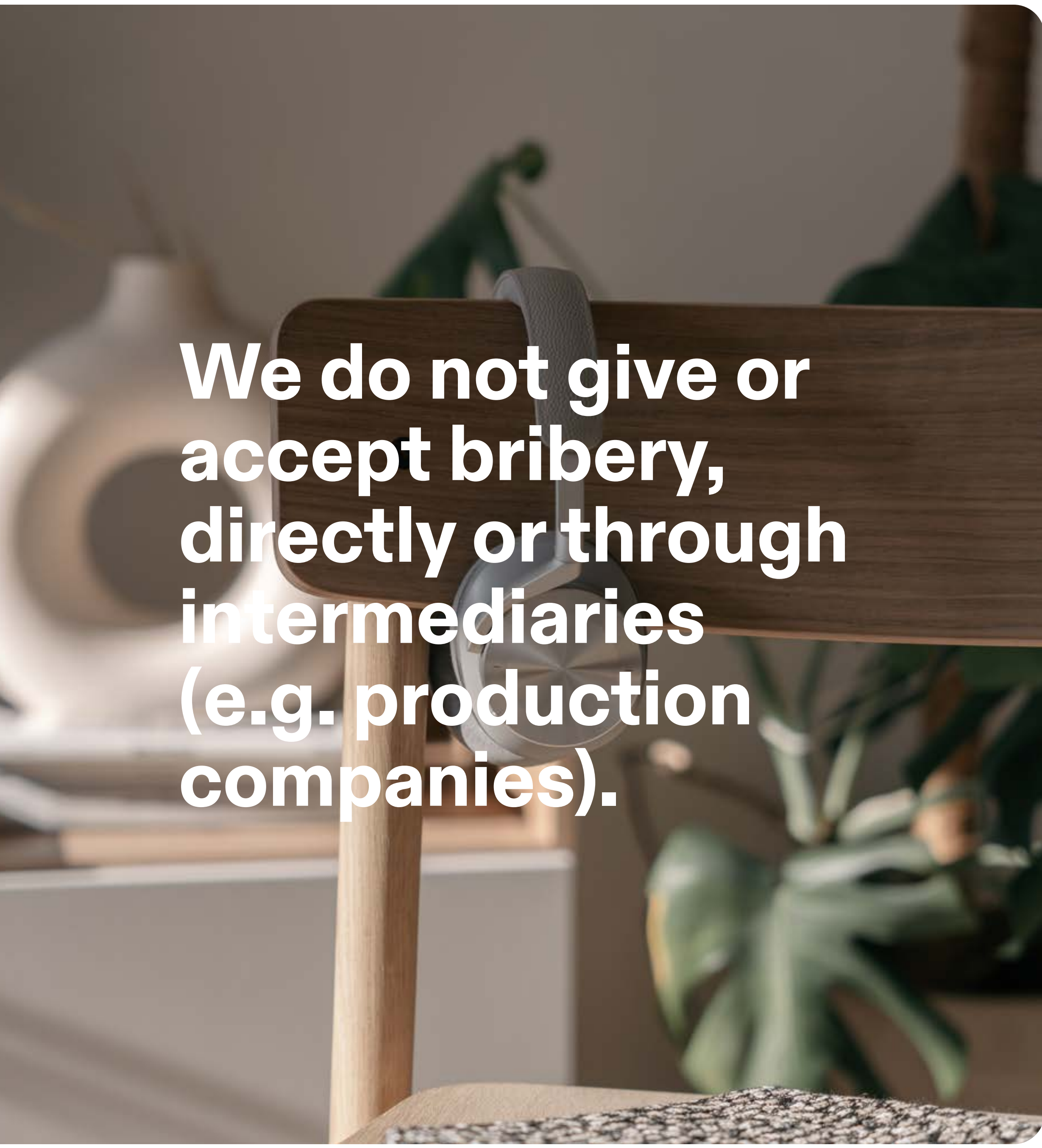
# Anti-Corruption

## What are bribes?

These are anything of value given to win business or an unfair advantage or influence decisions. Cash, gifts, meals and entertainment, jobs for relatives, discounted products, donations, and travel expenses are examples.

## Could this be you?

I am managing a project and evaluating vendors for a new production. A representative of one of the vendors invites you to a restaurant to discuss their proposal. During the extravagant meal, they offer you to use their luxurious villa in France for free. Could these perks influence your judgement?



**We do not give or accept bribery, directly or through intermediaries (e.g. production companies).**





Bribes are a tricky area, so be mindful of the context. Before giving or accepting anything of value, we ask that you consider:

**Could this be perceived as influencing a decision?**

If in doubt, reach out and discuss with your manager and/or the Legal Team.



# Gifts and Entertainment

**What are G&E?** Gifts and Entertainment (“G&E”) typically covers presents, dining, travel and other forms of hospitality but really encompasses anything of value or anything perceived by the recipient to be of value, regardless whether at a cost to the provider or not.

**Remember:**

- Never use G&E to improperly influence someone.
- Never provide cash gifts (or cash equivalents)
- Cash gifts, cash equivalents, or gifts that easily could be converted to cash should never be given (for example, store vouchers).
- Never receive G&E that compromises your judgement.

If you receive or are offered any G&E with questionable appropriateness, always inform your manager and the Legal Team for advice on how to proceed. Any G&E to be provided to an officer, an employee or any other person acting on behalf of a government or public organization/institution needs to be modest and documented with prior approval from the Legal Team, [legal@podimo.com](mailto:legal@podimo.com)

## Could this be you?

*“A company we have partnered with sent me a holiday gift basket, can I keep it?”*

This isn’t an issue! Just remember to consider the retail value and report as stated above. Also – consider sharing the gift with the team!

## Could this be you?

*“I have been invited by a business partner to what I suspect will be a fancy dinner. Can I go?”*

Yes, you should feel comfortable interacting with our partners. Just be mindful about others’ hospitality placing you in a situation where your objective judgement might be compromised.





# Fair Competition

If you have contact with competitors, e.g. through marketing, sales or purchasing responsibilities, or even through M&A activities – you need to be familiar with the principles of **competition laws**. Raise any concerns and support requests to the Legal Team.

Competition laws vary between countries but generally aim to stop arrangements that hurt competition, between competitors (so called horizontal agreements) and between parties in the commercial chain (vertical agreements) or abuse of a dominant market position.



## Do's

**1. Make independent business decisions.**

**2. Use careful language when communicating.**

Perfectly lawful conduct can become suspect because of poor choice of words.

**3. Coordinate with the Legal Team early.**

For any M&A or collaborations with competitors (“partnering” and “teaming” relationships must be structured carefully).

**4. Be on high alert during industry meetings attended by competitors.**

Stick to written agenda when meeting with them, and flag inappropriate topics (e.g. price fixing) right away in the meeting minutes and to the Legal Team.

## Don'ts

**1. Attempt to restrict resellers activities or prices.**

**2. Divide customer markets or territories with competitors.**

**3. Make public statements that are an invitation to competitors to coordinate.**

“Signalling” and “following” can be characterised as concerted action in certain contexts.

**4. Make public statements along the lines of “cornering the market” or “owning the market”.**

**5. Discuss prices, terms, production costs, expansion plan, or other competitive info with competitors.**



# ***Thank you!***

Thank you for upholding our values and  
contributing to a positive and inclusive  
environment at Podimo!

Thank you for speaking up.  
Thank you for listening.