

Supplier Code of Conduct

Asmodee Nordics is one of the entities of Asmodee being part of Embracer Group.

Embracer Group attaches great importance to ensuring that its entities and their partners share a set of common rules, practice and principles with respect to ethics, social responsibility and protection of the environment.

Consequently, Embracer Group expects its entities to establish and promote exemplary relations with all their partners (suppliers, distributors, subcontractors, etc.) anchored in responsibility, fairness and integrity.

Each Asmodee entity therefore requires its suppliers to respect the ethical principles presented in this Supplier Code of Conduct and to ensure that their own suppliers and subcontractors do the same.

In the conduct of its activities, Asmodee Nordics is committed to complying with all applicable laws, regulations and national and international conventions, as well as with best practices, in particular with regards to ethics, social responsibility and protection of the environment. Asmodee Nordics expects its suppliers to apply the same respect for applicable laws and ethics principles as they do in the management of their own companies. Asmodee Nordics requires strict compliance with these standards by all its suppliers, their workers, their production facilities, their subcontractors and their own suppliers.

When national legislation or other applicable regulations address the same issue as this Supplier Code of Conduct, the highest standards or most restrictive provisions shall apply. When this Supplier Code of Conduct is in contradiction with applicable law, the applicable law shall apply.

Asmodee Nordics works with suppliers who agree to comply with the requirements of this Supplier Code of Conduct and with moral and ethical principles and of the International Charter of Human Rights, the ten principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the labor and social standards of the International Labor Organization (ILO), and the principle of social partnership.

Our suppliers remain guarantors towards Asmodee Nordics for work performed by their subcontractors and suppliers and guarantee respect by their subcontractors and suppliers of this Supplier Code of Conduct and relevant obligations.

Asmodee Nordics expects its suppliers to have a due diligence process to identify, prevent, mitigate and account for adverse human rights.

In the event of a discovered violation of this Supplier Code of Conduct by the supplier or one of its suppliers or subcontractors, the supplier must promptly inform Asmodee Nordics.

In the event of any violation of this Supplier Code of Conduct by the supplier or one of its suppliers or subcontractors, Asmodee Nordics reserves the right to review the business

relationship and possibly terminate it in conformity with applicable law, even if there is no written contract formalizing this relationship, without prejudice to the other rights of Asmodee Nordics or remedies it might seek.

We encourage our suppliers to report alleged wrongs through the designated whistleblowing service: Tel: +45 80 88 58 12 Access code: 27663 / website: wrs.expolink.co.uk/Asmodee.

1. LABOR STANDARDS AND SOCIAL RESPONSIBILITIES

Asmodee Nordics requires its suppliers to exhibit exemplary social responsibility in their conduct.

- **Prohibition of child labor:** Work by children under the age of 16 is strictly prohibited. In countries where local laws set a higher age for child labor or set an age for completion of compulsory education higher than 16, the highest age is applicable. Any work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18.
- **Prohibition of forced labor:** Any use of forced labor, slavery, servitude or trafficking in human beings by our suppliers, as well as withholding identity papers or work permits or requiring workers to deposit a bond or the use of any other constraint, is strictly prohibited. All workers are entitled to accept or leave their employment freely. Suppliers may not require workers to work to repay a debt owed to them or to a third party.
- **Prohibition of illegal, clandestine and undeclared employment:** Our suppliers are required to comply with all applicable regulations to prevent illegal, clandestine and undeclared employment.
- **Prohibition of harassment and abuse:** We expect our suppliers to treat their workers with respect and dignity. Our suppliers may not tolerate or engage in any form of corporal punishment, physical, sexual, verbal or psychological harassment or any other kind of abuse.
- **Prohibition of discrimination:** We expect our suppliers to treat all workers equally and fairly. Our suppliers may not engage in any kind of discrimination – in particular with regards to wages (equal pay for equal work), hiring, access to training, promotion, maternity protection and dismissal – based on sex, race or ethnic origin, religion, age, disability, sexual orientation, political affiliation, union membership, nationality, gender identity or social background.
- **Wages and benefits:** Our suppliers must offer their employees fair remuneration and additional benefits based on local market conditions. Our Suppliers must at minimum pay wages on a regular basis and no less than monthly, compensate workers for overtime hours at the legal rate and meet all legal requirements relating to worker benefits. If there is no legal minimum wage or rate for overtime pay in the country concerned, the supplier must ensure that the wages are at least equal to the average minimum in the relevant industrial sector and that overtime pay is at least the same as the usual hourly compensation. Wage deductions shall not be used as a disciplinary measure. We require our suppliers to guarantee that all workers receive benefits stipulated in any applicable collective bargaining agreements, company agreements and other applicable negotiated individual or collective agreements.
- **Working hours:** Our suppliers must comply with all local laws and regulations applicable with respect to working hours, which shall not in any case exceed the maximum set by internationally recognized standards such as the International Labor Organization. Our suppliers may not impose excessive overtime hours. The total number of hours worked

per week including overtime may not exceed legal limits. Workers are entitled to the minimum number of days off established by applicable laws as well as any other applicable leave regulations such as annual, sick and parental leave, and at minimum must have at least one day off in every seven-day period.

- **Freedom of association:** We require our suppliers to respect and recognize the right of workers to negotiate collectively, and to create or join labor organizations of their choice without any sanction, discrimination or harassment.
- **Ensuring health and safety:** Our suppliers are expected to provide their workers with a safe and healthy workplace environment in order to avoid accidents or bodily injuries which may be caused by, related to, or result from their work, including during the operation of equipment or during work-related travel. Suppliers are expected to set up procedures and trainings to detect, avoid and mitigate as much as possible any hazards that constitute a risk to the health, hygiene and safety of staff. They are required to comply with all applicable local and international regulations and laws in this regard. These same principles are applicable to housing provided by suppliers.
- **Grievance System:** Our suppliers should encourage employees to report violations of this Supplier Code of Conduct and employees must have the right to report concerns regarding compliance with legal requirements or company policy/rules to their employer without fear of reprisal.

2. ENVIRONMENTAL REGULATIONS AND PROTECTION

Asmodee Nordics takes concrete measures to protect the environment within the scope of a specific program which includes cooperation with its suppliers to ensure application of best practices throughout the supply chain.

Asmodee Nordics expects its suppliers to share this commitment. It encourages initiatives by its suppliers to reduce the environmental impact of their activities, notably through the use of green technologies. We encourage our suppliers to have defined a long-term climate impact phase out roadmap as well as reduction targets and plans for its operations supplier and have active climate action program as well as a plan for climate adaptation.

Asmodee Nordics requires that its suppliers respect local and international environmental regulations and standards, that they obtain all requisite environmental permits and that they be able to prove effective implementation of the following:

- application of an environmental management system to ensure control that the business is performed in a sustainable way;
- improvements in the environmental performance of their sites and production resources, in particular through proper waste management, elimination of air, water and soil pollution, reduction of greenhouse gas emissions with an emphasis on use of renewable energies, reduction of water and energy consumption and safe management of hazardous chemicals;
- measures to preserve biodiversity and guarantee regulatory traceability and compliance for raw materials and substances used;
- best practices across their supply chain to respect animal welfare;
- contributions to continuous improvements in environmental performance throughout the lifecycle of the products of Asmodee Nordics;

- ensure that staff whose work has direct environmental impact are trained, skilled and have the resources required to effectively perform their work.

3. BUSINESS INTEGRITY REQUIREMENTS

Asmodee Nordics requires exemplary integrity from its suppliers in the conduct of their business activities.

- **Legal requirements:** We expect our suppliers to act in full compliance with local, national and international laws in the conduct of their business.
- **Prohibition of all forms of corruption:** Asmodee Nordics applies a zero-tolerance policy concerning corruption and trading in influence. We expect our suppliers to respect all applicable laws concerning corruption and to take appropriate measures to prevent, detect and sanction any corruption or trading in influence, directly or indirectly, across the scope of their activities.
- **Prevention of conflicts of interest:** We require our suppliers to comply with all applicable laws concerning conflicts of interest and to make every effort to prevent the occurrence of situations that create a conflict of interest within the scope of their business relationship with Asmodee Nordics.
- **Prohibition of money-laundering:** Money-laundering can occur where an action is taken to mask the true origin of money or assets that are connected to criminal activity. We require our suppliers to commit to taking all appropriate measures to prevent their operations from being used as vehicles for money-laundering.
- **Respect of competition:** Our suppliers must be committed to compliance with competition law applicable in their host countries. This includes prohibiting abuse of dominant position, concerted practices or unlawful agreements between competitors.
- **Confidentiality:** Our suppliers must be committed to taking all necessary measures to guarantee the confidentiality of professional secrets and other non-public information they receive in the course of their business relationship with Asmodee Nordics.
- **Prevention of insider trading:** We require our suppliers to comply with all applicable laws and legislation concerning insider trading and to refrain from selling or buying shares in Embracer Group AB, or any linked derivative financial instruments, based on inside information, either directly or indirectly.
- **Protection of personal information:** We require our suppliers to comply with all applicable laws and regulations concerning the protection of personal information. It is important that personal data is collected and processed only when it is absolutely necessary in order to perform work-related tasks.
- **Customs and security authorities:** We require our suppliers to comply with applicable customs laws, including those relating to imports and the ban on transshipment of merchandise to the importing country.
- **Trade restrictions and international sanctions:** We require our suppliers to respect international trade restrictions and sanctions, taking into account any changes in these measures, as well as all laws and regulations concerning export controls.

- **Gifts and invitations:** Gifts or invitations may be considered acceptable expressions of courtesy within the context of good business relations if limited in scope and value, given openly and transparently, permitted under applicable local law, customary in the location in which they would be given, provided to reflect esteem or gratitude, and not offered with an expectation that something will be offered in return. In some cases, these practices might be subject to anti-corruption regulations or other legal requirements, making it essential to be aware of such rules and to fully comply with them.
- **Protection of assets:** Our suppliers are required to take all necessary measures to protect the resources and assets of Asmodee Nordics, in particular its intellectual property rights, and are committed to fighting counterfeiting through a strategy of prevention, cooperation and communication. For example, all finished or semi-finished products bearing distinctive signs belonging to Asmodee Nordics and which have not been ordered or have been refused, must be destroyed by the supplier as instructed by Asmodee Nordics.
- **Public statements:** We expect our suppliers to be extremely attentive to their public statements, particularly on the Internet and in social media, and to ensure that any statements are not attributed to Asmodee Nordics, and are consistent with the supplier's commitment to both confidentiality and professional secrecy.
- **Information transparency:** Our suppliers are required to provide clear and accurate information regarding the methods and resources used, production sites and characteristics of the products or services supplied, and to refrain from making any misleading claims.

INSPECTION AND AUDIT

- **Inspection:** We reserve the right to confirm compliance with these principles and to conduct compliance audits at our suppliers and their own suppliers and subcontractors. Our suppliers must provide all necessary information and facilitate access by representatives of Asmodee Nordics seeking to verify compliance with the requirements in this Code. Suppliers must commit to improving or correcting any deficiencies identified. Asmodee Nordics may also support its suppliers in implementing and applying best practices in order to resolve minor non-conformity issues.
- **Accurate records and access to information:** Our suppliers are required to keep proper records to demonstrate compliance with this Supplier Code of Conduct. They must provide our representatives with access to complete, original and accurate records.

Date:

Name and address of supplier:

Name and position of supplier representative:

Signature: