



Ethical Sourcing and Manufacturing Policy

VERSANT Media Group, Inc. and its subsidiaries (collectively, “we”, “us”, “our”, or “VERSANT”), are committed to operating with integrity, in accordance with applicable laws and regulations, and in line with the highest standards of social and environmental responsibility. We expect the same commitment to be shared by all partners who source and/or manufacture VERSANT branded goods (“Sourcing Partners”).

We require that all Sourcing Partners comply with all applicable national and local laws and regulations, including but not limited to those related to labor, immigration, health, safety, and the environment. Accordingly, we have created this Ethical Sourcing and Manufacturing Policy (“Policy”), which sets forth the standards expected of any Sourcing Partner doing business with us. This Policy is based in part on the International Labour Organisation (ILO) fundamental conventions concerning rights at work and The United Nations Guiding Principles on Business and Human Rights. They further define VERSANT’S minimum expectations for how our Sourcing Partners will conduct themselves in their business relationships with and on behalf of VERSANT.

It is VERSANT’S expectation that our Sourcing Partners will also comply with industry standards and the VERSANT Code of Conduct for Suppliers and Business Partners. Sourcing Partners shall ensure that their own suppliers, contractors and vendors also adhere to this Policy.

At a minimum, we require that all VERSANT Sourcing Partners meet the following standards:

Child Labor

VERSANT Sourcing Partners will not use child labor. Sourcing Partner will comply with all applicable child labor laws, including those of the territory where business is conducted, and will not employ any person under the age of 15, or younger than the age for completing compulsory education in the country of manufacture (where such age is higher than 15). Workers under 18 years of age must not perform work likely to jeopardize the health or safety of young persons.

Student Worker Protections

The only potential exception to the Child Labor requirement is employment pursuant to a government-approved vocational workforce program that permits employees under 16 years to work for educational credit on the condition that they are not exposed to potential health or safety hazards. Sourcing Partners shall adhere to student worker program requirements, including proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable law and regulations.

Prevention of Involuntary Labor and Human Trafficking

All labor must be voluntary. Sourcing Partners will not use any forced, involuntary, prison, bonded or indentured labor and shall not engage in or support trafficking in human beings. Employees must be allowed to maintain control over their identity documents and have the right to leave the workplace premises after completing the standard workday.

Harassment

Each employee will be treated with respect and dignity and will not be subject to violence, punishment, or abuse.

Nondiscrimination

Sourcing Partners will employ fair practices in hiring and other employment-related practices, including but not limited to terms of employment, salary, benefits, and advancement. Termination or other employment actions on the basis of race, religion, age, nationality, social or ethnic origin, gender, political opinion, or disability are prohibited.

Freedom of Association

Employees' rights to associate, organize, and bargain collectively will be respected by the manufacturer without penalty to employees.

Health & Safety

Sourcing Partners will provide employees with a safe and healthy workplace and housing (if applicable) in compliance with all applicable laws and regulations. Sourcing Partners must take proactive measures to prevent workplace and housing hazards.

Compensation and Labor Hours

At minimum, Sourcing Partners will comply with all applicable wage and working hour laws and regulations, including those relating to minimum wages, overtime, maximum hours and other elements of compensation, and will provide legally-mandated benefits. If local law does not require overtime pay, Sourcing Partners will pay at least regular wages for overtime work. Sourcing Partners will provide employees at least one day off in every seven-day period.

Protection of Environment

Sourcing Partners will comply with all applicable environmental laws and regulations including local and national codes, and all laws related to waste disposal, air emissions, discharges, toxic substances and hazardous waste disposal.

Anti-Corruption

Sourcing Partners will not engage in corruption, extortion, embezzlement, or bribery. Sourcing Partners and any persons acting on their behalf, will not, directly or indirectly, give, offer, or authorize the offer of anything of value (such as money, gifts, business entertainment, meals, travel, discounts, jobs for relatives, charitable contributions, goods or services), regardless of the

amount of value, to a supplier, customer or government official in order to obtain any improper advantage including but not limited to actions taken to obtain government-issued licenses and permits necessary for their operations. Sourcing Partners will comply with all applicable anti-corruption laws and regulations of the countries in which they operate, the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Anti-Bribery Act, and applicable international anti-corruption conventions.

Subcontracting

At VERSANT'S request, Sourcing Partners will disclose the use of subcontractors for the manufacture and sourcing of VERSANT branded goods.

Audits, Compliance, and Corrective Actions

VERSANT expects that Sourcing Partners will establish and maintain appropriate management systems, the scope of which is consistent with the content of this Policy, and actively review, monitor and modify their management processes and business operations to ensure that their operations align with the principles set forth in this Policy. VERSANT expects that Sourcing Partners will work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Policy or an equivalent set of principles.

VERSANT reserves the right to take such actions as we deem appropriate, in our discretion, to monitor and promote adherence to this Policy, including through the unannounced inspection of facilities, review of records relating to employment, and the conduct of interviews with employees by VERSANT employees or third-party auditors. Sourcing Partners are required to maintain documentation regarding their compliance with this Policy and permit full access to facilities for inspection. Sourcing Partners are required to maintain all documentation to demonstrate compliance with this Policy, and to have a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.

Violations of this Policy may lead to VERSANT taking a range of remedial actions, including terminating the Sourcing Partner relationship. Sourcing Partners will authorize NBCUniversal and its designated partners (including third parties) to engage in audit and monitoring activities to review compliance with each element of this Code of Conduct, including but not limited to, on-site inspections of manufacturing facilities and employee housing,

Ask Questions and Report Concerns

If you have a question or concern about compliance with any provision in this Policy, we encourage you to work with your primary contact at the Company to get the answers you need to comply.

If you have a concern about potential illegal or unethical conduct in connection with your relationship with us, please report it to your contact or visit www.VersantListens.com.