# Business partner code of conduct

# Delivering excellence in everything we do

#### Message from Lara Boro, chief executive



We champion progress by enabling people and organisations to understand and navigate the most critical challenges facing them, and the world. That's the "red thread" that connects everyone at The Economist Group, driving progress for our stakeholders.

Our Business Partner Code of Conduct sets out the behaviours, practices and standards we expect to see demonstrated, all of which are based on The Economist Group's global code of business conduct and ethics, our guiding principles and our values—independence, integrity, excellence, inclusivity and openness.

By supporting this commitment, you, as our business partners, can ensure that together we are able to keep these promises and drive sustainable growth together.

We value and thank you for your partnership.

With best wishes,

Lara Boro Chief executive

### Introduction

This Business Partner Code of Conduct (the **Code**) covers a wide range of business practices and procedures and is used to guide all business partners, including suppliers, contractors, agents and any other partners or subcontractors engaged with The Economist Group (our **Business Partners**). It reflects and should be read in conjunction with our Values and our Guiding Principles. All Business Partners must conduct themselves accordingly and avoid improper behaviour. If a law conflicts with a policy in this Code, you must comply with the law; please inform us immediately should you become aware of such a conflict.

If you have any questions about the Code or how to handle a conflict, you should ask your contact at The Economist Group. If you are in a situation which you believe may violate or lead to a violation of this Code, please follow the guidelines described in the "Raising Issues" section of this Code.

#### **Compliance and monitoring**

The Economist Group reserves the right to check compliance with this Code. Where there are serious violations, or where Business Partners are not willing to address violations or where the Code is repeatedly breached, The Economist Group reserves the right to terminate the business relationship.

We expect all our Business Partners to follow the principles set out in this Code, and communicate them to any team or individual working with The Economist Group.

# Working with The Economist Group

#### Compliance with laws, rules and regulations

As an international company, we conduct business in many different markets around the world. Obeying the law, both in letter and in spirit, is the foundation on which the Group's ethical standards are built. All Business Partners must respect and obey all applicable laws within the countries in which they operate. We do not tolerate any act that violates the law.

#### **Sanctions**

All Business Partners must comply with all trade, economic and financial sanctions laws and regulations, both as part of the work and activities that they conduct for the Group and its general operations. The Group does not engage with any Business Partners that are, or are likely to be, subject to such sanctions laws. We expect all Business Partners to have adequate systems and procedures in place to identify, monitor and implement these sanctions requirements, including in respect of any sub-contractors that a Business Partner uses.

#### **Competition and fair dealing**

At The Economist Group we are committed to independence, integrity and delivering excellence in everything we do. We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Although we seek information about our competitors, stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present colleagues of other companies is prohibited. No Business Partner should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

#### **Anti-bribery policy**

In all activities Business Partners should conduct business legally and with common decency. We expect all Business Partners to follow all laws and regulatory requirements regarding bribery and corruption. Suppliers must not engage in any form of corruption, such as bribery, kickbacks, facilitation payments and extortion. This expectation applies to all our Business Partners regardless of location and regardless of how acceptable any form of inducement is in a particular place. Suppliers may not conduct business for The Economist Group that isn't compliant with the Bribery Act 2010, the Foreign Corrupt Practices Act (FCPA), or any equivalent local regulation.

#### **Conflicts of interest**

A "conflict of interest" exists when a person's private interest interferes in any way with the interests of The Economist Group. In order to conduct business in an honest and transparent way, all Business Partners must conduct business free from conflicts of interest or mitigate appropriately any such conflicts if they arise. Any potential conflict of interest should be declared with an appropriate contact at The Economist Group.

#### Modern slavery and human trafficking

Our organisation is fully committed to preventing slavery and human trafficking in its activities and to ensuring that its supply chains are likewise free from slavery and human trafficking. The use of child labour and other forms of Modern Slavery by Business Partners is strictly prohibited. Therefore all Business Partners are required to put in place reasonable measures aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

See our <u>Modern Slavery Statement</u>, to understand the steps taken by The Economist Group to prevent slavery and human trafficking.

#### **Health and safety**

We expect our Business Partners to take personal and collective responsibility to follow The Economist Group's Health and Safety guidelines. All Business Partners must establish and maintain a safe working environment, providing appropriate health and safety training, safe work and personal protective equipment for workers, in compliance with all applicable laws and regulations. Business Partners must comply with the local health, safety and security processes in place when operating in or visiting any of The Economist Group's offices, events or external locations, as part of their work with us.

#### **Record keeping**

We expect our Business Partners to be recording clear, accurate and honest information in all records they produce, such as contracts, expense reports, time worked and time off, financial statements, and public disclosure documents. All arrangements with The Economist Group should be in writing. The document should be accurate and clearly describe all information, results required, commissions or fees to be paid, how these are to be paid, the length of the agreement, and the commitment to comply with all laws and regulations. We expect all our Business Partners to be honest in their dealings with the Group and never knowingly provide false information.

# Our People, communities and environment

#### Climate and the environment

All Business Partners must comply with applicable environmental laws, regulations and standards as well as be able to demonstrate they are working towards an effective system to identify and eliminate potential hazards to the climate and environment. We expect our Business Partners to support The Economist Group's environmental targets through the products and services they deliver, for example, by measuring and providing relevant data on greenhouse gas emissions and environmental impact. In this regard, we also expect our suppliers to take climate protection into account in their own operations, for example by setting emissions reduction and environmental protection targets, and striving to achieve them.

#### **Charitable giving**

We make an active contribution to local charities by charitable trust. We encourage our Business Partners to participate in charitable and community activities.

#### **Equal opportunities and harassment**

As a Group, we hold ourselves accountable to champion a culture that fosters diversity, equity and inclusion, and are committed to equality of opportunity in all practices and policies. We do not discriminate against people based on age, sex, sexual orientation, gender reassignment, marital or civil partnership status, race, religion or belief, pregnancy and maternity, or disability. We expect our Business Partners to uphold similar high standards.

# Information security and data protection

#### Information security

The Economist Group is committed to protecting information entrusted to it, as well as physical and IT assets, through the development and implementation of information security controls. Third Parties shall use security controls that meet The Economist Group's requirements to maintain and protect information, including physical and electronic assets, obtained from The Economist Group, The Economist Group's clients and other third parties. In addition, we require notification of any potential incident that involves The Economist Group customer data (whether internally or through a partner or Supplier) as soon as possible.

#### Confidentiality

All Business Partners are required to strictly maintain the confidentiality of the Group's commercial, strategic and other information, including information in respect of our structure and organisation, products, performance, customers, users, clients and colleagues. Disclosure of any of this information must only be made in accordance with a Business Partner's contractual obligations with The Economist Group and Business Partners must inform the Group as soon as possible of any breach or loss of such information.

#### **Data privacy**

The Group collects, holds and uses the personal data of our subscribers, users, customers, clients and other groups in order to provide our products and services and the Group carries out this in a manner that maintains the high standards of trust that those individuals and groups place in the Group in accordance with our brand and history.

All Business Partners that will hold, handle or otherwise possess or receive personal data as part of their work and activities with the Group must comply with all applicable data privacy and data protection laws including, but not limited to, GDPR, in the work and activities that they conduct for the Group. Prior to being engaged, Business Partners should undertake a data privacy assessment in accordance with our procurement procedures to demonstrate that they have adequate systems and procedures in place to meet our onboarding requirements and Business Partner must continue to meet any future requirements as part of period data privacy assessments that the Group conducts.

# Raising concerns

#### Reporting any illegal or unethical behaviour

The Economist Group is committed to the highest standards of openness, honesty, accountability and corporate governance. If an individual discovers information which they believe shows malpractice within the organisation then this information should be disclosed. Lighthouse is an external, confidential service to give you the opportunity to raise concerns, whatever they may be. Lighthouse can be reached by phone using the numbers found in local handbooks, or by email on: <a href="mailto:TellEconomistGroup@GetInTouch.com">TellEconomistGroup@GetInTouch.com</a>. In the case of voice messages, an anonymised transcript of your message will be sent to us. No one at the company will hear your voice and your call will be anonymous. In the case of email messages, unless you indicate otherwise, your name and email address will be removed from the message before it is sent to us. Website: you can also submit your concern anonymously via: <a href="mailto:Syntrio:Ulluminating Corporate Integrity">Syntrio:Ulluminating Corporate Integrity</a>. Be assured that you will suffer no detriment if, having reported in the public interest and on the basis of reasonable grounds, a subsequent investigation proves that no malpractice has been committed.

