

Account of Discovery Network Norway's due diligence under the Transparency Act

Discovery Networks Norway AS ("DNN") is part of the global Warner Bros. Discovery group and a subsidiary of Warner Bros. Discovery, Inc. and fronts a wide range of TV channels as well as streaming services offered in the Norwegian market and owns and operates the TV channel "TVNorge". As per June 2023 DNN has 119 employees and has its office in Oslo. DNN's operations and organization is further described in the annual report.

Internal policies and fundamental human rights and decent working conditions for our employees

Fundamental human rights and decent working conditions is key to Warner Bros. Discovery and DNN, and respect for human rights and decent working conditions are incorporated in our Code of Ethics, internal policies, and guidelines. The Code of Ethics contains our company's standards for conducting business ethically and applies to all directors, officers, executives, and employees of Warner Bros. Discovery worldwide. Our Code of Ethics¹ is divided into four main areas which emphasize the importance of abiding by the law, acting with integrity, reporting concerns, being transparent in our business dealings, and promoting a safe and respectful workplace, including upholding human rights and being environmentally responsible. To strengthen ethics and compliance knowledge across the business, Code of Ethics online training is made mandatory for all employees of DNN.

We have implemented several measures and routines in terms of our employees' working environment, health and safety, equality, etc., and the working environment committee and union representatives have regular meetings to discuss relevant topics.

DNN complies with local employment law, respects and promotes its employee's fundamental human rights, such as but not limited to freedom of expression and freedom of association, and has a clear policy against discrimination of any kind. "Champion Inclusion" is also one of our five Guiding Principles².

DNN's internal guidelines and the employee's rights are set out in DNN's employment handbook. All employees also have access to Warner Bros. Discovery's training material and courses with a wide range of material including in relation to ethics and compliance, diversity, equity, and inclusion, and professional competence development.

Warner Bros. Discovery and DNN has an external whistleblowing channel available for all employees and business partners of DNN where actual or possible violation of any applicable law, regulation, or company policy can be reported in good faith without the risk of retaliation (wbd.ethicspoint.com).

The work on human rights and due diligence, takes place in interaction between Warner Bros. Discovery internationally and DNN locally in Norway. The day-to-day follow-up and responsibility is managed by relevant internal resources, such as within legal, finance, HR and purchasing.

¹ <https://ir.wbd.com/governance/ethics/default.aspx>

² <https://wbd.com/guiding-principles/>

Relationship with our Suppliers - Supplier screening and findings

DNN mainly buys services from its suppliers, such as, measurement data, technical support, marketing, consulting, administrative processes (such as payroll) and office rental, and as a media house operating in Norway, DNN has a limited exposure to risk of non-compliance with fundamental human rights and decent working conditions. Nevertheless, DNN has relevant due diligence routines and has incorporated several measures to ensure that we do business with responsible and ethical suppliers, including setting expectations and requirements towards our suppliers and their value chains, among others in relation to fundamental human rights and decent working conditions. We expect that our suppliers conduct business responsibly, with transparency, and in accordance with applicable laws and regulations and request our suppliers to make themselves familiar with our Business Partner Statement of Ethics³ and report any non-compliance in conjunction with the DNN – business partner relationship. Our Business Partner Statement of Ethics sets forth the standards we apply to our work and our expectations for business partners doing business with or on behalf of the company.

Warner Bros. Discovery and DNN have several tools available if additional due diligence is deemed necessary and established mitigation measures if risks are noted during the course of the business relationship.


In 2022 we updated our internal policy for routine due diligence of DNN's supplier base to identify risks that may have actual or potential negative impact on fundamental human rights and decent working conditions based on objective parameters, and DNN's footprint and leverage in relation to the same. Relevant factors in our assessment are category of services/service sector (i.e. product/industry risk), location of operations (i.e. geographical risk), our connection/leverage towards the risk and annual contract value, as well as other publicly available information. Suppliers that are identified are followed up through dialogue and information gathering. A routine background check of third-party production companies engaged in Norwegian local productions for TVNorge was also conducted in 2022. The background check covered the areas of labor, health & safety and regulatory risks, as well as bribery, corruption, sanctions, competition, ethics/litigation/adverse financial news and environmental risks. Said review and due diligence has not led to any findings of concern or need for additional follow up or mitigation measures during the past year further to our general measures.

This report is for the period of 1 July 2022 to 30 June 2023. However, we emphasize that the work on due diligence is a continuous effort.

³ <https://ir.wbd.com/governance/ethics/default.aspx>

Board of Discovery Networks Norway AS

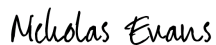
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Christina Sulebakk Khawaja
Chairperson

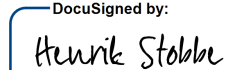
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