# MODERN SLAVERY STATEMENT

NIQ

# Introduction

Modern slavery mainly takes the form of forced labor, human trafficking, debt bondage, forced marriage, and child labor. It involves work performed involuntarily under threat, exploitation for profit or gain, and coercion through violence, deception, or abuse. Efforts to combat modern slavery require a multi-faceted approach involving various stakeholders to raise awareness, strengthen laws, improve enforcement, and support victims.

This Modern Slavery Statement is a combined statement for NIQ and GfK following the companies' combination in July 2023.

The operational structures and systems of NIQ and GfK remained distinct and separate throughout 2023. Therefore, this statement outlines the actions taken by NIQ and GfK through their established processes and systems to effectively mitigate the risks of modern slavery within their respective supply chains and operations in 2023. Specific references to "NIQ" and "GfK" in this statement relate to the legacy NIQ and the legacy GfK organizations before their combination. General references to "we", "us", or "our" refer to both NIQ and GfK, where both company's processes, practices and systems are the same or similar.

We uphold a strict, zero-tolerance policy towards all forms of modern slavery within our operations and supply chains. We have implemented controls to adhere to all pertinent laws and to maintain high ethical standards, endorsing and upholding internationally recognized human rights while actively combatting modern slavery and human trafficking within our operations and supply chains.

#### **Scope & Jurisdictions**

This statement is issued in accordance with the relevant laws and regulations that may be applicable to the legal entities listed below, and their subsidiaries:

- UK Modern Slavery Act 2015
- The French Duty of Vigilance Law
- The German Supply Chain Due Diligence Act
- The Swiss Ordinance on Due Diligence and Transparency
- The Norway Transparency Act
- The Australian Modern Slavery Act 2018

UK: A.C. Nielsen Company Limited, GfK U.K. Limited; GfK Retail and Technology UK Limited

*France*: A3 Distrib SAS, AC Nielsen SAS, Data-Impact SAS, Fox Intelligence SAS, NielsenIQ Holding France SAS, NielsenIQ Services France SAS; GfK Retail and Technology France SAS, Institut Français de Recherche-LF.R. S.A.S

Germany: NielsenIQ Services Germany GmbH, Nielsen Tele Medical GmbH, NielsenIQ (Germany) GmbH, Grace BidCo GmbH, Grace HoldCo GmbH, GfK GmbH (formerly "GfK SE"), GfK GeoMarketing GmbH, GfK Entertainment GmbH, GfK Middle East CR Holding GmbH, GfK North America Holding GmbH

Norway: ACNielsen Norge AS

Australia: Nielsen Connect Australia Pty Ltd

Switzerland: The Nielsen Company (Europe) Sàrl, NielsenIQ (Switzerland) GmbH

#### **Organizational Structure**

NIQ, established in 1923, has its corporate headquarters in the United States of America, alongside an operational headquarters in Switzerland. NIQ is a privately held entity, majority-owned from 2021 by investment funds managed by Advent International.

GfK was established in 1934 in Nuremburg, Germany. Prior to its combination with NIQ in 2023, GfK was part of the GfK Group, and its ultimate parent company was GfK GmbH. GfK GmbH has its head office in Germany.

#### Governance

NIQ and GfK use a multi-stakeholder strategy to address key human rights matters, including modern slavery and human trafficking risks. Functional areas within NIQ and GfK that provide guidance with respect to controls to support human rights commitments include Human Resources; Global Procurement; Legal, Compliance & Integrity; Crisis Management; and Diversity, Equity, and Inclusion. These functions ensure that relevant human rights risks are addressed or incorporated into existing policies or practices.

#### **NIQ Operations**

NIQ has more than 30,000 employees in over 80 countries (and operates in more than 90 countries). NIQ provides market research services, primarily to clients in the fast-moving consumer goods (FMCG) sector, consisting of retail measurement data, consumer behavior information and analytics.

GfK has more than 8,000 employees in over 50 countries (and operates in more than 60 countries). GfK provides market research and media measurement services. GfK's research data provides actionable insights to its customers, who are primarily manufacturers and retailers of tech and durable consumer goods, that influence marketing, sales, and organizational effectiveness.

The combination of NIQ and GfK expands global reach, omnichannel coverage, innovative technology with complimentary cultures.

#### **NIQ Supply Chain**

NIQ and GfK have a multi-disciplined supply chain to support us through the different aspects and provisions of our business. NIQ and GfK's supply chain consists of thousands of suppliers globally.

For both companies, the supply base is heavily weighted towards service-based providers rather than the purchase of manufactured goods. Key supply chain expense categories include data collection services, software licenses, and standard office equipment. Some of these products and services are used in NIQ operations (e.g. office equipment) and some are used as part of what we deliver to our customers (e.g. data collection services and software). Most of the manufactured goods acquired are purchased from large multinational corporations who have their own supply chain principles and ethical standards (e.g. telecoms equipment and employee laptops). For all key strategic categories of spending, global procurement follows a standard tendering approach and awards suppliers based on a multifactor scorecard including commercial, quality and compliance, sustainability, etc.

# Human rights risks in our business operations and supply chain

Considering the risks of modern slavery and human trafficking present in industries such as electronics manufacturing, some service providers, and facilities management, we recognize the difficulties arising from the lack of full visibility into our partners' internal operations and their tiered suppliers. By adhering to our policies and thorough vendor onboarding procedures, we enforce diligent controls to reduce such risks and increase adherence to standards and local laws.

### Due diligence processes to protect human rights in our operations and supply chain

Considering the risks of modern slavery and human trafficking present in industries such as electronics manufacturing, some service providers, and facilities management, we recognize the difficulties arising from the lack of full visibility into our partners' internal operations and their tiered suppliers. By adhering to our policies and vendor onboarding procedures, we enforce diligent controls to reduce such risks and increase adherence to standards and local laws.

#### A. Policies and practices to protect human rights

We have implemented various measures to identify potential human rights risks, including modern slavery and human trafficking, in our business and supply chains.

We follow the recommendations set forth in recognized external standards, including the UN Guiding Principles on Business and Human Rights, built on the UN Universal Declaration of Human Rights; the International Labour Organization (ILO) Conventions; European Convention on Human Rights; and the human rights related recommendations set forth in the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. NIQ's alignment with these principles covers human rights risks related, inter alia, to the following areas: discrimination, harassment, retaliation, excessive or forced labor, child labor, appropriate compensation and minimum living wages aligned with ILO conventions, safe working conditions, and slavery and human trafficking.

We demonstrate our commitment to human rights and the fair treatment of workers by having local policies and practices that prohibit human rights violations internally and in the supply chain, particularly regarding involuntary labor, human trafficking, and unacceptable work conditions, including but not limited to, conditions relating to pay, working hours and working environment.

This commitment is further outlined in NIQ's <u>Code of Conduct</u>, NIQ's <u>Supplier Code of Conduct</u>, and the <u>Human Rights Policy</u>. These policies can be found on the <u>NIQ website</u>, on the "<u>About</u>" page, under the "<u>Our Policies</u>" section. Additionally, NIQ manages its environmental, social and governance risks (ESG) across the business and more information can be found on the <u>NIQ website</u>, on the "<u>About</u>" page, under the "<u>ESG Reporting</u>" section. GfK is also committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. The <u>GfK Code of Conduct</u> and <u>Code of Conduct for GfK Suppliers</u> reflect the commitment to acting ethically and with integrity in all business relationships.

#### Human rights risks in cooperation with representatives of relevant trade unions in France

Annually, "le Document unique d'évaluation des risques professionnels" is reviewed in consultation with trade union representatives and the local works council and the document is updated by the Health, Safety and Working conditions committee. Human rights risks are identified at a local level and appropriate solutions are documented and executed throughout the year.

#### B. Enterprise Risk Management

Managing human capital, including modern slavery risks, is embedded in our overall approach to risk management. All business risks are managed through our Enterprise Risk Management process, where key business risks are identified based on the potential likelihood and magnitude of impact on the business operations. A functional risk owner is then assigned to create acceptable controls and tolerances to effectively manage those risks. Progress against risk mitigation is reviewed with the Audit Committee of the Board of Directors of the company. Human capital, including human rights risk management, is also a regular topic of discussion among senior leadership.

#### C. Supplier onboarding process

Prior to onboarding a supplier, we establish a baseline of expectations regarding social and human rights compliance through the Supplier Code of Conduct principles and ethical standards, which new vendors must acknowledge before transacting with NIQ.

#### D. Training

As it relates to employee engagement on human rights-related issues, both the Code of Conduct and the Supplier Code of Conduct establish guidelines and expectations for lawful and ethical conduct by NIQ and GfK representatives around the world. All employees are required to be vigilant in protecting against exploitation of vulnerable populations, human trafficking and child and forced labor. The NIQ Code of Conduct is available in 38 languages\* and the GfK Code of Conduct is available in 15 languages. Our employees periodically complete training related to the principles of the Code of Conduct and regularly reaffirm their commitment to the principles set forth in the Code.

# Effectiveness in protecting human rights across the business and supply chain

We take actions to address human rights risks in our business operations or supply chain.

#### \* Except where not appropriate due to local law.

#### NIQ KPI's for 2023:

- Deliver Code of Conduct training to NIQ and GfK employees across all geographical locations and business functions.
- All new suppliers engaging with us are required to acknowledge the Supplier Code of Conduct, which includes the protection of the human rights of all workers in the suppliers' businesses.

#### **Grievance Mechanisms**

We maintain a reporting hotline where employees can confidentially and anonymously report any misconduct or concerns, including any issue that may be related to human rights. For NIQ, this can be <u>found here</u>, and for GfK, the reporting hotline can be <u>found here</u>. We also maintain whistleblowing policies to ensure a proper framework is set up to raise concerns.

Periodically, our employees complete mandatory training on the company Code of Conduct and whistleblowing practices, which provides step-by-step guidance on how to raise concerns on the hotline and the several other identified reporting methods.

#### **Next Steps**

Following a review of the effectiveness of the steps we have taken to mitigate modern slavery and human trafficking risks in our operations and supply chains, we intend to continue to take steps to combat it including, but not limited to:

- Introduce a more robust framework around our supply chain.
- Continue to transparently report on our internal practices for recruitment and people management through our annual ESG report.
- Encourage the reporting of concerns and the protection of whistle blowers.
- Introduce targeted training by 2025, to help strengthen the identification and mitigation of human rights risks in the operations and supply chain, including modern slavery and human trafficking risks.
- Continue to maintain and uphold our zero-tolerance policy on modern slavery risks.

# **Consultation & Approvals**

This statement was prepared through consultation with a team of representatives across multiple functions as mentioned under the Governance section above, which included legal counsel from the reporting entities to this statement. The statement was also reviewed by the Chief Legal Officer for the year ending December 2023 and is presented to the relevant governing boards of the various NIQ and GfK legal entities as noted above.

Signed for and on behalf of NIQ and GfK

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John Blenke

Chief Legal Officer

Date: 30 June 2024