

Account of Discovery Networks Norway’s due diligence under the Transparency Act

At Warner Bros. Discovery (WBD), we are committed to telling stories that reflect the full range of human experiences and shaping our culture in a meaningful way. This commitment extends to Discovery Networks Norway AS (“DNN”), part of the global WBD group. DNN, a subsidiary of WBD, operates the TV channel ‘TVNorge’ and provides a range of services to other channels and platforms within the WBD group of companies operating in the Norwegian market. As of June 2024, DNN has 114 employees based in Oslo.

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

At WBD and DNN, we believe that everyone has the right to dignity and respect. We stand firmly against all forms of modern slavery, human trafficking, unlawful child labor, and forced labor. This zero-tolerance approach is embedded in our operations and reflected in our commitment to ethical conduct across all business relationships. Respect for human rights and decent working conditions are core principles incorporated in our Code of Ethics, internal policies, and guidelines. Our [Code of Ethics](#)¹ 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 mandatory for all employees of DNN.

We have implemented several measures and routines concerning our employees' working environment, health and safety, equality, and more. These include various physical and mental health initiatives and comprehensive health insurance for all employees. Additionally, the working environment committee and union representatives hold regular meetings to discuss relevant topics.

DNN complies with local employment laws, respects and promotes its employees’ 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 Principles](#)².

DNN’s internal guidelines and employees' rights are detailed in DNN’s employment handbook. In addition, WBD has recently consolidated its ethical policies across its group of companies into a comprehensive Code of Ethics, reflecting our commitment to uphold the highest standards of ethical conduct across all operations. These policies emphasize non-discrimination, respect for human rights, and environmental responsibility, and apply to all WBD entities and their business partners globally.

All employees also have access to WBD’s extensive training materials and courses, which include modules on ethics, compliance, diversity, equity, inclusion, and professional development.

WBD and DNN maintain a robust external whistleblowing channel available for all employees and business partners, allowing concerns about any potential violations to be reported confidentially and without fear of retaliation. This channel, part of our comprehensive Ethics Hotline system, is publicly accessible in local languages and supports anonymous reporting.

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

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

The work on human rights and due diligence takes place through interaction between WBD 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, ethics & compliance, HR and purchasing.

Relationship with our Suppliers - Supplier screening and findings

DNN primarily 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 conducts thorough due diligence to ensure we partner with responsible and ethical suppliers. We expect our suppliers to conduct business responsibly, with transparency, and in accordance with applicable laws and regulations. We request that our suppliers familiarize themselves with our [Business Partner Statement of Ethics](#)³ 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.

WBD also conducts due diligence and continuous monitoring on many of its higher risk business partners using a third-party tool that: (i) scans global media outlets for negative press involving the entity or its owners and principals, including those related to human rights and labor issues; (ii) analyzes civil and criminal enforcement actions or litigation involving the entity and its owners or principals; (iii) reviews the entity name and ownership structure against multiple economic sanctions regimes; and (iv) identifies connections between governments and the entity, its owners or principals. WBD and DNN have several tools available for additional due diligence if 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 local supplier base to identify risks that may have an 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 identified as having risks 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.

In 2023, we revisited our background checks and due diligence reviews to determine if there were new suppliers that warranted assessment. We followed the same procedure and identified no red flags for further follow-up, affirming our commitment to maintaining a responsible and ethical supply chain.

In addition to this, we also carried out routine background checks of 3rd party distributors during 2023/2024, which did not lead to any findings of concern or the need for additional follow-up or mitigation measures beyond our general procedures.

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

This report covers the period from 1 July 2023 to 30 June 2024. However, we emphasize that the work on due diligence is a continuous effort.

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