

# NIELSEN'S GLOBAL COMMITMENT TO HUMAN RIGHTS

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Throughout Nielsen's more than 90-year history, we've remained dedicated to the highest standard of respect for human rights by operating responsibly and sustainably across the globe. We recognize that it is critical for all companies to respect human rights wherever they operate. As the world's leading measurement company, Nielsen fuses science and data to help clients understand what's happening today and what will happen next. And with that comes a particular responsibility to act as a steward of the consumer data and information that we use to power our business.

Our commitment to civil liberties extends across the clients we proudly serve, the communities in which we live and work, the employees who serve our clients, the consumers who share their information with us and a supply chain that supports our work. We champion inclusion, while respecting diversity and the laws of the countries in which we operate; we expect the same from our business partners, subsidiaries, joint ventures, suppliers, clients, and employees.

We recognize that the vitality of a business is closely linked to the health of the markets in which it operates, and we continue to believe that it is critical for us to care for the people and communities we rely on to operate our business. This belief provides the foundation for our commitment to human rights, as well as for Nielsen's overall commitment to Global Responsibility & Sustainability. We work together across all functions and teams to ensure that we fulfill our enduring commitments to all of our various stakeholder groups through the sound management and monitoring of our company, operations and relationships with external groups like our suppliers, clients, and business partners. Nielsen broadly defines our stakeholder groups as: our employees, clients, investors, suppliers, business partners, the physical environments and communities in which we live and work, and the consumers who share data with us.

To operationalize this commitment internally, Nielsen relies on input and guidance from associates across the company. Internally, we work to take action on any environmental, social, governance (ESG)-related risks, challenges and opportunities through regular convenings of cross-functional leaders, including through our Human Resources (HR)

Sustainability Council and our Technology/Operations Sustainability Council, among other groups. Oversight over all Responsibility & Sustainability matters, including human rights, resides with our Board of Directors, specifically within the [Nomination and Corporate Governance Committee](#). This commitment to human rights applies to all of us at Nielsen, and includes our ultimate parent company, Nielsen Holdings plc, as well as its subsidiaries and affiliates controlled by us. It also applies equally to the members of our Board, our senior officers, every employee (whether full- or part-time), and individual independent contractors who are engaged directly by Nielsen to perform services for the Company.

We are committed to maintaining open lines of communication with all stakeholders relating to human rights-related issues. We invite any stakeholders concerned about potential human rights-related risks or impacts to reach out and share any concerns or grievances with us. To that end, the Nielsen Integrity Helpline is available for any human rights-related questions or concerns. Please visit [www.nielsen.com/helpline](http://www.nielsen.com/helpline) to make a report online, and to view a full list of country-specific phone numbers. More information about how to submit a claim through the Helpline and other ways to report a concern can be found in the [Nielsen Code of Conduct](#).

We are committed to regularly sharing updates with our stakeholders and the general public on our approach to addressing human rights-related risks and opportunities across our business and supply chain, through resources such as our [Nielsen Global Responsibility Report](#) and regular communications via [our website](#).

## OUR APPROACH

Nielsen was founded on the principles of integrity, honesty, fairness, respect and reliability. These founding principles are aligned with the commitment to respect human rights as set out in the United Nations (UN) Guiding Principles on Business and Human Rights, built on the UN Universal Declaration of Human Rights, the International Labor Organization (ILO) Conventions, and the human rights-related recommendations set forth in the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. The overarching definition of human rights set out in the UN Universal Declaration on Human Rights recognizes that human rights are basic, universal rights that form the foundation for freedom, justice and peace in the world, and apply equally in all countries. Nielsen's alignment with these principles covers human rights risks related to—but not limited to—the following areas: discrimination, harassment, 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 are mindful that our approach to human rights is based on many dynamic factors, such as stakeholder needs, industry best practices, expansion to new markets, and changing social, economic and political landscapes within the markets where we operate. As such, we are committed to reviewing this and other policies on a regular basis to ensure our approach is aligned with changing needs. Beyond the positive impact we seek to make, we are continuously seeking new and improved ways to avoid directly or indirectly causing or contributing to adverse human rights impacts.

All Nielsen leaders are responsible for ensuring our practices demonstrate a commitment to human rights. Functional responsibility for managing, monitoring and tracking the potential human rights impacts and risks of our business and operations is managed across a variety of functions, including: Procurement, Operations, Corporate Audit, Human Resources, Diversity & Inclusion, Global Responsibility & Sustainability, Legal & Corporate Affairs, Finance, and others. Each functional group contributes its own unique expertise and competencies to ensuring that relevant human rights risks are addressed or incorporated into existing policies or practices if and as needed.

One such functional group with responsibility in this area is our Integrity Leader program, which is composed of regional Integrity Leaders and Integrity Ambassadors throughout the organization. The Integrity Ambassador program was formally launched in 2017. Among other functions, Integrity Leaders are available to all associates to confidentially report any misconduct or concerns related to any aspect of the company, including anything that may be related to human rights. In the normal course of their work, Integrity Leaders and Integrity Ambassadors may use information relevant to human rights-related issues to drive awareness throughout the organization and to mitigate risk in this area.

Human rights is also embedded in our overall approach to [Risk Management](#) through our Enterprise Risk Management (ERM) framework. This multi-channel collaboration allows us to take a more comprehensive and proactive approach to human rights risk management. ERM ensures that we are conducting ongoing, in-depth assessments through our existing due diligence processes, monitoring and reporting on these risks, taking appropriate actions when needed to address the risks, and integrating any relevant findings into our organizational processes and policies as needed. We also monitor human rights-related risks on an ongoing basis through a variety of other internal audit processes across geographies and different areas of our business. As such, Nielsen's Global Audit and Compliance team is responsible for tracking and assisting with the remediation of control deficiencies through its wide-ranging and ongoing audit processes. We continually review, and update as needed, our internal audit questionnaire to ensure we cover all aspects of human rights that are material to our business.

We recognize that monitoring human rights risks is critical for all stakeholder groups, but that not all groups require the same type or degree of monitoring, resources and support. With that in mind, we have identified key vulnerable groups that require more rigorous monitoring, including manufacturing suppliers, panelists, and remote workers—for the latter group, it is particularly important to monitor those who perform their job responsibilities in the field. Nielsen is continually revising our approach to providing these groups and others with the resources and information they need to recognize and address potential human rights risks or opportunities that might come up in the course of their work or interactions with Nielsen.

To operationalize our commitment to human rights, we proactively engage our internal and external stakeholders to better understand their views and recommendations in order to incorporate an informed respect for human rights throughout all aspects of Nielsen's business. Our approach is aligned with external standards and best practices in a number of specific ways, including:

### **RESPECT FOR THE INDIVIDUAL**

- No matter if it is the Nielsen panelist whose data we collect, the employee whose work propels our organization forward or any number of other people with whom we come into contact every day, we are dedicated to ensuring that Nielsen is a place where individuals feel included, respected, and comfortable being themselves.

### **CARE FOR OUR COMMUNITIES**

- We strive to make a difference in each of the communities where we live and work around the world, both through our work with clients and suppliers, as well as through the pro bono delivery of data and insights to meet unique nonprofit needs.

### **NURTURE A DIVERSE AND INCLUSIVE ENVIRONMENT**

- Our global commitment to [Diversity and Inclusion](#) is a business imperative. Nielsen is committed to ensuring our practices of non-discrimination and inclusion of people of different backgrounds, experiences and perspectives extends across the globe. We oppose discrimination on grounds including but not limited to those based on nationality, ethnicity, citizenship, religion, race, color, gender, gender identity or expression, age, physical or mental disability, class, caste, caregiver status, marital status and sexual orientation. Diversity makes our company and our business stronger and we will continue our longstanding efforts to recruit and retain a workforce that reflects the communities where we live and work.

## **SAFEGUARD OUR MERITOCRACY**

- We are dedicated to ensuring that Nielsen remains a place where associates can grow along with us and where we each have the ability to reach our full potential. Nielsen is focused on providing equal opportunities through employment. To that end, we have committed to the continued growth of our associates' personal and professional skills in a fair and unbiased way, providing ample opportunities through training and development for all associates.

## **SUPPORT FREEDOM OF EXPRESSION**

- We recognize that it is a right of everyone to associate freely. We are committed to ensuring an open environment at Nielsen where all views are respected and dialogue about our business and its operations is encouraged.

## **CREATE PRODUCTIVE WORKING CONDITIONS**

- Nielsen remains committed to creating a productive and safe working environment for all associates, consistent with all applicable laws and regulations and with regard to local customs and needed accommodations. This includes but is not limited to accommodations for associates with disabilities; working environments free from harassment and discrimination; and clear protocols and resources for associates to speak up as needed about workplace issues.

## **MAINTAIN THE SAFETY AND SECURITY OF OUR ASSOCIATES AND OFFICES**

- Our global security team, led by our Chief Security Officer, is committed to ensuring the safety and security of our associates and offices across the more than 100 countries in which we operate. Our approach is aligned with the Voluntary Principles for Security and Human Rights, including the use of risk assessments that incorporate a local or regional understanding of potential human rights-related risks alongside any relevant prevention or mitigation actions. The Global Security team liaises with private and public sector entities as well as with external stakeholder groups to obtain actionable insights about new and evolving political and economic risks.

## ENSURE APPROPRIATE PAY AND BENEFITS

- Nielsen remains committed to providing appropriate pay and benefits for all associates, commensurate with the work being performed and consistent with applicable laws and regulations. We regularly review our compensation practices to ensure that they are equitable and support our culture of meritocracy. We are committed to ensuring that all employees are, at a minimum, paid a fair and living wage, and that no discriminatory pay practices are used. In addition, both in accordance with local laws and regulations as well as with our commitment to maintaining a positive work culture, we are committed to ensuring that no employees are forced to work excessive hours outside of local norms.

## UPHOLD HIGH ETHICAL STANDARDS

- Through initiatives like our Compliance & Integrity program and client partner programs, Nielsen remains committed to upholding high ethical standards and creating an environment in which all associates and stakeholders are enabled to raise ethical concerns without fear of reprisal.

## MAINTAIN A SUSTAINABLE AND INCLUSIVE SUPPLY CHAIN

- Nielsen is committed to the highest standards of integrity and social responsibility. To ensure that these standards are achieved by the third parties we do business with, our [Supplier Code of Conduct](#) sets out general requirements applicable to all Nielsen suppliers. Detail regarding our approach to addressing potential human rights-related risks and opportunities in our supply chain are detailed there. As one example of how this is applied to our supply chain, Nielsen is focused on pursuing impact sourcing opportunities to build and maintain an inclusive workforce; we encourage the same of our suppliers. Nielsen is an active member of the Sustainable Purchasing Leadership Council (SPLC), the Responsible Business Alliance, the Global Impact Sourcing Coalition (GISC), the National Minority Supplier Development Council, the Women's Business Enterprise Network Council, and other groups that focus on human rights-related and other concerns in the area of supply chain sustainability.

# COMMITMENT TO COLLABORATION

We know that we succeed as a company when we invest in our people, resources, and communities. To ensure our continued sustainability as a business and as a responsible corporate citizen, we seek to collaborate with our key internal and external stakeholder groups to fully deliver on our commitment to respect human rights across all of our global operations. Some of the stakeholder groups that we regularly collaborate with include:

## EMPLOYEES

- Our clients and everyone with whom we do business have come to expect that Nielsen's founding principles of integrity, honesty, fairness, respect and reliability will continue to guide everything that we do. Our clients depend on our word to value their products and services, and this is both a great honor and responsibility for all of us. Nielsen is committed to having its employees live up to the highest standards of ethics in everything they do in the name of Nielsen, which includes respecting human rights everywhere. More information can be found in [Nielsen's Code of Conduct](#). At Nielsen, we are committed to providing an environment where our employees can be themselves, make a difference and grow with us.

## CLIENTS

- Nielsen is honored to serve our many clients around the world, many of whom are global and local leaders in both business and citizenship. We remain committed to ensuring that human rights are always respected in every aspect of our business dealings with clients.

## COMMUNITIES

- Nielsen is dedicated to working with community organizations, nonprofits and charitable organizations, local governments and others to ensure that we continue to operate responsibly both as a corporate citizen and through our measurement of consumers in diverse communities around the world. We strive to make an uncommon impact on the communities in which we live and work by leveraging our insights, involvement and investment through pro bono work and the in-kind giving of data and insights to nonprofits in key priority cause areas.



## SUPPLY CHAIN

- Nielsen expects that the suppliers with which we do business support and respect the free exercise of human rights, including through compliance with applicable human rights and labor laws and the provision of safe and healthy working environments. We screen all of our vendors that register through our core accounting systems for corruption and sanctions. Forced and involuntary or child labor are strictly forbidden. In complying with all applicable labor laws, we expect all suppliers to uphold our Nielsen values through the delivery of their services and to conform to the expectations set forth in our [Supplier Code of Conduct](#). Our Global Procurement organization works to ensure supplier compliance with our human rights policies through oversight that involves planning, monitoring, measurement, corrective action, auditing, review and reporting. We are committed to addressing issues of noncompliance with human rights and worker safety norms, among other topics, through collaborative and corrective action with suppliers and global multi-stakeholder collaborations. In order to assess our suppliers' performance when it comes to their respect for human rights, we engage in a three-step process:
  - Third-party environmental, social and governance (ESG) assessment, providing an independent evaluation of suppliers' policies and practices as it relates to labor and human rights, among other topics;
  - Audit questionnaire specific to the Responsible Business Alliance (formerly known as the Electronic Industry Citizenship Coalition, or EICC), which includes questions on migrant labor; recruitment practices; use of agents; recruitment and related fees; worker identification and documentation; and freedom of movement;
  - Review of the Responsible Business Alliance database to evaluate any audited findings that are available for individual suppliers.

## CONSUMERS

- We value the privacy of consumers who share their data and information with us, and we place a premium on operating as a company that consumers can trust. Within this commitment, we ensure that data from children who are included in our consumer measurement panels is only used where parents have consented, including as it relates to the privacy and security of their information. For more information, please refer to [Nielsen's Privacy Principles](#).

One way we demonstrate our commitment to regular stakeholder engagement is through external transparency about our efforts. These efforts include our [non-financial materiality assessment process](#), and our regular public reporting on our Global Responsibility & Sustainability progress related to our overall business strategy, and across all relevant environmental, social, and governance (ESG) areas. We also publish a Diversity & Inclusion Annual Report to outline our efforts to reflect the changing demographics globally while sharing insights and data with both clients and communities at large.

We will continue to explore new ways of furthering our commitment to human rights around the world through these and other stakeholder engagement efforts. We commit to ongoing and regular engagement of our internal and external stakeholders and to incorporate their views and recommendations into our global policies and practices.

## ABOUT NIELSEN

Nielsen Holdings plc (NYSE: NLSN) is a global measurement and data analytics company that provides the most complete and trusted view available of consumers and markets worldwide. Our approach marries proprietary Nielsen data with other data sources to help clients around the world understand what's happening now, what's happening next, and how to best act on this knowledge. For more than 90 years Nielsen has provided data and analytics based on scientific rigor and innovation, continually developing new ways to answer the most important questions facing the media, advertising, retail and fast-moving consumer goods industries. An S&P 500 company, Nielsen has operations in over 100 countries, covering more than 90% of the world's population. For more information, visit [www.nielsen.com](http://www.nielsen.com).





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