



## **Ziff Davis Human Rights Policy**

(Last revised March 2021)

At Ziff Davis, we are committed to respecting and promoting all forms of human rights — civil, cultural, economic, political and social —paying special consideration to protection of the rights of women and minority groups, and to the right to privacy and freedom of expression. We are committed to doing so in every aspect of our operations, for all of our subsidiaries, in every location in which we operate.

We believe we can do so not only through our own policies, and the policies we require of our vendors, but also through the technology we develop and provide, such as VPN services that help facilitate freedom of expression and freedom of speech that may otherwise be censored.

We aim to achieve our commitments specifically through:

**Our technologies:** We believe the technologies we provide can help foster respect for human rights. For example, our Fax and Voice technologies promote the flow of information and empower people to work together to further respect for human rights. Our VPN technology helps to promote human rights by enabling freedom of expression, free speech and disclosure of possible human rights violations everywhere, including within regions where human rights are challenged. We will continue developing services that we believe help promote human rights throughout the world.

**Our employees:** We incorporate respect for human rights into our employment policies--including our policies on anti-discrimination and anti-harassment--and into our code of ethics. Our policies specifically prohibit discrimination or harassment by employees on the basis of race, religion, sex or gender identity, which we consider important to the protection of women's rights and the rights of minorities. We aim to ensure compliance with these policies through onboarding and regular training. We also seek to promote the general well-being of our employees through a variety of benefits we offer related to health, mental and physical wellness and family leave.

**Our vendors:** We expect our vendors to support our beliefs and commitments to human rights by abiding by our Vendor Policy and Code of Conduct, which requires our vendors to substantially comply with, or adopt substantially similar policies to, our Human Rights Policy, including with respect to prohibitions on forced labor, exploitative practices, human trafficking and modern slavery.

**Our stakeholders:** As a public company, we also value input from our stakeholders on human rights issues, from the development and implementation of our policies on human rights to assessment of how effective our policies are.

**Our practices regarding government demands:** We aim to act as a partner with law enforcement to protect the rights and safety of individuals. At the same time, when we receive requests from law enforcement or governments regarding our users' data, we seek to ensure the request is legitimate and to act as consistently as possible with our approach to respecting human rights.

**Guiding principles and international norms:** We aim to conform with the UN Declaration on

Human Rights, OECD Guidelines for Multinational Enterprises, and UN Guiding Principles on Human Rights.



- **Engagement:** We seek to engage our employees, vendors, stakeholders and customers on human rights issues, and to be involved in public policy discussions about how the technologies we offer can better promote human rights. We also consider the need for security arrangements on an as-needed basis. Please contact [legal@ziffdavis.com](mailto:legal@ziffdavis.com) for additional information.
- **Transparency:** We seek to be transparent about what our policies are and about our commitment to promoting their goals. We seek to communicate the work we are doing to promote human rights through our Corporate Responsibility website.
- **Accountability:** We seek to be accountable for our commitments to human rights. We provide a whistleblower hotline (1-(855) 883-2425) that is closely monitored and can be used to formally report grievances to the company pertaining to human rights. Internal complaints pertaining to human rights may also be reported to Human Resources, as detailed within Ziff Davis' Corporate Policies and Practices. Our entire company, from our Board of Directors to each employee, is charged with helping to ensure we hold ourselves accountable to our policies on human rights.

Ziff Davis undertakes these commitments across all of its brands and subsidiaries, in connection with the company's business, strategy and financial planning. Ziff Davis' Board of Directors and management are charged with maintaining these commitments.