



# Nielsen's global commitment to human rights



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Throughout Nielsen's over 100-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 and promote human rights wherever they operate. As a global measurement and data analytics company, Nielsen provides the most complete and trusted view of audiences worldwide. And with that trust comes a particular responsibility to ensure high standards for the treatment of all people who power our business.

Our commitment to human rights 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 of all people, while respecting 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 believe that it is our obligation to care for the people and communities Nielsen relies on around the globe. This belief provides the foundation for our commitment to human rights, as well as for Nielsen's overall commitment to global responsibility and sustainability. We work together across all functions and teams to fulfill our enduring commitments to 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, regulators and policy makers, the physical environments and communities (including nonprofits/nongovernmental organizations) in which we live and work, industry associations and research institutions, and the panelists who share data with us.

To operationalize this commitment internally, Nielsen relies on input and guidance from our people across the company. Internally, we work to act on environmental, social and governance (ESG)-related risks, challenges and opportunities through regular convenings of cross-functional leaders. This commitment to human rights applies to all of us at Nielsen, including members of our Board, our senior officers, every employee (whether full- or part-time), independent contractors and contingent workers who are engaged by Nielsen.



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 to handle human rights-related questions or concerns. Stakeholders, both internal and external, may visit [www.nielsenintegrity.ethicspoint.com](http://www.nielsenintegrity.ethicspoint.com) or use the QR code below to make a report online or via telephone.



# 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 UN's Declaration 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, ethical recruiting, appropriate compensation and minimum living wages aligned with the ILO Declaration on Fundamental Principles and Rights at Work, and safe working conditions, as well as anti-slavery, prison labor and anti-human trafficking. Accordingly, we comply with all applicable laws and regulations.

We are mindful that our approach to human rights is based on dynamic factors, such as stakeholder needs, industry best practices, regulatory and legislative changes, expansion to new markets, and social, economic and political landscapes within the markets where we operate. As such, we are committed to reviewing this and other policies regularly to ensure our approach is aligned with changing external needs as well as internal changes to our business.

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, Legal and Business Affairs, Communications, Finance, Corporate Citizenship and Business Inclusion, Impact and Belonging. Each functional group contributes unique expertise and competencies to ensure that human rights risks are appropriately addressed.

Our global Compliance and Integrity program is dedicated to ensuring legal and ethical behavior across Nielsen—from the Senior Management through to the most junior employees. While all employees must uphold our high ethical standards, functional responsibility for managing our Compliance and Integrity efforts sits with our Global Head of Compliance and Integrity within our Legal and Business Affairs team, reporting directly to our Chief Legal and Business Affairs Officer and with oversight from the Board. Our Employee Relations and Human Resources teams, along with Integrity Leaders, are also available to assist employees in issues that require escalation, including discrimination, harassment, bullying, Code of Conduct violations and concerns around Performance Improvement Plans. Integrity Leaders serve as “diplomats” of integrity to our employees, answering questions about doing the right thing, and spreading the word about how to raise a concern when something doesn't seem right. Compliance & Integrity, Integrity Leaders, Employee Relations and Human Resources Business Partners (HRBPs) are available to all employees to confidentially report any misconduct or concerns related to any aspect of the company, including any issue that may be related to human rights. In the normal course of their work, Compliance & Integrity, Employee Relations and HRBPs will 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 through a “Health, Safety and Human Rights” risk category. 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 regular assessments and consistently monitor and report on these risks to senior leadership. We also monitor human rights-related risks on an ongoing basis through a variety of other internal processes across geographies and different areas of 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 stakeholder groups that require more rigorous monitoring, including manufacturing suppliers, panelists and employees who perform their responsibilities in the field (not in a Nielsen office or home office setting). Nielsen is continually revising our approach to provide 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 to incorporate an informed respect for human rights throughout all aspects of Nielsen's business. Our approach, aligned with external standards and best practices, includes the following components:

## 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 safe, included, respected and comfortable being themselves.

## Care for our environment and our communities

- We strive to make a difference in the communities and environments where we live and work around the world, both through our work with clients and suppliers, as well as through hands-on community projects and the pro bono delivery of data and insights to meet unique nonprofit needs. With changes to our physical offices globally, Nielsen remains committed to avoiding directly or indirectly contributing to human rights violations related to land, forest and/or water rights and forced eviction.

## Nurture an inclusive environment

- Our continued global commitment to [Business Inclusion, Impact and Belonging](#) is a business imperative. Nielsen is committed to ensuring our practices of non-discrimination and inclusion of people of all experiences and perspectives extend across the globe. Nielsen is committed to maintaining a workplace that is free of all forms of harassment and discrimination. Our global non-discrimination policy covers protected classes in every market in which we do business worldwide. Inclusion of all people makes our company and our business stronger, and we will continue our longstanding efforts to grow 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 employees 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 are committed to fostering the continued growth of our employees' personal and professional skills in a fair and unbiased way, providing ample opportunities through training and development for all our people.

## 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, consistent with our global non-discrimination policy and Code of Conduct, 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 employees across the geographies in which we operate, 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 employees with disabilities, working environments free from harassment and discrimination, and clear protocols and resources for employees to speak up as needed about workplace issues.

## Maintain the safety and security of our employees and offices

- Our Security and Facilities teams are committed to ensuring the safety and security of our employees in our offices, in the field or working remotely across the more than 45 countries in which we operate. The Security team liaises with private and public sector entities and with internal and external stakeholder groups to obtain actionable insights about new and evolving geopolitical, economic and health risks. Nielsen develops and maintains processes to address potential issues of workplace health and safety for employees. Nielsen also collaborates with external partners to ensure that any private or public security forces that we work with are following best practices for human rights compliance.

## Ethical recruiting

- Nielsen is committed to ethical recruiting, especially as we expand operations in different markets. We conduct regular audits of our hiring processes to ensure compliance with our ethical guidelines and to identify opportunities for improvement.

## Ensure appropriate pay and benefits

- As we grow across global markets, Nielsen remains committed to providing appropriate pay and benefits for all employees, commensurate with the work being performed and consistent with applicable laws and regulations. Pay equity is fundamental to our compensation philosophy and practices. We have robust employee data globally, and we ensure that our pay outcomes reflect our commitment to pay equity and are unbiased and support our culture of meritocracy. We are committed to ensuring that all employees are, at a minimum, paid a fair and living wage aligned with local markets. In addition, in accordance with local laws and regulations as well as with our commitment to International Labor Organization (ILO) standards and to maintain 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 led by our Compliance & Integrity program and client partner programs, Nielsen remains committed to upholding high ethical standards and creating an environment in which all employees and stakeholders are enabled to raise concerns without fear of reprisal or retaliation.

## **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. Details regarding our approach to addressing potential human rights-related risks and opportunities in our supply chain can be found in the Supplier Code of Conduct. 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 and other groups that focus on human rights-related and other concerns in the area of supply chain sustainability.

# Commitment to collaboration

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

- Nielsen is committed to holding its employees to the highest ethical standards in everything they do in the name of Nielsen, which includes respecting human rights everywhere. 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 we do globally. Our clients depend on our word to value their products and services, which is not only an honor but a great responsibility. More information can be found in Nielsen's Code of Conduct. We require Nielsen's Board and all employees (except where not permitted by local laws) to annually certify that they understand and will abide by our Code of Conduct. These principles and requirements are also communicated to new hires through our onboarding processes, with required Code of Conduct certification for new hires within the first 30 days of their date of hire.

## Clients

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

## Communities and environment

- Nielsen is dedicated to working with community organizations, nonprofits and charitable organizations, local governments and others to ensure we continue to operate responsibly, both as a corporate citizen and through our audience measurement, in communities around the world. Through responsible, sustainable business practices and our commitment to giving back with volunteering and pro bono projects, we care for the communities and markets where we live and operate our business.

## Government officials

- When necessary and in compliance with all applicable laws, we advocate and communicate to government officials our commitment to human rights and issues affecting the safety and well-being of our employees, communities, investors and business operations.

## 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, including the use of prison labor. 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 may involve planning, contracting, 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.



## Panelists

- We value the privacy of panelists and audience members who share their data and information with us, and we place a premium on operating as a company that our panelists and stakeholders 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. We are committed to responsible stewardship of the data under our control and to compliance with all applicable privacy laws that regulate the collection, use and disclosure of data about individual people. For more information, please refer to [Nielsen's Privacy Principles](#) and the [Nielsen Trust Center](#).

One way we demonstrate our commitment to regular stakeholder engagement is through external transparency about our efforts. We will continue to explore new ways to further 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.



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## About Nielsen

Nielsen is a global leader in audience measurement, data and analytics. Through our understanding of people and their behaviors across all channels and platforms, we empower our clients with independent and actionable intelligence so they can connect and engage with their global audiences—now and into the future. Learn more at [www.nielsen.com](http://www.nielsen.com) and connect with us on social media ([X](#), [LinkedIn](#), [YouTube](#), [Facebook](#), [Instagram](#) and [Tiktok](#)).

**Audience Is Everything®**

