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Nielsen

Nielsen's Modern Slavery Statement

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2026 Nielsen Modern Slavery Statement for the year ending December 31, 2025

This Modern Slavery Statement was approved by the Board of Directors of Nielsen Holdings Limited on June 29, 2026.

This Modern Slavery Statement for Nielsen Holdings Limited also reflects the position of the subsidiaries controlled by Nielsen Holdings Limited (together referred to as "Nielsen" hereafter) as of December 31, 2025. It is also aligned with Nielsen's Global Commitment to Human Rights, which was updated in May 2025.

Our business and organizational structure

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 audiences—now and into the future. Nielsen operates around the world in more than 40 countries and employed approximately 11,800 people as of December 2025.

Nielsen Holdings Limited is a private limited company formed under the laws of England and Wales. Nielsen Holdings Limited and its subsidiaries, including subsidiaries in the United Kingdom, Australia and Switzerland, encompass all of Nielsen's global operations described in this statement.[1]

As a global company with a commitment to integrity and corporate citizenship, we manage and monitor the risks of human and labor/employment rights violations associated with our operations and the suppliers who are core to our business across the globe. The process of consultation by Nielsen Holdings Limited with its subsidiaries in relation to this report involves collaborative review of a draft of this report by relevant global functional leads and designated officers and/or directors of each relevant entity.

[1] Nielsen's UK subsidiaries covered by this report are Nielsen Media Research Limited, Nielsen Sports UK and Ireland Limited, and Advertising Intelligence Limited (dissolved December 9, 2025). Nielsen's Australia subsidiaries covered by this report are The Nielsen Company (Australia) Pty Ltd, Nielsen Television Audience Measurement Pty Ltd, NetRatings Australia Pty Limited, The Nielsen Company (Holdings) Pty Limited, Repucom International Pty Ltd, Repucom Investments Pty Ltd, Nielsen Sports Pty Ltd, H W W Pty Limited, and Landsberry and James Marketing Pty Limited. Nielsen's Swiss subsidiaries covered by this report are Nielsen International SA and Media Focus Schweiz GmbH.

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Our supply chain

Nielsen's supply chain consists of purchases in three high-level categories: technology, professional services, and direct service delivery costs like data collection through our panels, other datasets and measuring equipment. About a third of our spend is with technology and telecommunications suppliers, predominantly large, global enterprises based in the U.S. or Europe. Another third of our spend is with professional services suppliers (consulting, human resources, marketing, legal, finance, real estate, etc.) which tend to be large, global companies headquartered in the U.S. or Europe, and, to a lesser degree, small- to medium-sized enterprises (SMEs) in emerging markets, primarily in India. The balance of our spend consists of market research and related services, with both large global companies and small- and medium-sized firms located in many of the regions where we operate. This last category includes the relatively small subset of our suppliers who manufacture Nielsen-designed electronic measurement devices to track video and audio consumption. These contract manufacturers tend to be SMEs, primarily producing these devices in Asia.

Risk of human rights issues in our business and supply chain

Human rights are embedded in our overall approach to risk management through our Enterprise Risk Management (ERM) framework within the “Health, Safety and Human Rights” risk category. This multi-channel collaboration program allows us to take a more comprehensive and proactive approach to human rights risk management. ERM ensures that we are conducting annual assessments of our key risk areas, monitoring and reporting on these risks to senior leadership, and integrating any relevant findings into our organizational processes and policies as needed. We also monitor human rights-related risks through a variety of other processes across geographies and different areas of our business, which are detailed in “Our policies and practices to protect human rights” and “Our due diligence processes to protect human rights across our supply chain.” If an internal audit is requested and flags a concern, it would be highlighted and elevated to management and/or the right stakeholders for resolution.

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We recognize that monitoring human rights risks is critical for all stakeholder groups, but that some groups may require a heightened type or degree of monitoring, resources and support. With that in mind, we have identified key high-risk groups that require more rigorous monitoring: 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.

We are focused on maintaining panelists' privacy and the integrity of data reporting, and we prioritize the health and safety of our field employees who regularly interact with the general public.

As it relates to our supply chain, Nielsen understands that electronics manufacturing poses greater risks of human rights and supply chain violations than other sectors, particularly in certain geographies. To assess and address this particular risk, in addition to third-party supplier sustainability assessments for critical suppliers, Nielsen also requires its electronics manufacturing suppliers to complete specific social compliance questionnaires addressing human rights and fair labor/employment conditions at the production facility level. These self-assessments are required on a regular basis (no less frequently than every other year) to monitor and evaluate human rights and labor/employment risks within supplier organizations. The results of these questionnaires, along with other supplier due diligence tools (such as the Responsible Business Alliance's risk assessment platform and our supplier assessments mentioned above) and subsequent dialogue, determine the suitability for social audits to be conducted by a third-party audit firm.

Additionally, for all active suppliers, Nielsen uses an online, third-party platform available to members of the Responsible Business Alliance (RBA) to assess conformance with the RBA Code Section A.1, which states, among other standards, that: "Forced, bonded (including debt bondage), or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used." This risk assessment online platform is used to evaluate specific supplier and factory risks with respect to the RBA Code (including Section A.1) by inherent risk, sector and location. In 2025 we continued using this tool to assess active suppliers across the globe for this risk.



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Our policies and practices to protect human rights

Pursuant to the United Kingdom's Modern Slavery Act 2015, Part 6, Section 54, the Australian Modern Slavery Act 2018 and Switzerland's Art. 964 j-l Swiss Code of Obligation, Nielsen has continued to take steps during the financial year to identify any sources of potential risk of slavery and human trafficking in our supply chain and other parts of our business. Nielsen aligns itself with 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 Labor Organization ILO Conventions; European Convention on Human Rights; and the human rights-related recommendations set forth in the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct. Nielsen's alignment with these principles covers human rights risks related to—but not limited to—the following areas: discrimination, harassment, retaliation, 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. We demonstrate our commitment to human rights and the fair treatment of workers with policies and practices that prohibit human rights abuses in our organization and our supply chain, particularly with regard to involuntary labor, human trafficking or unacceptable work conditions, including our Nielsen Code of Conduct, Nielsen Supplier Code of Conduct and Nielsen's Global Commitment to Human Rights. Nielsen's Supplier Code of Conduct (applicable to any supplier who provides goods or services to Nielsen) was updated in December 2023, and Nielsen's Global Commitment to Human Rights was updated in May 2025, aligned with our regular policy review cadence and commitment to keep policies current. The Compliance and Integrity team coordinates the Global Policies Governance Council, a cross-functional team that meets twice-yearly to focus on ensuring Nielsen's global policies remain current (reviewed on a regular cadence appropriate to the subject matter), use consistent formatting and language, and align with business needs from a cross-functional perspective. All Nielsen policies are centrally available to our employees on an internal Nielsen Policies site bookmarked in employee workspaces; key policies are also available externally on Nielsen's Responsibility & Sustainability website.

Functional responsibility for managing, monitoring and tracking 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 & Belonging. Each functional group contributes its unique competencies to ensure that relevant human rights risks are appropriately addressed. Nielsen managers are responsible for ensuring their day-to-day business practices and decisions align with our Code of Conduct and corporate values, which underscore a commitment to human rights.

Compliance and Integrity, Integrity Leaders, Employee Relations (ER), and Human Resource 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, these groups will use information relevant to human rights-related issues to drive awareness throughout the organization and to mitigate risk in this area. Our ER team provides support, guidance, coaching and conflict management when needed. ER is available to assist employees in issues that require escalation, including discrimination, harassment and bullying; and Code of Conduct violations.

Employees and all Nielsen stakeholders, including external parties, have access to our Speak Up secure third-party portal and international helplines to report human rights and other concerns, either online or via telephone in local languages. The reports can be submitted anonymously where permitted by applicable law. Our Compliance and Integrity team reviews these reports of misconduct (directly or through the Helpline) and works with stakeholders to ensure that the concerns are reviewed and, as appropriate, investigated promptly.

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Upon substantiation of a report, the company determines the appropriate corrective action—ranging from a warning to termination—based on the severity of the findings. The Compliance and Integrity team analyzes data about prior outcomes to inform disciplinary decisions. While Nielsen did not receive any grievances or reports related to modern slavery through the Speak Up helpline in 2025, we recognize that underreporting may occur in this area and we continue to promote awareness and accessibility of our reporting channels.

Nielsen is committed to a victim-centric approach in the event that modern slavery is identified within our operations or value chain. Should a credible report be received, our first priority is the safety and well-being of the victimized individuals, while the investigation is carried out by a cross-functional team, including root cause analysis. We aim to facilitate access to appropriate remediation, which may include partnering with specialized third-party non-governmental organizations (NGOs) or local support services to ensure victims receive the necessary care and guidance. We recognize that effective remediation requires a tailored response, and we remain committed to evaluating the most meaningful ways to support those impacted by exploitation.

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 more than 40 countries in which we operated in 2025. 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. This information is then used to frame our decisions on appropriate mitigation strategies to the new and evolving geopolitical, economic and health risks.

Nielsen develops and maintains processes to address potential issues of workplace health and safety for employees. We maintain a commitment to health and well-being. Nielsen’s benefit offerings are designed to meet the varied and evolving needs of our workforce across businesses and geographies. We have enhanced the ways we help our employees care for themselves and their families. Nielsen's Nspired Wellness program takes a comprehensive approach to employee well-being, addressing physical, emotional, financial and social health needs since 2015. The program has continuously evolved to support our global workforce, with well-being ambassadors championing initiatives at all levels—global, national and local. Through our partnership with Spring Health, a mental health services platform, we provide valuable mental health benefits to employees and their families in 40 countries as of 2025, ensuring Emotional Health Support programs reach employees in every location where Nielsen operates worldwide.

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We also manage relevant risks and opportunities through a variety of ongoing internal engagement channels and rely on guidance from leaders across the business. More information about our overall efforts across responsibility and sustainability areas critical for our business can be found in our 2025 Responsibility & Sustainability Report.

Training available to our staff

As it relates to employee engagement on human rights-related issues, our Nielsen Code of Conduct is separate from our Supplier Code of Conduct and establishes guidelines and expectations for lawful and ethical conduct by all our employees. Our Code of Conduct includes a section on "Protecting human rights" to ensure every employee is aware of and understands our obligations and expectations in this area, and encourages employees to be vigilant in protecting against exploitation of vulnerable populations, human trafficking and child and forced labor. The Nielsen Code of Conduct is translated into over 20 languages, and all employees are required to certify annually that they understand and will comply with the Code of Conduct.[2] Nielsen provides a virtual training video for our employees about the warning signs of modern slavery and human rights violations when working with suppliers, which is available in 20 languages on Nielsen's Compliance and Integrity Training Resources intranet site.

Nielsen employees create our culture of inclusivity in the ways we work every day. To ensure clear understanding of expectations, all U.S., Mexico, and UK employees are required to complete a "Respect in the Workplace" training, with the possibility to expand to additional geographies in the future. This training builds on the Code of Conduct training with more details on how to cultivate a work environment free from harassment, discrimination and retaliation as well as how to report any issues around these topics.

We make online training modules on the Nielsen Supplier Code of Conduct available to both Nielsen employees and suppliers. Training modules in social compliance can be assigned to internal staff and suppliers. Nielsen provides training to those with a direct contract manufacturer supplier relationship to ensure they are capable of identifying any potential abuses. Two members of the team who work with electronics manufacturers have been trained by the RBA to audit factories against the Supplier Code. Since the Supplier Code of Conduct's latest update in December 2023, the Procurement team holds training every calendar year to ensure that 100% of the Global Procurement team is trained on the code.

In April 2025, Compliance & Integrity and Corporate Citizenship visited the Mumbai and Bangalore offices in India for stakeholder meetings, training and town hall sessions on policy awareness and engagement, including information on Nielsen's Code of Conduct, human rights and modern slavery policies, as well as channels for reporting concerns. 600+ attendees participated in these sessions either in-person or via livestream. In April 2025, Employee Relations conducted additional core values and Speak Up policy training in Mumbai and Bangalore.



[2] Unless prohibited by local law.

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Our due diligence processes to protect human rights across our supply chain

Nielsen is a supporting member of the Responsible Business Alliance, and as such, our Supplier Code of Conduct is harmonized to this code. The RBA Supplier Code has been adopted by more than 100 Fortune 500 and multinational corporations engaged within the global electronics supply chain. We have chosen to align ourselves with this industry code and organization due to the particular risk of exposure to labor exploitation within the technology and electronics equipment manufacturing segments of our supply chain. Nielsen incorporates supplier code of conduct adherence in the company Master Service Agreement (MSA) and in the supplier registration module of our Enterprise Resource Planning (ERP) system.

Once a supplier enters our supply chain, Nielsen endeavors to ensure ongoing supplier compliance with our human rights policies through our Global Procurement team, which provides appropriate oversight through planning, control, monitoring, measurement, corrective action, auditing, review and reporting.

In 2025, Nielsen integrated a third-party platform to provide environmental, social and governance (ESG) scorecards and risk assessments for all suppliers registered in our ERP system, resulting in an increase of our ESG risk assessment coverage to 64% of our spend under management in 2025. The assessment gathers information about suppliers' policies at the company level. It uses information such as written company policies, third-party certifications, and membership or adherence to widely recognized industry standards such as the RBA, along with media and non-governmental (NGO) reports. From these data points, a scorecard is generated on responsibility and sustainability risks for our strategic suppliers. Based on these assessments, Nielsen determines mitigating actions and corrective action plans with those suppliers. In 2025, we added two new categories of suppliers to our ERP system: security services in the United States, Mexico and India, and recruiting agencies for our own workforce, which enabled ESG scoring for these supplier categories.

For contract manufacturers, we use various means of supplier engagement to assess whether management systems are present to address any potential social violations. The primary contract manufacturer for Nielsen meters does not use any third party recruiting agencies for its labor, which is a practice that raises the risk of forced labor, and therefore the absence of such enables better management of risk. To date, we are aware of no cases of modern slavery or forced labor that have been found in Nielsen's operations or supply chain but we remain vigilant in this regard.

To address social and human rights risks specifically in our contracted electronics factories, Nielsen regularly (no less frequently than every other year) collects company and facility-level data through social compliance questionnaires geared towards electronics manufacturers, along with dialogue and third-party due diligence to assess risks and identify further action, such as the need for social audits. We collected this data for 2025 operations of our Tier 1 meter manufacturing suppliers. We analyze the results and follow up with specific corrective action plans as necessary. Having finalized the analysis of our 2025 data, we found no substantial issues of concern, and our goal is to maintain our current level of engagement for 2026. Notwithstanding this, we recognize that the absence of identified issues does not eliminate risk, and we continue to enhance our detection and monitoring mechanisms.

Typically, Nielsen's Global Procurement team engages with contract manufacturers several times per year through regularly scheduled on-site factory visits, conference calls and meetings. In 2024 we resumed in-person site visits with some of our key manufacturing suppliers for the first time since pandemic related travel restrictions were imposed. A planned social compliance site visit was scheduled with manufacturing facilities Q1 2026 but has been rescheduled due to heightened geopolitical concerns at the time. Site visits are an important step in helping us to increase due diligence on and engagement with the companies that support Nielsen's business and growth, especially since electronics manufacturing can pose greater risks of human rights and supply chain violations than other sectors.

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Our effectiveness in protecting human rights across our business and supply chain

We use a variety of performance indicators to measure our progress and performance as it relates to identifying, preventing and responding to modern slavery throughout our business, operations and supply chain. As detailed in this document, we actively measure our suppliers' performance and progress across a range of responsibility and sustainability areas, including human rights-related risks. As it relates to our business, we regularly monitor human rights risks that may be raised through our internal processes, as well as through the functional areas with some form of dedicated responsibility to protecting human rights across our organization.

Our risk assessment and methodology considers a combination of factors, including geography, sector risk, supplier type, spend, and available third-party risk indices. Suppliers are categorized into risk tiers based on these criteria, which determines the level of due diligence applied.

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 Responsibility & Sustainability Report and regular communications via our website. This statement is made pursuant to section 54(1) of the United Kingdom Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 and Switzerland's Art. 964 j-l Swiss Code of Obligation. It constitutes our anti-slavery and human trafficking statement covering Nielsen for the financial year ending 31 December 2025.

Signed for and on behalf of Nielsen Holdings Limited.[3]

Director Name: George D. Callard

Director Signature: Signed by: George D. Callard EA25574139B94A0...

Date: June 29, 2026

Director Name: Paul Kim

Director Signature: Signed by: Paul H Kim 0EA1E359EED84C8...

Date: June 29, 2026

[3] Nielsen Holdings Limited is the reporting entity, for the purposes of the Australian Modern Slavery Act 2018.

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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 and connect with us on social media (X, LinkedIn, YouTube, Facebook and Instagram).

Audience Is Everything®

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