



CODE OF GOOD PRACTICES

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PRESIDENT'S MESSAGE



Média-Participations has a beautiful profession, of spirit, art, freedom. Through our subsidiaries specialising in publishing, press, audiovisual, games, broadcasting, parks, logistics, bookshops and services, our imagination creates links between people and seeks to make life more beautiful.

In each of these sectors, boldness and risk-taking are essential to create and undertake. But boldness and risk must be combined with respect for our fundamental principles.

These are:

- to bring to life within the Group the seven key values that form the basis of our identity;
- to comply with the ethical standards and to comply with the laws and regulations of each of the countries in which we operate;
- avoid any behaviour or action that could harm our Group and/or our subsidiaries and constitute a risk to our reputation;
- act legally and honestly;
- place the interests of the Group above personal or other interests.

The Code of Good Practices should serve as a compass for all of us, to continue to create, collaborate and undertake while ensuring that our actions comply with our principles and the laws and regulations in force.

The commitments listed in the Code are pillars of the trust we build with our employees, authors, suppliers, partners and customers.

Together, let's make this Code of Good Practices not a simple formality, but a tool that guides each of our decisions and gives us every chance to bring our editorial creations to life and pass on them.

A handwritten signature in blue ink, appearing to read 'Vincent Montagne', with a long horizontal line extending to the right.

Vincent Montagne

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REMINDER OF THE GROUP'S FUNDAMENTAL PRINCIPLES

In 2019, the Média-Participations Group retained and defined seven fundamental principles that constitute its key values. They are part of a logic of performance and high standards, with respect for people and decentralized governance. These principles are at the heart of our vision and our commitment on a daily basis, both internally and with our authors, our partners and our suppliers. Each of us is encouraged to embody them in all our initiatives.

Respect for people: we place the quality of human relations at the heart of our concerns. Respect for others fosters mutual trust and strengthens fruitful collaborations within the Group.

Autonomy: We attach great importance to the autonomy of people and subsidiaries in the service of the Group's common objectives. Taking initiatives, expressing ideas freely, developing the original entrepreneurial culture of each of our houses is at the heart of our DNA.

Heritage: we are deeply committed to the preservation, enhancement and transmission of our heritage (intellectual, artistic, human) and aim to contribute to its enrichment in our various professions.

Responsibility: responsibility is first and foremost that of each person with regard to his or her work and the teams of which he or she is a member. Responsibility also means meeting our commitments to our stakeholders, as well as ethical, social and environmental standards.

Audacity: Boldness is the driving force behind our ability to reinvent ourselves and innovate. We encourage thoughtful risk-taking and the exploration of new avenues. Without boldness, there is no progress.

Creativity: our professions are all linked, directly or indirectly, to the works of the mind. Hence the importance of creativity, which is expressed through our ability to edit, publish, distribute, imagine, design and offer various content, on all current or future media.

Sharing: sharing is an essential element of our Group, which aims to serve through its products the dissemination of knowledge and ideas through reading and maintaining links between people through games, images, fun and service.

These fundamental principles are the foundation of our success and sustainability. By embodying them every day, we contribute to the construction of a stronger, more innovative group that is ever more respectful of its cultural, human and economic environment.

OBJECTIVES AND SCOPE OF THE CODE OF GOOD PRACTICES

THE CODE OF GOOD PRACTICE

The Code of Good Practices allows us to remind everyone, internally and externally, of the values of probity and integrity that we defend. As such, this Code of Good Practices :

- defines and prevents against prohibited behaviour;
- illustrates problematic situations;
- explains good practices;
- details the alert procedure.

The Code of Good Practices sets a framework for the exercise of our activities but must not be an obstacle to the freedom to create and the audacity to undertake while respecting the space of this framework.

COMPLIANCE WITH LAWS, STANDARDS AND REGULATIONS

We are bound by the legal provisions applicable to our activities. In this regard, compliance with the laws and regulations in force must never be compromised. We must also comply with internal rules and guidelines that may apply in certain situations.

LEGAL VALUE

In accordance with what is recommended, the Code of Good Practices is backed by the internal regulations of the Média-Participations Group and/or will be communicated by any means. Any breach or violation may lead to disciplinary sanctions, in addition to the civil and criminal sanctions provided for by the various applicable legislations.

A reference body is set up for the Group and is responsible for ensuring compliance with the Code of Good Practices and supporting us in preventing any situation that may involve risks.

The procedures referred to in the Code of Good Practices are procedures put in place by the Group. All procedures must be followed in the same way, depending on their scope.

SCOPE OF THE CODE OF GOOD PRACTICE

The Collaborators

The Code of Good Practices is the reference document of the Média-Participations Group. We operate in many countries through our subsidiaries, including France, Belgium, Germany, Switzerland, the United States and China. The Group's reputation depends on the exemplary performance of each subsidiary and each of us.

This Code of Good Practices is intended for us and is integrated into the internal regulations of the subsidiaries or communicated by any means to each of us.

As an instrument of good governance and an expression of the desire to come together around common values, it explains the way in which risks can be encountered in the course of our activities. It also provides answers to questions we may have when faced with risky situations. This Code of Good Practices specifies what is prohibited and what is permitted or when we should seek assistance.

Our external partners

The Code of Good Practices is also an external communication tool and allows us to disseminate our values to our authors, customers, suppliers and partners in order to remind them of our expectations in the relationship we have with them.

Our suppliers and partners are required to apply and comply with all the provisions of this Code of Good Practices.

The Code of Good Practices is drafted by the Ethics and Compliance Department, validated by the Group's General Management and is publicly accessible from the Group's website via the following link: <https://www.media-participations.com/fr>.

Any breach of the Code of Good Practices must be reported through the whistleblowing system described in this document.

THE COMMITMENTS EXPECTED OF SUPPLIERS AND SUBCONTRACTORS TO OUR GROUP

We expect our suppliers and subcontractors ("Suppliers") to commit to abide by the Code of Good Practices as a whole. Our Suppliers must also commit to respecting human rights, working conditions, environmental protection and business ethics as essential obligations for the establishment and continuation of business relationships with our Group. Suppliers must demonstrate transparency, good faith and cooperation to ensure compliance at all stages of our relationship.

RESPECT FOR FUNDAMENTAL PRINCIPLES: RESPECT FOR HUMAN RIGHTS

Child labor

Suppliers must ensure that no person who is not legally of working age has been involved in the production or distribution of goods or services unless otherwise authorized and in compliance with legal provisions.

A child is defined as any person who has not reached the minimum age for work established by the laws of the country in which our or our partner's institution is located, or, in the absence of a law, the minimum age for completing compulsory education.

Prohibition of illegal, clandestine and undeclared employment

Our Suppliers are required to comply with all applicable regulations to prevent illegal, clandestine and undeclared employment.

Prohibition of forced labor

Our Suppliers may not engage in any form of slavery, serfdom, or forced or involuntarily forced labor.

Our Suppliers may not engage in the exploitation or trafficking of men, nor import goods that are, in any way, the result of slavery practices or human trafficking. Suppliers may not force their employees to work to repay a debt owed to them or to a third party. Suppliers must also not retain their employees' official identification documents, passports or work permits as a condition of employment.

Freedom of association

Suppliers are required to respect the right of workers to associate or not to associate with any group, as permitted and provided for by all applicable laws and regulations.

PROTECTION OF THE GROUP'S TANGIBLE AND INTANGIBLE ASSETS

It is essential for the Group that Suppliers protect the Group's assets to which they would have access in the course of their relationship with the Group. These assets include material or intellectual property within the meaning of the Intellectual Property Code belonging to the Group.

The use or transfer of the Group's assets for personal use is not permitted, unless otherwise authorized by contract concluded with the Group or one of its subsidiaries and provided that it does not compromise the interests of the Group.

OUR COMMITMENTS TO OUR WORK ENVIRONMENT

Freedom from harassment and discrimination

We have a zero-tolerance policy towards any form of harassment or discrimination. We are committed to providing a work environment where every employee is treated with respect, fairness and dignity.

Any form of moral, sexual, physical or verbal abuse or harassment, threats of violence or corporal punishment will not be tolerated. Any complaint of harassment or discrimination is treated with the utmost seriousness and is thoroughly investigated.

Salaries and benefits

We ensure that all employees are paid in accordance with the applicable law in the country and that the remuneration is appropriate to the work, without any form of discrimination.

This includes the minimum remuneration if there is one, the payment of overtime, the payment of bonuses (depending on the applicable law, special contractual provisions or agreements). No reduction in salary shall be made for disciplinary reasons.

Recruitment

We are committed to conducting a recruitment process based on the skills and qualifications of candidates.

Our recruitment procedures are designed to avoid any form of discrimination and ensure equal opportunities.

Training and Development

Because we believe in the importance of continuous professional development, we offer regular training programs to improve our skills and knowledge, while ensuring that these programs incorporate modules on good professional practices.

Work Environment

We provide a safe and healthy working environment, in accordance with all applicable laws and regulations, ensuring at least reasonable access to drinking water and sanitation facilities, and provided with adequate fire safety, lighting and ventilation.

We must ensure that all employees are made aware of and trained in emergency plans and safety at work. We must also put in place systems to prevent, detect and respond to potential risks to the safety, health and safety of all employees (Single Document for the Assessment of Occupational Risks "DUERP").

Performance evaluation

Individual and professional appraisal interviews are carried out regularly.

They aim to recognize accomplishments, identify areas for improvement, and set clear goals. These assessments are conducted impartially and in accordance with internal policies and ethical standards.

COMPLIANCE WITH ENVIRONMENTAL PROTECTION REGULATIONS

We are required to manage, measure and mitigate the environmental effects produced by our buildings or the buildings of our partners with whom we work. These include air emissions, waste reduction, recovery and management, water use and wastewater disposal, and greenhouse gas emissions.

OUR COMMITMENTS TO OUR FIGHT AGAINST CORRUPTION

Corruption is a generic term for corrupt practices, influence peddling, bribery, illegal taking of interests, embezzlement of public funds and favoritism.

Corruption is based on a " **pact** " that consists of granting or asking for an **undue advantage** in exchange for a **favor to which the person** was not entitled.

Corruption can be **private or public**, i.e. the presence of a public official in the "pact" concluded is not mandatory to characterize acts of corruption.

Corruption can be **active or passive**.

Active **corruption** is the act, by anyone, of proposing, without right, at any time, directly or indirectly, offers, promises, gifts, gifts or advantages of any kind to a person, for himself or for others, either to perform or to have performed, to refrain or to have refrained from performing an act of his office, mission or mandate or facilitated by his function, its mission or mandate.

Passive corruption is the act of a person soliciting or accepting, without right, at any time, directly or indirectly, offers, promises, gifts, gifts or advantages of any kind for himself or for others, either to perform or have performed, to refrain or to have refrained from performing an act of his office, mission or mandate or facilitated by his function, its mission or mandate.

Corruption can be **direct or indirect**, i.e. there can be the intervention of an intermediary in the corruption scheme.

The illegality of corruption is characterized by **the intent to corrupt**, and corruption can be characterized without a material act. Giving in to solicitations also constitutes corruption.

Thus, in order to characterize an act of corruption, it is irrelevant that:

- **the benefit has been received or not;**
- **the promised consideration has not been received;**
- **the corrupter is forced to have the advantage;**
- **the request has not been formally expressed.**

WHAT THE LAW SAYS

National laws punish corruption involving public officials, as they have a duty of probity reinforced by virtue of their very function. However, many laws also punish corruption offences between private natural and legal persons.

International conventions allow national courts to prosecute people who have committed acts of corruption abroad.

The penalties are applicable to perpetrators and accomplices, whether they are natural or legal persons.

SANCTIONS

Natural persons may incur the following:

- Prison sentences;
- Fines.

Legal persons **may incur the following:**

- Administrative and civil fines;
- Exclusion from public contracts;
- Prohibition of making a public offering;
- Publication of the sentence.

There are various offences, known generically as "corruption". All actions relating to one of the following offences are prohibited:

LA CORRUPTION

It is the fact that a person invested solicits, proposes or accepts, assigns, a gift, an offer or a promise, with a view to performing, delaying or omitting to perform an inbound act, directly or indirectly in the course of his or her duties.

Example: paying a civil servant to obtain a visa more quickly.

INFLUENCE PEDDLING

It is the fact that a person solicits or accepts, without right, at any time, directly or indirectly, offers, promises, gifts, gifts or advantages of any kind for himself or for others: either to perform or refrain from performing an act of his office; or to abuse his or her real or supposed influence with a view to obtaining distinctions, jobs, contracts or any other favorable decision from a public authority or administration.

Example: asking for a gift in exchange for an intervention to obtain a coveted plot of land.

THE CONCUSSION

It is the fact, by a public person:

- to receive or claim an undue sum by way of duties or taxes;
- to grant an exemption from an amount owed by the person concerned (exemption or exemption from duties, contributions, taxes or public charges) in violation of the regulations.

Example: a customs officer who asks for a larger sum than what is due under the law to let a truck of books pass.

THE EMBEZZLEMENT

It is the act by a person of destroying, misappropriating or removing an act or a title, or public or private funds, or any other object that has been given to him or her because of his or her duties or mission (theft, fraud, misuse of company assets, etc.).

Example: during contract negotiations with a supplier, part of the discount granted is directly passed on to the buyer.

FAVORITISM

It is the act by a person of procuring or attempting to procure an unjustified advantage for another person by an act contrary to the regulations in the context of a public contract or a public service delegation.

Example: awarding a contract to a supplier of one's knowledge without respecting the award procedures

RISK SITUATIONS

GIFTS AND HOSPITALITY

The rules relating to gifts and invitations in the Group are intended to apply both to gifts and invitations **received and to those offered**.

The gifts or invitations mentioned in the Code of Good Practices are:

- Any **valuables or benefits** exchanged for free
- Any **activities offered/received** for free or at a lower price (such as meals, travel, accommodations, sporting events or recreational activities)

Risks

→ Gifts, donation and invitations may alter the independence of the decision or service and call into question the impartiality or honesty of the recipient.
→ Behind the issue of Gifts and Hospitality there are strong reputational issues for the Group.
→ A case of corruption in a business or a subsidiary, even a remote one, can have a negative impact on the entire Group.

At Média-Participations

In the Group, it is forbidden in particular to:
→ solicit or offer any unlawful commission, directly or indirectly;
→ promise, offer or accept a benefit that may influence the behavior of the person receiving it;
→ accept or offer a sum of money or any other means of payment as a gift.

The only gifts or invitations that can be made must :

- **Be offered without compensation, be occasional, reasonable and appropriate;**
- **Correspond to normal professional use (business lunch);**
- **Comply with the expense report procedure applicable to the subsidiary or the Group;**
- **Be declared to their superiors;**
- **Respect the laws of the countries where they are traded.**

FACILITATION PAYMENTS

"Facilitation payments" are payments of small amounts that ensure the performance of administrative tasks to which the payer is normally entitled free of charge (legally or contractually).

Example: obtaining a visa, obtaining a payment delay, etc.

Risks

- Facilitation payments are prohibited, in particular by French legislation.
- Facilitation payments damage the Group's image of probity.

At Média-Participations

Facilitation payments are prohibited within the Group and worldwide.

For example, it is forbidden to:

- agree to assign a sum of money not provided for in the contract to a supplier in order for it to comply with the deadlines agreed in the contract;
- accept a sum of money in exchange for a service;
- pay an intermediary to "arrange" to obtain an administrative document more quickly;
- in the event that the use of an intermediary is mandatory or imposed by local authorities, the payments made in accordance with the rules of the entity concerned must be traced.

CONFLICTS OF INTEREST

A conflict of interest is a situation that arises when a person is likely to be influenced, in the performance of his or her duties, by another public or private interest, distinct from the one he or she must defend in his or her duties.

The conflict of interest may arise:

- At the entity or Group level, which would find itself in a situation of conflict between two customers; or
- At the level of an employee, in the performance of his or her duties.

In both cases, it is imperative to be very vigilant about the occurrence of these situations.

Risks

- A conflict of interest involves risks for the Group from a regulatory point of view.
- A situation of conflict of interest may be detrimental to the Group by causing the employee to take a decision that is contrary to or not the most appropriate to the interests of the Group.

At Média-Participations

The risk of conflict of interest is taken very seriously, to guarantee an image of probity and the independence of its employees.

It is therefore recommended to

- the selection of a supplier or intermediary that is part of our knowledge must be based on objective criteria and always in the best interest of the Group;
- ensure that a person who has been involved in the award of a contract is not involved in the award of a subcontract or benefit;
- Maintain confidentiality with employees;
- immediately declare to their superiors any situation in which the Média-Participations Group or the employee may find themselves in a situation of conflict of interest;
- check the absence of any conflict of interest situation before entering into a contract;
- if necessary, for the employee, do not hesitate to withdraw from the decision-making process

BUSINESS RELATIONSHIP

The Média-Participations Group, which is present throughout the world, must be vigilant in the context of its business relationships, as the choice of its business partners may present a **risky situation** and expose it to sanctions.

Risks

- Dealing with partners at risk in the field of corruption, and thus being held accountable for their misconduct.
- Establish business relationships with partners in embargoed countries, and thus expose themselves to trade sanctions.

At Média-Participations

- In order to ensure the integrity of its suppliers and subcontractors, the Group must, before any business relationship, implement an evaluation procedure to verify that they are acting in accordance with the laws and regulations in force. The purpose of such an assessment is to establish sufficient knowledge of its partners and to identify any risks involved in future business relationships.
- Business relationships with certain countries may be subject to trade controls and restrictions. Trade in targeted goods and services may be prohibited and subject to sanctions. As such, the Group undertakes to check the list of countries subject to trade restrictions before any commercial approach by consulting the customs website accessible via the following link:
<https://www.douane.gouv.fr/demarche/consulter-la-carte-interactive-des-mesures-de-restrictions-commerciales>

INTEREST REPRESENTATION (LOBBYING)

Interest representation is understood as the fact of [entering into direct or indirect contact](#) with a public official in order to influence a public decision, to defend particular values and interests.

Interest representation actions therefore make it possible to defend the interests of the Média-Participations Group with public actors, and are therefore necessary for the proper functioning and administration of the Group. However, it is important to avoid that these representational actions can be assimilated to a form of influence peddling.

Risks

- The risk is that representational actions will be assimilated to a form of influence peddling.
- Representation actions engage the Group's image with public and private players in the sector.

At Média-Participations

In order to limit the risks associated with representation actions:

- representation actions must be carried out by persons authorized to do so in the light of their duties;
- it is necessary to ensure compliance with the regulations on interest representation.

ENSURING COMPLIANCE WITH THE CODE OF GOOD PRACTICES

BY THE GROUP'S SUPPLIERS

Groupe Média-Participations may be held liable for acts committed by its business partners, particularly when these acts, carried out in its name or for profit, violate the laws and regulations in force.

Suppliers must act in accordance with the Group's policies and values.

We attach great importance to our Suppliers' compliance with the provisions of the Code of Good Practices. Our Suppliers must have read and agreed to comply with the provisions of the Code of Good Practices before entering into a contract.

Risks

The actions and behaviors of the Group's business partners may damage the Group's reputation and lead to negative legal, financial and reputational impacts.

At Média-Participations

In order to limit the risks associated with the actions and behaviors of business partners:

- the Group subjects them to processes to assess their integrity before any commitment and then throughout the contractual relationship;
- the Group ensures that they have the required qualifications for the assignments entrusted to them.

BY EMPLOYEES

Employees must act in line with the Group's policies and values.

They must:

- **Know** the requirements of the Code of Good Practices as well as the operational procedures applicable in his/her entity, and comply with them;
- **To appropriate** the Group's rules, in particular by regularly referring to the Code of Good Practices;
- **Be part** of a corruption risk prevention approach by:
 - Informing
 - Complying with the policies and procedures applicable to its scope of activities
 - Alerting quickly in case of doubt or problems
- **Raise** concerns by promptly escalating any concerns about potential breaches of the Group's Code of Good Practices.

THE ALERT SYSTEM

The Média-Participations Group has chosen to set up a whistleblowing site (hereinafter "the Site") in order to promote a safer working environment. The objective is to allow employees, partners and all third parties, under the conditions defined below, to alert on the subjects listed in the section below "*What information can be reported?* ", in complete confidentiality and confidence thanks to an encrypted reporting site.

In addition, as a whistleblower, you can benefit from a protective status, which protects you from possible retaliation. However, this protection remains subject to certain requirements, which is why, through this guide, we will present to you:

- How to benefit from whistleblower status;
- How the law protects the whistleblower;
- How to make your alert.

The Média-Participations Group attaches great value to the courage and intelligence of a whistleblower. Each alert calls on the collective and if after an investigation the situation reported as a risk is proven, the Group's response must be collective in order to repair the situation by preserving and protecting the interests of everyone.

However, the whistleblower procedure must be used in a reasoned manner and be carried out in good faith, according to the steps set out below. It must not be used in any way for malicious purposes and in no case be exercised for denunciation or slanderous denunciation.

THE STATUS OF WHISTLEBLOWER

A whistleblower is any natural person who reports or discloses certain information by bringing it to the attention of an employer, an administrative authority, or by making it public, and this:

- Without getting any direct financial compensation;
- And in good faith (i.e., by having reasonable grounds to believe that the facts reported are true, in light of the information held).

The report may be made **within the framework of a professional relationship or outside of any professional context**, but in the latter case, the whistleblower must have personal knowledge of the information, and the report cannot be made on the Site but must be reported directly to the competent administrative authorities.

The protection of the whistleblower is now extended to those around him: the **facilitator**, i.e. a natural or legal person who helps the whistleblower to make a report or disclosure. These may include trade unions, associations, relatives or colleagues of the whistleblower.

However, in order to be able to benefit from the status of whistleblower, certain **conditions** must be met:

- Some specific to the information reported,
- Some specific to the issuer of the alert.

WHAT INFORMATION CAN BE REPORTED?

Only facts that either:

- Are of an illicit nature (crime/misdemeanor);
- Harm the public interest;
- Constitute a violation or an attempt to conceal a violation of international or European Union law, law or regulation.

This may include the following topics:

- ETHICS : Illegal behavior (corruption, fraud, competition law, money laundering, accounting, finance, etc.) or behavior contrary to the Média-Participations Group's ethical framework;
- ENVIRONMENT : Environnemental protection;
- DUTY OF VIGILANCE : Violation of human rights and fundamental freedoms;
- SOCIAL : Health, hygiene and safety / Discrimination or harassment.

On the other hand, information and documents relating to:

- National Defence Secret,
- Medical confidentiality,
- Secrecy of judicial deliberations,
- Secrecy of the investigation or judicial investigation,
- Solicitor-client privilege.

WHO CAN BENEFIT FROM THE STATUS OF WHISTLEBLOWER?

To be considered a whistleblower, you must, in addition to falling into the definition of whistleblower above, belong to one of the following categories:

- Staff Members:
 - Entities of the Média-Participations Group,
 - Persons whose employment relationship has ended (when the information was obtained in the context of this relationship),
 - Persons who have applied for a job with the relevant entity, where the information has been obtained in connection with that application.
- Shareholders, partners and holders of voting rights at the entity's general meeting,
- Members of the administrative, management or supervisory body,
- External and occasional collaborators,
- Co-contractors of the entity concerned and their subcontractors or, in the case of legal persons, members of the administrative, management or supervisory body of these co-contractors and subcontractors as well as members of their staff.
- Any person who has obtained the information outside the professional context, provided that he or she has personal knowledge of it.

WHISTLEBLOWER PROTECTION

As soon as you meet the definition of a whistleblower (set out above), and you comply with the reporting rules (set out below), you have the possibility of benefiting from the protection provided for by Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life, known as fir II (amended by Law No. 2022-401 of 21 March 2022.).

Indeed, the legislator prohibits any form of retaliation against whistleblowers and gives them the means to defend themselves if they are victims.

- It is therefore forbidden to oblige or encourage you to renounce your status as a whistleblower (by a clause in the employment contract for example).
- It is also forbidden to subject you to retaliation in connection with your alert, i.e., for your employer to take an unfavorable measure against you because of your alert (dismissal, suspension, layoff, reduction in pay, disciplinary sanction).
If this is the case, you have the possibility to request the cancellation of these measures as well as compensation for the damage suffered before the courts.
- You are also protected against certain actions, since you cannot be prosecuted, criminally or civilly, for facts related to your alert.
- You may receive financial support in connection with proceedings brought by or against you.

If you do not have the status of whistleblower and/or if you do not comply with the reporting rules and your report appears to be abusive, you are exposed to civil or criminal prosecution in accordance with the provisions of French law.

THE WHISTLEBLOWING PROCEDURE TO BE FOLLOWED IN ORDER TO BENEFIT FROM PROTECTION

As a whistleblower, you have the option of disclosing the information through a **report**, which can be internal or external, and through **public disclosure**. However, the protection granted to the whistleblower remains conditional on the following of a well-defined procedure:

- Either first make a report,
- Public disclosure is only possible at a later stage, under the conditions set out below.

There are therefore two possible reports:

- Internal reporting, which consists of launching an alert on our Site.
- External reporting, which consists of bringing the alert to the attention of an institution designated by the texts.

Which report to choose?

- If the information that is the subject of the report was obtained in the course of your professional activities, you have the choice between internal and external reporting, both of which can be carried out in parallel.
- If the information that is the subject of the report was obtained outside a professional context, on the other hand, only external reporting is possible.

INTERNAL REPORTING

Two conditions must be met in order for you to proceed with an internal report:

- The alert must relate to professional information:
- Obtained in the course of your professional activities,
- And relating to facts that have occurred/are likely to occur in the structure concerned.
- You are/have been in a professional relationship with the structure in question.

❖ The information to be transmitted:

All you have to do is choose the entity concerned, then complete the dedicated online form. The Site is accessible at any time from any connection.

The information communicated in the context of a whistleblowing system must remain factual and have a direct link with the purpose of the alert. You should avoid communicating sensitive data (origin, politics, health, sexual orientation, etc.) or infringement data, unless this information is absolutely necessary for your report.

You have the option of attaching documents when sending your report.

You can also send them later by logging back into the Site using your login details provided by the Site. The metadata of the documents you transmit via the Site is deleted to guarantee anonymity in the event that this option is chosen.

You are informed that only cases for which the information provided is precise and sufficient may be investigated. Otherwise, the team in charge of the investigations will ask you through the Site, for all the useful and necessary details in order to start the investigation. If you do not respond within 15 working days, the alert will be closed without further action.

❖ The issue of whistleblower anonymity

It is possible, when you report your report, not to disclose your identity. However, you are advised to give your identity, as this can help in the investigation and resolution of the case.

In addition, as soon as the report is anonymous, the verification of belonging to one of the categories allowing to be considered as a whistleblower cannot be made, and the status of whistleblower cannot therefore be confirmed.

Consequently, the follow-up given to the alert will depend on the nature of the facts reported and the possibility of verifying them in the light of the elements provided.

❖ How is the confidentiality of the whistleblower preserved?

As soon as you communicate your identity to the person who processes the report, the latter preserves your confidentiality in order to ensure your protection.

Our procedure for collecting and processing reports guarantees strict confidentiality on the following points:

- The identity of the whistleblower: elements likely to identify the whistleblower may only be disclosed with his or her consent. However, they may be communicated to the judicial authority, in the event that we are legally obliged to report the facts. The whistleblower is then informed, unless this information is likely to jeopardize the legal proceedings.
- The identity of the persons targeted by the alert and of any third party mentioned in the report: the elements likely to identify the person implicated by a report may only be disclosed, except to the judicial authority, once the well-founded nature of the alert has been established.
- Information collected by all the recipients of the report.

❖ Is our Site secure ?

Our Site is hosted by a specialized external partner: "EQS GROUP", in order to ensure the security and confidentiality of exchanges.

The reporting process and all exchanges that will take place in the context of the alert are strictly confidential and are carried out through secure and encrypted channels on the Site.

Only authorized persons can access whistleblowers' messages (see paragraph "Who handles my report?"). The highest level of security in the field also guarantees the anonymity of whistleblowers whenever they wish to do so and protects sensitive data.

❖ How do I track my alert ?

When you send your alert, you will see a username and password appear on your screen, keep them. They will be required to connect to the dedicated chat space or to provide additional information.

❖ What should I do if I lose my username or password ?

For security and privacy reasons, your username and password are not accessible to anyone other than you.

If you lose your username or password, you will not be able to reset or recover them.

If you have chosen to disclose your identity or if you have left contact details on which you can be reached, we will contact you via the means left (email, telephone).

If you have chosen to remain anonymous, you will need to make a new report.

❖ Who will handle my report ?

The Site is managed in a decentralized manner. Reports are received immediately and exclusively by the authorized members who decide on the action to be taken and ensure the follow-up of reports in accordance with the applicable regulations and the Group's ethical rules.

The integrity and confidentiality of the information collected in a report, in particular the identity of the author of the report, the persons concerned and any third party mentioned therein are guaranteed.

All recipients of the alerts received ensure compliance with the applicable legal obligations and the charters, policies and internal regulations of the Média-Participations Group.

Access to whistleblowing reports that fall within the scope of whistleblower protection is only allowed to authorized members. Information relevant to the investigation may be communicated to third parties if this is necessary to process the report.

In the event of an alert that interferes with one of the recipients, he or she will be removed from the investigation in order to preserve independence and impartiality in the management of the alert.

EXTERNAL REPORTING

Whether or not an internal report has been made, it is possible to use external reporting.

❖ To whom should the report be addressed?

The external report can be sent to:

- To one of the authorities mentioned by Decree No. 2022-1284.
- To the judicial authority.
- To the competent institution of the European Union.

❖ Who should I turn to if I have difficulty determining the competent authority?

In the event of difficulty in determining the competent authority, it is always possible to contact the Defender of Rights, who will direct you to the authority best able to deal with the alert. The referral to the Defender of Rights can be made:

- By filling in the electronic form available on the website of the Defender of Rights: www.defenseurdesdroits.fr / "Refer the matter to the Defender of Rights".
- By free mail, without postage: Défenseur des droits - Libre réponse 71120 - 75342 Paris CEDEX 07
- By phone on 09 69 39 00 00, Monday to Friday from 8:30 a.m. to 7:30 p.m. (cost of a local call).

❖ Practical tips for sending documents

- Always prefer to send by registered mail with acknowledgement of receipt.
- Send only copies, keep your originals.
- Use the double envelope system:

Insert the elements of your report in a closed envelope marked "REPORT AN ALERT" only.

Insert this envelope into a second envelope on which the address of the authority entered for the processing of the alert appears. This ensures that only authorized individuals will have access to the confidential information in your alert.

PUBLIC DISCLOSURE

Public disclosure, which consists of bringing the alert to the public's attention, is only possible in five cases:

❖ You have made an external report :

- To one of the competent authorities listed by the decree, and no appropriate response has been given to you within 3 months of the report.
- To the judicial authority, an institution of the European Union, or the Defender of Rights, and no appropriate response has been given to you within 6 months of the report.

❖ The information is not likely to harm the interests of defense and national security, and you have not made an external report because:

- Presence of a serious and imminent danger for alerts not relating to information obtained in a professional context.
- Presence of an imminent or manifest danger to the public interest (emergency situation) for alerts relating to information obtained in a professional context.
- Risk of retaliation by referring the matter to an external authority, or the external authority would not effectively remedy the subject matter of the report.