

CODE OF ETHICS

2024 VERSION

COMPLIANCE DEPARTMENT
NOVEMBER 2024

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FOREWORD: Ethics are a catalyst for our collective success

The Group has grown rapidly in recent years to become a major production and distribution group in France and internationally.

However, this success cannot allow us to forget the essential values that must underpin our day-to-day actions. Being a leading content production and distribution group also carries with it an obligation: we must uncompromisingly adhere to ethical values, a prerequisite for earning the trust of our viewers, customers and partners, as well as our shareholders and investors.

Placing ethics at the heart of our business conduct is essential to keeping this trust and uniting all employees around core shared values, which apply in all circumstances and in all countries.

In a rapidly changing media landscape marked by the emergence of new players, implementing actions guided by ethical principles must be central to our strategy, now more than ever.

Ethics are everyone's concern, regardless of their position or responsibilities, and must guide our conduct each day. If you have any doubts or questions about how to apply these principles to your activities, do not hesitate to reach out: your line managers, colleagues and compliance officers, the legal and HR departments, NEWEN's Group Compliance Officer, as well as the TF1 group Head of Compliance & Competition and Ethics Officer, are all available to assist and guide you through this process.

I am counting on each and every one of you to make this Code of Ethics your own, to circulate it widely both inside and outside the Group, and to comply with it scrupulously. Everyone's commitment to ethical conduct is without a doubt an essential driver of progress and excellence, and a guarantee of our collective success. I know that each of you will take this commitment to heart.



**Pierre Branco, Chief Executive Officer of
Newen Studios**

A handwritten signature in black ink, appearing to read 'Pierre Branco', written in a cursive style.

DEFINITIONS

Senior executive: means the directors and corporate officers of each Group Entity.

Entity: means the French- and foreign-law companies and Entities that are directly or indirectly "controlled" by the Group.

Group: means all companies of the NEWEN Group, which includes NEWEN STUDIOS and all Entities. "Control" has the meaning provided in Articles L. 233-3 and L. 233-16 of the French Commercial Code considered together and, therefore, covers both de jure and de facto control.

Manager: each Entity defines the concept of "manager" applicable to its scope based on its processes and activities.

TF1 group Ethics Officer and Head of Compliance & Competition: the Ethics Officer was appointed by the TF1 group's Board of Directors on the recommendation of the Ethics, CSR and Patronage Committee, and is also the TF1 group's General Counsel. She is responsible for rolling out and implementing the Code of Ethics, the Anti-Corruption Code of Conduct and the Group's compliance programmes and policies. She is assisted by the TF1 group Head of Compliance & Competition, who is responsible for operational implementation of these issues.

Compliance Officer: the Compliance Officer is the Group's Legal Affairs Director. She is responsible for implementing and overseeing the Code of Ethics, the Anti-Corruption Code of Conduct and the Group's compliance programmes and policies. She is the primary contact for Group employees for all ethics-related questions.

I. CODE OF ETHICS: WHAT IS IT FOR?

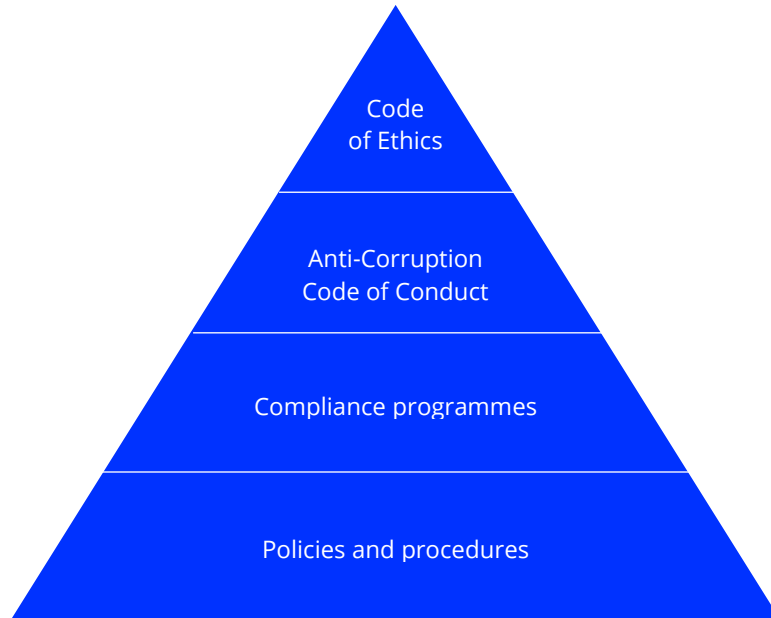
The Group's reputation and robustness hinge on the confidence of its stakeholders, its employees and senior executives, which in turn stems from respect for the core shared values of respect, integrity and responsibility. These values are intended to guide the Entities in all their business dealings.

This Code of Ethics aims to ensure that everyone adopts the appropriate behaviour at all times. Its purpose is to bring together the Group's senior executives and employees around shared values. These values must underpin the decisions we have to make on a day-to-day basis, whatever our level of responsibility.

The resulting principles of action are clarified in the Anti-Corruption Code of Conduct, a practical guide setting out the behaviour to adopt in all situations that might breach the ethical rules and, therefore, our core shared values.

Furthermore, compliance programmes¹, policies² and procedures have been drawn up to deal more specifically with certain issues that are key for the Group or that are specific to certain Entities, with the input of those Entities.

The Anti-Corruption Code of Conduct, compliance programmes and policies form an integral part of the Code of Ethics and constitute its implementation guidance.



(1) As of the date hereof, these compliance programmes are "Embargoes, Economic Sanctions and Export Restrictions", "Competition", "Financial Information and Securities Trading" and "Conflicts of Interest".

(2) As of the date hereof, the "Gifts and Hospitality" policy.

II. CODE OF ETHICS: WHO IS IT FOR?

This Code of Ethics applies to all employees and senior executives of the Group¹ in the course of their activities, regardless of the Entity, project or country concerned.

It is intended to be shared with all stakeholders with whom we interact. We expect them to comply with it or to apply standards that are least equivalent to those set out in our Code of Ethics.

The Group's senior executives are responsible for ensuring that the Code of Ethics is fully and properly applied. They are supported in this by the TF1 group Ethics Officer, who makes sure that it is implemented on a day-to-day basis and is understood and embraced by everyone.

(1) In the case of a joint venture controlled jointly by a Group Entity and a partner, if it is not possible to require compliance with this Code of Ethics, the partner should be asked to make a contractual undertaking to respect standards that are at least equivalent to those set out in this Code of Ethics.

III. ETHICAL MANAGEMENT

The Group believes that exemplary leadership should form the foundations of any ethical approach. Employee engagement stems from management's respect for and embodiment of the Group's ethical values and culture.

Senior executives and managers must not only observe the highest ethical standards but also pass on this message to their employees.

They are therefore expected to lead by example and, in particular:

- they must not do anything that is contrary to the provisions of this Code of Ethics;
- they must be fair and refuse to tolerate any form of discrimination, and must treat all employees equally and fairly;
- they must make self-respect and respect for others a managerial priority and refuse to tolerate any form of harassment, including all sexist or insulting comments and any behaviour that could threaten human dignity by creating an intimidating, hostile, humiliating or offensive environment; and
- they must react immediately and take whatever measures are required in response to situations in breach of management ethics.

IV. SHARED VALUES

Acting with respect, integrity and responsibility

1. RESPECT

Respect is one of the Group's key values and must guide everyone in their individual behaviour, whether internally in dealings with the Group's employees and senior executives, or externally in dealings with stakeholders and all third parties.

All Entities must ensure that everyone with whom they interact is treated with respect and dignity.

EMPLOYEES AND SENIOR EXECUTIVES

Human resources management, the coordination of Group employees and relations between employees (whether vertical or horizontal) are based on the principles of mutual trust and respect, as well as treating others with dignity.

The Group seeks to apply a fair human resources policy, with no distinction based on gender, ethnic origin, religion or beliefs, disability, state of health, age, physical appearance, sexual orientation, family circumstances, nationality or whistleblower status. It promotes gender equality in all areas (training, job grade, promotion, internal job mobility, pay, etc.), as well as diversity of backgrounds and qualifications.

All psychological and sexual forms of harassment, coercion and bullying are prohibited. The Group is particularly committed to combating all forms of physical violence or bullying in the workplace that constitute harassment or inappropriate behaviour. The Group's commitment in this area is reflected in a number of initiatives, such as the adoption of a procedure for identifying and handling acts of workplace harassment and violence, NEWEN's signature of the charter drafted by the "For Women in the Media" association¹, etc.

The quality of life at work and preventing psychosocial risks are priorities for the Group.

Ensuring and improving the safety of employees in the performance of their duties is an ongoing concern.

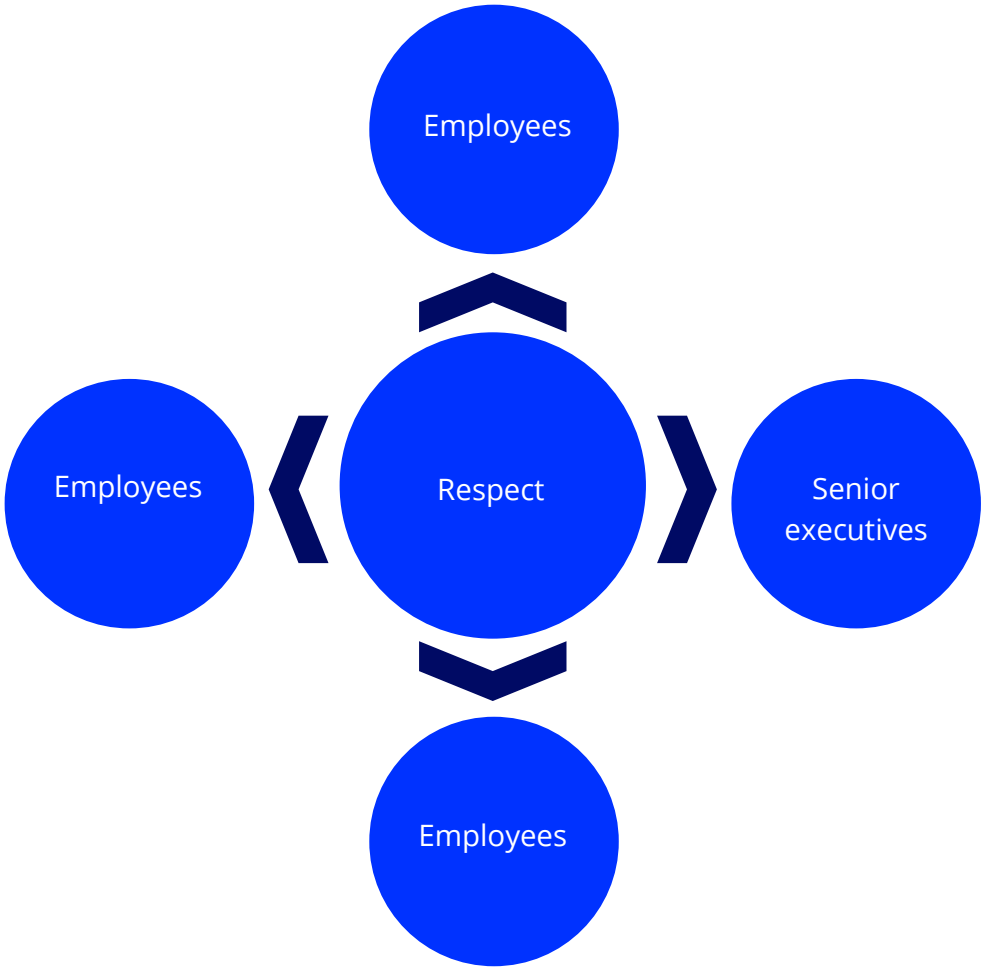
The Group also seeks to respect the private lives of its employees and senior executives, including their personal data and computer files, and ensures their health and safety

¹ A good conduct charter against sexual harassment and sexist behaviour in media-related professions, which supplements existing statutes and regulations.

during the course of their activities.

Reciprocally, the Group expects its employees and senior executives to show respect on a day-to-day basis, whether:

- **Internally**, in dealings with their colleagues, line managers and subordinates; or
- **Externally**, in dealings with other stakeholders (TV viewers, users, producers, authors, advertisers, authorities, customers, suppliers, shareholders, etc.).



STAKEHOLDERS

Respect is at the heart of the Group's relationships with its various stakeholders (producers, authors, authorities, customers, suppliers, shareholders, government agencies, non-profits, etc.). Thus, the Group makes sure that all of its dealings with them are conducted honestly and fairly, regardless of the contact person.



Reciprocally, the Group expects all its stakeholders to show mutual respect.

Lastly, the Group promotes its commitments in terms of respect for human rights by complying with the following principles and agreements:

- Principles of the United Nations Universal Declaration of Human Rights;
- Fundamental conventions of the International Labour Organisation (ILO), in particular with regard to forced labour and child labour;
- Principles of the United Nations Global Compact.

The Group has adopted a number of measures to promote diversity and inclusion in its HR practices, management and culture. Under the impetus of the Diversity & Inclusion Committee (CODIVIN), a number of initiatives are being implemented to promote gender equality and the inclusion of people with disabilities, people with limited access to culture, LGBTQ+ people, and others. The HR team also works to prevent discrimination and is planning other initiatives that foster inclusion.

2. INTEGRITY

The Group places a high value on strict compliance with laws, regulations and internal standards, particularly as regards the fight against corruption and influence peddling; competition law; stock market regulations; economic sanctions; prevention of conflicts of interest; human rights; fundamental freedoms; environmental protection; health, safety and security in the workplace; and personal data protection.

To that end, the Group has published various documents describing the rules to be applied by senior executives and employees on a day-to-day basis. All of those rules are set out in the Anti-Corruption Code of Conduct and the various compliance programmes, which, if needed, may be supplemented by other documents such as policies, procedures or recommendations.



The Group organises training for employees and senior executives to ensure that they do not engage in any illicit behaviour for which they, other employees and senior executives, their Entity and/or its shareholders may be held liable.

Thus, we expect all employees and senior executives to:

- have a minimum knowledge of the regulations that apply to their business sector;
- regularly question the legality of their actions; and
- seek advice from (i) their line management, (ii) their Compliance Officer, who is assisted by the TF1 group Head of Compliance & Competition, as well as the Ethics Officer, and (iii) if necessary, their Human Resources manager.

Failure to do so may lead to internal sanctions and/or sanctions imposed by the competent legal and administrative authorities, which could therefore generate a potentially significant reputational risk.

If they have any questions about this Code of Ethics or about ethics in general, employees should contact (i) their line management, (ii) their Compliance Officer, who is assisted by the TF1 group Head of Compliance & Competition, as well as the Ethics Officer, or (ii) their Human Resources manager to obtain further clarification about these standards and the actions they should take.

3. RESPONSIBILITY

All senior executives and employees have a duty to respect a professional ethic based on the Group's shared values, the rules and principles of action set out in this Code of Ethics, the Anti-Corruption Code of Conduct, the Group's compliance programmes and policies, as well as the Group's procedures where applicable.

Senior executives and managers are also ambassadors for this Code of Ethics. They are therefore responsible for initiating communications, awareness and training actions to help employees embrace the Group's ethics culture.

This responsibility is all the more important because failure to respect the rules set out in this Code of Ethics could lead the Group to take civil action against employees or senior executives who deliberately breach the rules.

Furthermore, the Group's actions also include a social responsibility, of which all employees and senior executives should be aware.

Growth in our business is contingent on strong, unconditional acceptance of international Corporate Social Responsibility (CSR) standards.

Finally, mindful of its impact on society and the role a media group plays in promoting

social cohesion, the Group actively supports numerous charities. Charitable contributions and patronage initiatives are authorised if they effectively serve a cause of general interest and contribute to community action initiatives as defined by the Group or its Entities.

4. RELIABILITY

Each Group employee who participates in the production of programmes contributes to ensuring that the commitments made to the community are respected, i.e. that programmes comply with the Group's ethics and compliance commitments, in particular that information broadcast is reliable, trustworthy, of high quality and presents a diversity of views, and that the programmes and performances offered are inclusive and non-discriminatory, promote solidarity and social cohesion, and raise awareness of major environmental issues, with a constant concern for maintaining a dialogue with all its audiences.

V. EVERYDAY PRINCIPLES OF ACTION

1. EMPLOYEE AND SENIOR EXECUTIVE ETHICS

The performance of the Group is dependent on the ethics of its employees and senior executives.

Employees must, under all circumstances, be loyal and be guided by the interests of the Group. The quality of the Group's image and the reputation of its programmes, services and products are essential for its development and long-term future.

We expect all employees and senior executives to:

- **be loyal and respect the higher interest** of their Entity and the Group;
- **fulfil their commitments** internally and towards third parties;
- **refrain from denigrating** their Entity or the Group; and
- **embody the Group's shared values**, both internally and in dealings with other stakeholders, in particular as regards:



RESPECT FOR HUMAN RIGHTS

Each year, the Group contributes to the vigilance plan that is drawn up by its shareholder. This plan sets out the reasonable measures to be taken to identify risk and prevent serious violations of human rights and fundamental freedoms caused by the activities of the Group or the subcontractors and suppliers with which it has an established business relationship. Senior executives and employees are expected to read and comply with the vigilance plan relating to the Group's scope, in particular as regards human rights, in the course of their activities.



RESPECT FOR THE ENVIRONMENT

The Group aims to observe best practices in environmental protection. In response to the climate crisis, the Group has made concrete commitments to reduce its greenhouse gas emissions by 30% by 2030 and has set itself objectives compatible with the Paris Agreement, which have been validated by the SBTi. Employees and senior executives should be aware of the role they have to play in this area. At their own level, they should ensure that their activities minimise their effects on the environment by considering how best to preserve biodiversity, protect natural resources and manage waste.

In 2023, the Group launched its sustainable production charter. Designed in line with the recommendations of Ecoprod, a leader in

this field, the Group's charter is a sustainable production guide for all the Group's productions, from the launch of a project to the end of filming. Sustainable production principles are incorporated from the outset as scripts are crafted, drawing on writing skills and reflection with the aim of encouraging environmentally friendly solutions. The project's governance structure is then defined and an environmental officer is appointed, who is tasked with coordinating the project in collaboration with production. The Group has been a pioneer in this area, appointing its first Carbon Manager in 2022.

Essential aspects of sustainable production include actions focusing on transport (for example, choosing trains over planes for team travel), resources and waste, catering (seeking local, seasonal and/or vegetarian options) and energy (encouraging energy savings and renewable options).

In 2022, the Group also set up a Green Committee, which carries out a wide range of initiatives to protect the environment.

The Group is a founding member and sits on the Board of Directors of the Ecoprod association, which offers tools for measuring and reducing the environmental footprint of audiovisual shoots, for use by both in-house and external productions.

The Group aims to meet the best standards in the field of environmental protection at its headquarters. Reducing water and energy consumption and the management of waste and toxic substances are concerns that are common to all Group employees. Waste reduction and sorting and energy consumption are two areas in which employees are involved, in accordance with the procedures set up by the General Affairs department.

HEALTH AND SAFETY



Preventing the risk of accidents and occupational illnesses is of paramount importance for the Group. It requires everyone to follow all health and safety rules scrupulously. Employees and senior executives should, therefore, regularly consult the instructions on display concerning the Group's safety systems and arrangements.

PARTICIPATION IN PUBLIC LIFE AND CORPORATE NEUTRALITY



The Group respects the commitments of its employees and senior executives who participate in public life. There must be no discrimination against employees or senior executives who are candidates for an election or who hold a political office. The Group seeks to maintain a neutral political stance. Employees and senior executives may therefore exercise their freedom of opinion and political activity outside the workplace, at their own expense and on a strictly personal basis. They must not involve the Group or any of its Entities, in particular by disclosing their ties with the Group. To that end, all employees and senior executives should ensure that they observe the Conflicts of Interest Compliance Programme. Likewise, no Group assets must be used for political activities.

The Group respects the beliefs of its employees and senior executives when expressed in a private capacity. The principle of neutrality in the expression of political, religious or philosophical beliefs must be respected and no form of proselytising in the company will be tolerated.

Moreover, the Group does not directly or indirectly contribute to the financing of political parties or politicians, as required by law.

MANAGING CONFLICTS OF INTEREST



Given their duty of loyalty, employees and senior executives should take care to avoid conflicts of interest, whether direct or indirect, with their Entity or the Group. As required by the Conflicts of Interest Compliance Programme, they must inform their line manager of potential or actual conflicts of interest they face, without omitting any facts. In such a situation, they may not act or intervene as a representative of the company. They must also refrain from participating in any decision-making process involving the issue that generated the conflict of interest.

In accordance with the rules in effect within the company, all employees are required to provide the Group with all information that may be necessary to verify that they do not have any conflict of interest.

ZERO TOLERANCE FOR ALL FORMS OF CORRUPTION, INFLUENCE PEDDLING AND FRAUD



The Group has adopted a zero tolerance policy in these matters. Employees and senior executives are therefore expected to avoid any behaviour that could be considered as corruption, influence

peddling or fraud. The Group's Anti-Corruption Code of Conduct sets out the standards and practices to be observed.

Fraud – that is to say any act or omission with intent to deceive (falsification, dissimulation, lying, etc.) – both internally and externally, is unacceptable and breaches the Group's values. All employees must, under all circumstances, observe the highest standards of honesty and integrity in their relations with co-contractors and customers.

RESPECT FOR PERSONAL DATA REGULATIONS



The Group complies with all regulations governing the protection of personal data, in particular the General Data Protection Regulation (GDPR). It has also appointed a Data Protection Officer and adopted a data protection policy. Employees and senior executives are expected to apply the relevant standards in this field, to make sure that all personal data gathered in the course of their activities is treated appropriately and, in particular, to:

- have the requisite minimum knowledge of the policies adopted by the Group in this area;
- take the mandatory training courses offered by the Group;
- remain vigilant by regularly ensuring that their actions are in compliance with the Group's personal data protection policy;
- seek advice from their line manager, data contact, legal department or the Data Protection Officer if necessary.

FINANCIAL REPORTING AND INFORMATION



The Group strives for transparency and reliability in its financial reporting. Employees and senior executives are expected to observe professional discretion and not disclose any financial information they hold on account of their duties to parties outside the Group. In addition, they must not pass on such information to employees or senior executives of the Group who are not authorised to have it. Furthermore, only persons with the requisite authority by virtue of their positions within the Group may carry out external communication activities.

As stated earlier, the press company status of certain Group Entities confers on its news staff a special responsibility in terms of professional ethics, in accordance with the Law of 1881 on freedom of the press and the agreements signed with the ARCOM.



PREVENTING INSIDER DEALING

Employees and senior executives should take great care when trading in the securities of the Group's shareholder or a company involved in a transaction with the Group's shareholder. A compliance programme has been drawn up for this purpose.



RESPECT FOR COMPETITION LAW

The Group complies with competition law (prohibition of collusion and abuse of dominant position, and all other practices contrary to competition law). The behaviours to adopt are set out in a specific compliance programme. In particular, employees and senior executives must refrain from any behaviour aimed at or having the effect of preventing, restricting or distorting competition in the markets.

Competition law is complex and subject to change, and violations are subject to administrative, criminal and/or civil penalties. Therefore, employees should contact the legal departments if they have any doubts or questions.



EMBARGOES, ECONOMIC SANCTIONS AND EXPORT RESTRICTIONS

Due to its international reach and the nature of its business activities, the Group is expected to comply with regulations on embargoes, economic sanctions and export restrictions. To that end, it has drawn up a specific compliance programme, with which all employees and senior executives must comply.



PROTECTION OF ASSETS

Employees and senior executives must safeguard the integrity of the Group's tangible and intangible assets, regardless of their origin, nature or purpose. This includes economic rights in works, copyright, intellectual and artistic property rights, neighbouring rights, ideas or know-how, customers, market information, technical or commercial practices, statistical data, movables and property assets, etc. Employees and senior executives remain bound by this duty even after leaving the Group. The Group's assets may not be used for unlawful purposes or for purposes that are not connected with its activities (use for personal purposes or making them available for use by other parties).

In particular, it should be noted that intellectual, industrial and artistic property works (cinematographic, audiovisual, musical and other works) to which Group employees have access are protected

works whose use or reproduction on any medium is strictly prohibited, including for distribution within the company, except for strictly business purposes and subject to compliance with all rules in effect within the company.

Similarly, all employees are responsible for their use of the company's tools in the performance of their duties within the Group. This use is governed by the "Rules on the Use of Information and Communication Technologies", which are appended to the company's internal rules of procedure, as well as the "Rules on the Use of AI within the Bouygues Group".



INTRA-GROUP SOLIDARITY

We set great store by the wealth of our business segments and we wish to preserve a relationship of internal solidarity. Thus, when several Group Entities forge a business relationship between them, they are guided by the same duty of loyalty as they have towards their customers, suppliers or external partners.

All employees and senior executives, albeit bound first and foremost to safeguard the interests of their own Entity, should also ensure that intra-Group relations are excellent and run smoothly, regardless of the area involved.

2. STAKEHOLDER ETHICS

Our Group owes its success to the confidence and ethics of its stakeholders.

The diversity of our stakeholders is an asset for the Group. Customer satisfaction is key to our long-term future and success.

Quality is therefore one of our strategic concerns. We urge all employees and senior executives to strive for continuous improvement in quality, while complying with the applicable standards on health, safety, ethics and the environment.

SUPPLIERS AND SUB-CONTRACTORS

We respect our suppliers and sub-contractors and we endeavour to ensure that our business relationships are fair and professional. We therefore urge all employees and senior executives to:

- seek to create a fair framework for negotiations in all circumstances; and
- govern relationships with third parties through clear contracts.

In exchange, we expect our suppliers and sub-contractors to comply with principles at

least equal to those set out in the Code of Ethics and the CSR Charter for Suppliers and Sub-Contractors. They must use their best efforts to ensure that their own suppliers and sub-contractors do likewise.

GROUP SHAREHOLDERS

Shareholder confidence is a key factor in the success of the Group. This is achieved through ongoing constructive dialogue and the regular provision of accurate, high-quality information.

We undertake to ensure that all of the Group's operations and transactions comply with stock market regulations. These operations and transactions are recorded accurately and fairly in the accounts of each Entity, in accordance with applicable regulations and internal procedures.

VI. IMPLEMENTING THE CODE OF ETHICS

The Group provides everyone with the practical means to implement the Code of Ethics.

1. IMPLEMENTING THE CODE OF ETHICS IN THE GROUP

The Group's Entities are responsible for implementing this Code of Ethics, as well as the Anti-Corruption Code of Conduct and the Group's compliance programmes and related policies.

If these documents need to be supplemented due to the legal, practical or geographical specificities of an Entity's activities, the Entity may seek advice from the Compliance Officer, who must refer the matter to the TF1 group Ethics Officer and the Head of Compliance & Competition. The Ethics Officer will prepare any necessary additions with the input of the relevant Entity. However, any such additions must not breach the values and principles set out in this Code of Ethics.

For ease of implementing the Code of Ethics, the compliance programmes and related policies are available at all times to the Group's employees and senior executives on their intranet or by any other means decided by the Entities.

2. ETHICS, CSR AND PATRONAGE COMMITTEE

The TF1 group has an Ethics, CSR and Patronage Committee reporting to the Board of Directors. It meets regularly to address all ethics issues, in particular those that concern the Group. It contributes to defining the rules and action plans underpinning the conduct of senior executives and employees. In particular, the Ethics, CSR and Patronage Committee assesses the mechanisms in place to prevent and detect corruption.

3. EXCHANGE AND PREVENT

Our priority is to create a climate of dialogue within the Group. We are aware that it is not always easy to implement the Code of Ethics on a routine basis and that it may raise questions. We want everyone to be able to express their opinions and concerns about the Code of Ethics in the firm belief that they will be heard and supported by their line managers.

In case of doubt or uncertainty, employees or senior executives should contact their line manager or legal department, or their Compliance Officer, who is assisted by the TF1 group Head of Compliance & Competition and Ethics Officer.

We also invite our stakeholders, if they have any questions about the proper application of the Code of Ethics and compliance arrangements, to contact the Compliance Officer, who will, if necessary, refer the matter to the TF1 group Head of Compliance & Competition and the Ethics Officer.

4. BEING RESPONSIBLE ALSO MEANS RAISING THE ALARM

If employees feel uncertainty or doubt as to how to behave when faced with specific situations, they are requested to consult their line management and/or the legal or human resources departments, or the persons in charge of sustainable development.

We encourage employees (including external or occasional workers) and senior executives to flag any ethics issues to their direct or indirect line manager, their legal department, Compliance Officer, Human Resources manager or the Entity's senior executives and, if necessary, the TF1 group Head of Compliance & Competition and the Ethics Officer, allowing sufficient time for them to give relevant advice or to take an appropriate decision.

They may also use the whistleblowing platform (<https://tf1.besignal.com/entreprises>) set up by the Group in accordance with applicable laws.



The whistleblowing facility guarantees that the identity of both the whistleblower and the person implicated will remain strictly confidential. In any event, the person who receives the alert is required to take measures to protect the identity of both the whistleblower and the person implicated when receiving, processing and retaining the alert.

A whistleblower who acts in good faith and without direct financial incentive will not be liable to discriminatory or disciplinary measures of any kind. The procedure for dealing with alerts raised under the whistleblowing facility is described in the appendix to this Code of Ethics entitled "Whistleblowing Facility – Internal Procedure for Receiving and Processing Whistleblowing Alerts".

V. ANNEX: WHISTLEBLOWING FACILITY – INTERNAL PROCEDURE FOR RECEIVING AND PROCESSING WHISTLEBLOWING ALERTS

DEFINITIONS

Designated recipient: in principle, the designated recipient is the TF1 group Ethics Officer. It may also be the whistleblower's line manager, the head of Human Resources, the Compliance Officer, the TF1 group Head of Compliance & Competition or the Legal Affairs Director of the relevant Entity or Group. In that capacity, the designated recipient has the competence, authority and sufficient resources to receive and process whistleblowing alerts impartially.

Facilitator: means any natural person or private not-for-profit organisation that assists the whistleblower in raising a concern or reporting a breach.

Whistleblower: means any natural person who reports or discloses, in good faith and with no direct financial incentive, information about a crime or offence, a threat or harm to the general interest, or a violation or attempt to conceal a violation of an international commitment duly ratified or approved by France or a unilateral measure adopted by an international organisation on the basis of such a commitment, European law or applicable statutes and regulations.

Whistleblowing platform: refers to the

platform set up by the Group to receive and process all whistleblowing alerts. The platform can be accessed at <https://tf1.besignal.com>

1. RAISING A WHISTLEBLOWING ALERT

An alert must be raised in good faith and without direct financial incentive.

If the information underlying an alert has not been obtained by the whistleblower in the course of his or her activities, the whistleblower must have witnessed the reported events first hand.

2. GROUP ALERT

If the whistleblower believes that the situation goes beyond the scope of the TF1 group, he or she may report the alert to the Bouygues group Ethics Officer instead of the TF1 group Ethics Officer. Likewise, the TF1 group Ethics Officer may pass on an alert to the Bouygues group Ethics Officer if she believes that the situation goes beyond the scope of the TF1 group.

3. HOW TO RAISE AN ALERT

• **Method:** the whistleblower may raise an alert in writing or orally, but is nonetheless advised to use the confidential and secure whistleblowing platform. A written alert may be sent via post or e-mail, preferably encrypted. An oral alert may be raised by telephone, voice message or, at the whistleblower's request, by videoconference or in a face-to-face meeting that will be held no later than twenty business days after receipt of the request. Oral alerts are registered either by recording the telephone conversation on a

durable medium that can be retrieved with the originator's consent, by a full transcription of the conversation, or by drawing up a full report of what was said. The whistleblower has the right to check, rectify and approve the transcription or report by signing it. In any event, recordings, transcriptions and reports may only be kept for the time strictly necessary and proportionate for the purpose of processing the alert and protecting the originators, the persons implicated and any third parties mentioned.

Furthermore, if the alert is not raised on the whistleblowing platform, it may be transferred to it, provided that the whistleblower is notified and that his or her anonymity is maintained if requested.

- **Subject heading:** the subject heading or the content of the letter or e-mail must clearly indicate that an alert is being raised under the whistleblowing facility.
- **Whistleblower's identity:** the whistleblower may provide all information about his or her identity (first and last name, Entity, position, e-mail address, telephone numbers, etc.). Alerts may also be raised anonymously. Using the whistleblowing platform guarantees the whistleblower's anonymity. In any event, a whistleblower who wishes to remain anonymous should provide the designated recipient with the means to contact him or her to facilitate the investigations of the facts reported. If the whistleblower uses the whistleblowing platform, he or she may access the alert raised using an individual user ID.
- **Assistance:** the whistleblower may be assisted by a facilitator when raising an alert or disclosing a breach. The facilitator will be protected in the same way as the whistleblower.

4. CONTENT OF THE ALERT - DESCRIPTION OF THE FACTS OR EVENTS

The whistleblower must provide a clear, impartial description of the events and information being reported.

The designated recipient will only consider information directly related to the areas covered by the whistleblowing facility and that is strictly necessary to verify the substance of the report and investigate the allegations.

The whistleblower must, in all circumstances, treat the report and the identity of the person implicated in the strictest confidence.

5. PROOF - DOCUMENTATION

The whistleblower should provide any documents, information or data he or she has to support the allegations, whatever the format or medium.

Any document, information or data provided in the report that does not fall within the scope of the whistleblowing facility will be destroyed or archived immediately by the designated recipient, unless the relevant Entity's vital interests or the physical or mental well-being of its employees are at risk.

6. INFORMATION GIVEN TO THE WHISTLEBLOWER

After receipt of the alert, the whistleblower will receive the following in writing:

- acknowledgement of receipt within no more than seven days;

- if applicable, a request for any other information that might be required for the alert to be processed.

Within no more than three months, the whistleblower will also receive information about the action envisaged or taken to:

- assess the accuracy of the allegations made; and
- remedy the matter raised in the alert.

7. CONFIDENTIALITY GUARANTEE

Alerts are received and processed in a way that guarantees the strict confidentiality of:

- the whistleblower's identity;
- the identity of the persons implicated in the whistleblowing alert;
- the identity of anyone else mentioned in the alert;
- documents, information or data provided in the report.

The designated recipient will take all necessary measures to protect the security and confidentiality of any document, information or data provided, not only when the alert is first received but also during the investigations and as long as such information is retained. Anyone who learns about the alert and its contents, particularly during the investigations, is bound by the same strict confidentiality obligations.

More specifically, the whistleblowing platform can only be accessed via an individual user ID and password, which are changed regularly, or by any other means of authentication. Access to data is recorded and the conformity of such access is controlled. The designated recipient and anyone else who knows about the alert and its contents are bound by a heightened

written confidentiality undertaking.

Any information likely to identify the whistleblower may not be disclosed (other than to the judicial authorities) without the whistleblower's prior consent.

Any information likely to identify the persons implicated in an alert may not be disclosed (other than to the judicial authorities) until the merits of the allegation have been established.

Consequently, the following procedure will apply:

- alerts may be raised by any means but preferably via the whistleblowing platform as it guarantees total confidentiality;
- when processing an alert, the designated recipient must never mention the name of, or anything that might identify, the person(s) implicated except, as appropriate, (i) to his or her direct or indirect line manager where necessary for internal investigation purposes, in accordance with applicable legal provisions, (ii) to the TF1 group Ethics Officer or (iii) to the judicial authorities. The direct or indirect line manager of the implicated person(s) and the TF1 group Ethics Officer are bound by the same strict confidentiality undertaking as the designated recipient of the whistleblowing alert.

8. RIGHTS OF PERSONS IMPLICATED IN A WHISTLEBLOWING ALERT

Any person implicated in a whistleblowing alert will be informed by the designated recipient of the whistleblowing alert as soon as their personal data has been logged, electronically or otherwise. He or she has the right to access the data, ask for it to be rectified or deleted if it is incorrect, unclear

or obsolete. These rights may be exercised by contacting the designated recipient.

When protective measures are necessary, particularly to avoid the destruction of evidence about the alert raised, the person implicated will only be informed once those measures have been taken.

The designated recipient will inform the person implicated of the allegations made against him or her. The person implicated may obtain the following information upon request:

- a copy of these rules governing the Group's whistleblowing facility; and
- a copy of the applicable legal provisions on whistleblowing.

The person implicated may under no circumstances obtain disclosure of the whistleblower's identity.

9. HOW A WHISTLEBLOWING ALERT IS PROCESSED

If the designated recipient of the alert is not the TF1 group Ethics Officer, he or she must inform her and obtain her opinion. The designated recipient of the alert may also inform and obtain the opinion of the Ethics, CSR and Patronage Committee.

As part of a preliminary enquiry, the designated recipient will first make sure that the whistleblower has acted within the scope of the whistleblowing facility and in accordance with the applicable regulations. If he or she believes that this is not the case, the whistleblower will be informed promptly of the reasons why the alert is not admissible. The designated recipient may ask the whistleblower for additional information before a full investigation of the merits of the alert is initiated.

When processing the alert, the designated recipient may make any enquiries he or she deems appropriate to assess the merits of

the alert. He or she may involve the line managers of the implicated persons (provided they are not implicated) or any employee whose involvement he or she believes necessary to process the alert, always in the strictest of confidence.

As part of his or her investigations, he or she may call upon any outside service provider, who will act in the strictest confidence.

If necessary, he or she may also ask the whistleblower for further clarification.

If the designated recipient believes that the investigation process will take longer than initially expected, he or she must inform the whistleblower, if appropriate, giving reasons for the extra time needed and the ongoing status of the investigations.

The receipt and processing of a whistleblowing alert will always be conducted on a right-to-reply basis (the adversarial process principle) and in accordance with the provisions of labour law.

The whistleblower may not receive any direct financial incentive for raising an alert.

10. ACTION TAKEN FOLLOWING THE WHISTLEBLOWING ALERT – CLOSE OF PROCEDURE

Once the investigations are complete, a decision will be made on the action to be taken, which may include disciplinary action against the person who has committed or taken part in the wrongdoing and/or, depending on the case, referral of the matter to the administrative or judicial authorities.

The whistleblower will be informed of the action taken following the alert via the whistleblowing platform or by letter or secure e-mail. The whistleblower and the persons implicated will also be informed that the whistleblowing procedure has been

closed.

If, once the investigations are complete, no action is to be taken, the information contained in the original alert identifying the whistleblower and the person(s) implicated will be destroyed or archived promptly (and no later than two months after the investigations have ended).

The information will be destroyed regardless of the medium on which it is stored, including electronic data.

11. CONSEQUENCES OF THE ALERT

In accordance with the applicable legislation, no retaliatory measures, threats, attempted reprisal or sanctions, including disciplinary action, may be taken against a whistleblower or facilitator who acts in good faith and with no direct financial incentive. Furthermore, the whistleblower will not incur any civil penalty if the alert or disclosure was necessary to safeguard the interests in question.

Conversely, anyone who abuses the system or acts with malicious intent will be liable to disciplinary action and, potentially, legal proceedings.

12. CIRCULATION OF THE PROCEDURE

This procedure is an appendix to the Group Code of Ethics. It will be made available to employees by any appropriate means:

- wherever possible, a copy of the Code of Ethics will be provided to all new employees;
- it will be published on the Group's internet and intranet sites; and

- it will be displayed on company notice boards intended for that purpose.

13. LEGAL PROVISIONS

In accordance with the applicable legislation, the whistleblower may raise an alert with the competent external authorities.

This procedure may be adapted, as necessary, where the local legal provisions are more restrictive.

LIST OF ETHICS OFFICERS (BOUYGUES GROUP, TF1 GROUP) WHO ARE DESIGNATED RECIPIENTS OF WHISTLEBLOWER ALERTS

Position Name	Contact details (France)
TF1 group Ethics Officer	Julie Burguburu E-mail: alerteprofessionnelle@tf1.fr Address: 1 quai du Point du Jour 92100 Boulogne-Billancourt, France
Bouygues SA group Ethics Officer	Didier Casas E-mail: alerte@bouygues.com Address: 32 avenue Hoche 75378 Paris Cedex 08, France Tel.: +33 (0)1 44 20 10 18

OTHER INTERNAL CONTACTS FOR ADVICE

Position Name	Contact details (France)
NEWEN Compliance Officer	Julie Delormeau Documentations.juridique@newenstudios.com
TF1 group Head of Compliance & Competition	Christelle Bonnin Ethique-compliance@tf1.fr

IMPORTANT NOTICE

This document provides an overview

of the rules in effect at 30 January 2022.

It will be revised as necessary and the amendments will be posted only on the intranet.

2014 • Updated: November 2024

The NEWEN group Code of Ethics, Anti-Corruption Code of Conduct and Compliance Programmes (Competition, Financial Information and Securities Trading, Conflicts of Interest, and Embargoes, Economic Sanctions and Export Restrictions) are available on the Group's Intranet.