CODE OF CONDUCT FOR BUSINESS PARTNERS

France Télévisions

Key points from the code of conduct for business partners:

- *To undertake to upholding human rights, health and safety, and environmental protection*
- *To undertake to comply with ethical conduct*
- *To undertake to take the necessary measures to prevent conflicts of interest and to report any situation relating to France Télévisions*
- *To undertake to communicating about France Télévisions' ethical whistleblowing system.*

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France Télévisions undertakes to setting an example that we would like to share with all our partners. Let's all be on our guard! Thank you for your commitment to our cause.

Delphine Ernotte-Cunci

INTRODUCTION

In recent years, the France Télévisions group has been committed to conducting its business in a manner that sets an example, in line with the values and principles of public service.

This commitment was initially reflected in our involvement in the fight against all forms of discrimination based on sex, sexual orientation, gender identity or origin, and in our protection and promotion of diversity.

As a result, France Télévisions has held the Diversity Label since 2014 and the Professional Equality Label since 2018.

On 18 October 2016, France Télévisions SA signed the L'autre Cercle charter of commitment , whichaims to improve the way issues relating to sexual orientation and gender identity are addressed within the organisation, in order to ensure a respectful and non-discriminatory working environment for lesbian, gay, bisexual and transgender people.

In 2019, the France Télévisions group signed the Manifesto for Inclusion alongside more than 100 companies; this proactive initiative aims to promote the employment of people with disabilities, notably by forging links with establishments and services providing support through work (ESATs) and adapted workplaces.

That same year, France Télévisions, together with other leaders in the French broadcasting sector, signed a new charter on the portrayal of people with disabilities and handicaps.

Furthermore, the France Télévisions group, as a founding member in 2009 of the Ecoprod collective, which brings together several major companies from the broadcasting sector, has also made a commitment to environmental protection. The aim of this collective is to provide training and raise awareness, as well as to make tools and guides available to professionals – regardless of the size of their organisations or their specific fields of work – and to offer them the best possible support and advice in their efforts to adopt environmentally responsible practices.

In October 2021, France Télévisions Publicité won gold at the Grand Prix de la Good Economie in the 'encouraging responsible corporate consumption' category. This award recognises FranceTV Publicité's commitment to giving greater prominence to corporate social responsibility. As an advertising agency, it helps to highlight the responsible initiatives of the brands it works with, by enabling them to provide evidence of their actions.

Finally, the France Télévisions group has adopted a plan to set an example, based in particular on a charter of ethics (2017), an anti-corruption code of conduct (2018) and a vigilance plan (2020). This Code of Conduct for Business Partners complements this framework.

Just as it expects all its employees to uphold these values, France Télévisions is committed to sharing the ethical principles set out in this Code of Conduct with all its business partners.

In addition to the principles set out in this Code of Conduct, France Télévisions expects its business partners to comply, in relation to all the topics covered by this Code, with the principles set out in the Conventions of the International Labour Organisation, the Universal Declaration of Human Rights, the United Nations Global Compact and the United Nations Women's Empowerment Principles.

The commitment of business partners to ethical practices is a key criterion in the selection and assessment of such partners. France Télévisions also expects its commercial partners to apply these principles throughout their supply chain.

Definitions

Business partners: The term ‘business partners’ refers to suppliers, subcontractors, service-providers or companies with which France Télévisions has a business relationship.

Workers: a ‘worker’ is defined as any person working on behalf of a business partner under an employment contract, a temporary agency contract, or on an ad hoc basis (daily, seasonal), whether full-time or part-time.

Employees: the term ‘employee’ refers to any person working on behalf of France Télévisions under a fixed-term or permanent employment contract, whether full-time or part-time.

HUMAN RIGHTS – SOCIAL RESPONSIBILITY AND LABOUR STANDARDS

General rules

Child labour:

France Télévisions will not resort to child labour, and will not tolerate its commercial partners resorting to it. Child labour is defined as 'any form of work carried out by a child under the age of 15, with the exception of work carried out as part of vocational training or a training programme'.

Business partners must comply with the standards set out in International Labour Organisation Conventions Nos. 138 and 182, as well as in the United Nations Convention of 20 November 1989 and the loi Texier (Texier Act) No. 99-478 of 9 June 1999.

Forced labour:

The use of forced labour, slavery, servitude or human trafficking, as well as the withholding of identity documents or work permits, the requirement to pay a security deposit or any other form of coercion whatsoever, are strictly prohibited.

The same applies to work carried out to repay a debt to an employer or a third party, to prison labour, or to involuntary labour whilst in captivity.

Illegal employment:

Illegal, clandestine, undeclared and concealed work, as well as any circumvention of both French legislation and international standards (ILO Convention No. 29), are strictly prohibited.

Working conditions, working hours and pay:

Business partners must comply with applicable national laws and regulations, as well as with international standards in areas not covered by local legislation.

They must also comply with collective agreements, company-level agreements or any other agreements that may apply to them.

Business partners must comply with the maximum working hours, rest periods and the number of days of leave provided for. They undertake to ensure that workers have at least one day off per seven-day period.

Business partners must comply, where required by local legislation, with the minimum wage set and the relevant overtime rates. In the absence of any such provisions in local legislation, business partners must ensure that they pay a wage that is at least equal to the average minimum wage for the sector. Similarly, overtime must be paid at no less than the basic rate.

Business partners shall not impose any financial penalties on their employees.

Discrimination:

Business partners undertake to treat their workers fairly and equally.

No form of discrimination against an employee on the grounds of their origin, sex, lifestyle, sexual orientation, gender identity, age, family circumstances or pregnancy, genetic characteristics, particular vulnerability arising from their economic situation (whether apparent or known to the perpetrator), their belonging or not belonging, whether real or supposed, to an ethnic group, a nation or a so-called race, their political opinions, their trade union or mutual association activities, their holding of an elected office, their religious beliefs, their physical appearance, their surname, their place of residence or their bank account details, or on the grounds of their state of health, loss of independence or disability, or their ability to express themselves in a language other than French, will not be tolerated. Consequently, no person may be excluded from a recruitment or appointment process, or from access to a work placement or training programme in the company; no employee may be disciplined, dismissed or subjected to any direct or indirect discriminatory measure, as defined in Article 1 of Law No. 2008-496 of 27 May 2008 on various provisions adapting to Community law in the field of combating discrimination, in particular with regard to remuneration, within the meaning of Article L. 3221-3, profit-sharing or share-option schemes, training, redeployment, assignment, qualification, classification, career progression, transfer or contract renewal.

Psychological harassment, sexual harassment, sexist behaviour and abuse:

Business partners undertake to treat their workers with respect and dignity.

Any repeated conduct likely to result, for the person subjected to it, in a deterioration of their working conditions that could lead to a breach of their rights and dignity, an adverse effect on their physical or mental health, or a threat to their career progression, is therefore strictly prohibited.

Similarly, sexual harassment – characterised by repeatedly subjecting a person to remarks or behaviour of a sexual or sexist nature that undermine their dignity because of their degrading or humiliating nature, or that create an intimidating, hostile or offensive environment for them – is strictly prohibited. As a reminder, sexual harassment is defined as any form of serious pressure, even if not repeated, exerted with the actual or apparent aim of obtaining an act of a sexual nature, whether such an act is sought for the benefit of the perpetrator or for the benefit of a third-party.

Business partners also undertake to combat sexist behaviour and shall not tolerate or engage in any form of verbal, psychological or physical abuse.

Freedom of trade union organisation and freedom of association:

In accordance with local legislation, business partners recognise and respect the right of workers to freely form or join trade unions, to be represented, to join works councils and to take part in collective bargaining without facing any sanctions, discrimination or harassment. They also undertake not to treat employees who hold staff representative roles less favourably.

Data protection:

The business partners undertake to pay special attention to compliance with the applicable legislative, regulatory, doctrinal and case-law provisions relating to the protection of personal data and privacy.

If data processing is carried out on behalf of France Télévisions, as the data controller, it must be governed by a GDPR Addendum governing data processing by a data processor, provided by France

Télévisions, in accordance with Article 28 of the GDPR, which shall specify, in particular: the personal data concerned, the purposes of the processing, the nature of the data processing and the category of data subjects.

In the event that France Télévisions and a commercial partner are joint data controllers within the meaning of Article 26 of the European General Data Protection Regulation, or are each independent data controllers, France Télévisions and the business partner undertake to consult with one another in order to define and set out their respective obligations in a specific contract.

The business partners undertake to comply with their obligations regarding the protection of personal data in accordance with this code of conduct, any additional provisions set out in contracts, and the applicable regulations. In the event of a breach of these obligations, the data controller is entitled to terminate the contract with immediate effect without any compensation.

The business partners undertake to process data solely for the purpose(s) covered by the contract with France Télévisions, in accordance with the documented instructions of the data controller, whilst ensuring the confidentiality of personal data processed under the contracts through technical and organisational measures.

The business partners may engage a sub-processor to carry out specific data processing activities. In such cases, they shall inform the data controller in advance and in writing, and shall also do so whenever any changes are envisaged regarding the addition of new data processors or the replacement of the data processors originally designated to carry out the processing of personal data.

It is up to the initial data processor to ensure that the subsequent data processor provides the same sufficient guarantees, with regard to the implementation of appropriate technical and organisational measures, so that the processing meets the requirements of the European General Data Protection Regulation. If the subsequent data processor does not comply with its data protection obligations, the initial data processor remains fully liable to the data controller for the performance by the other data processor of its obligations.

A transfer of personal data outside the EU may only take place if, either pursuant to Article 45 of the GDPR, the European Commission has determined by means of a decision that the third country of destination ensures an adequate level of protection (adequacy decision), or pursuant to Article 46 of the same Regulation, the data processor undertakes to provide the appropriate safeguards as set out in Article 46(2)(c) of the GDPR (standard contractual clauses adopted by the European Commission), and provided that data subjects have enforceable rights and effective legal remedies.

Programme-specific rules

As part of our partnerships with programme providers, specific rules may apply, particularly with regard to child labour.

Please note that, in France, there is an exemption to the prohibition of child labour where a child works in a performing arts, film, radio, television or sound recording company, as a model, or for a company or association whose purpose is to participate in video game competitions.

Accordingly, for productions involving children or adolescents, programme producers undertake to obtain all necessary authorisations, in particular from the persons involved in the production, child

protection organisations, and the legal guardians of the children or adolescents participating in the production.

In television programmes, where testimonies from minors are featured, programme producers acknowledge that they have read the CSA deliberation of 17 April 2007 concerning the participation of minors in television programmes, as well as the provisions of the Charter on Testimonies from Minors appended to the contracts, and undertake to append said Charter to the required authorisations referred to above.

For programmes involving children that are filmed abroad, programme producers undertake to comply with local legislation or, where applicable, international legislation, whichever offers greater protection.

Programme producers undertake to respect human rights, including the right to human dignity and the presumption of innocence.

Programme producers – who are true partners of France Télévisions in the implementation of its policy of excellence and its diversity policy – are expected to meet higher standards in the following areas:

Programme producers are committed to combating any form of abuse or discrimination against individuals, in particular on the grounds of their beliefs, gender, origin or lifestyle choices.

They are also committed to supporting France Télévisions in implementing its diversity policy, the five pillars of which are gender equality, ethnocultural and social diversity, disability and LGBTQIA+ representation. To this end, they will ensure that this policy is implemented both in front of and behind the cameras.

Pursuant to Law No. 2005-102 of 11 February 2005 on equal rights and opportunities, participation and citizenship for people with disabilities, and Article L.111-7 of the Building and Housing Code, which requires that all facilities open to the public and all workplaces be made accessible to everyone, and in particular to people with disabilities, whatever their disability, facilities open to the public and workplaces must be made accessible to all, and in particular to people with disabilities, regardless of the nature of their disability, irrespective of whether the owner is a public or private body. Programme producers undertake to use only facilities and installations – such as studios – that meet the requirements of the aforementioned legislation when producing their programmes.

Similarly, the sets must be designed in such a way that, where necessary, they can be used by people with disabilities.

HEALTH AND SAFETY

Health, safety and training:

Our business partners are expected to provide their workers with a safe and healthy working environment.

The risks associated with their activities must be identified and assessed. Business partners must do everything in their power to control these risks and take the necessary precautions to prevent and protect against accidents and occupational illnesses that could be caused by, associated with, or result from their workers' activities, including whilst handling equipment or whilst travelling for work.

Business partners must therefore put in place procedures and training programmes to identify, prevent and minimise, as far as possible, any hazards that may pose a risk to the health, hygiene and safety of staff.

Business partners also ensure that their activities do not harm the health and safety of their subcontractors, those involved in the operation and neighbouring communities.

Business partners must comply with all relevant local and international regulations and laws in this regard. The same rules apply to any accommodation that may be provided by business partners.

ENVIRONMENT

General rules

Improvement process:

Committed to acting as a responsible media organisation and keen to adopt a consistent approach as both a business and a public service broadcaster, France Télévisions follows a social and environmental policy.

In line with the Group's CSR policy, France Télévisions has implements a responsible procurement policy that incorporates sustainable development objectives into its procurement procedures and contracts, with the aim of reconciling social inclusion and progress, environmental protection and enhancement, and economic development.

Business partners must therefore take care to minimise the environmental footprint of the products and services supplied to France Télévisions, in particular by:

- contributing to the fight against and adaptation to climate change by reducing its greenhouse gas emissions;
- the prevention of waste and the sustainable use of resources, based on the principles of the circular economy;
- the protection of ecosystems and biodiversity;
- the prevention and reduction of pollution by reducing discharges into the natural environment (air, water, soil) and other pollutants.

To this end, business partners will ensure that they prioritise the purchase, use or manufacture of eco-products or products bearing labels and certifications (official eco-labels, self-declared environmental claims, eco-profiles).

They are committed to complying with all local and international laws and regulations relating to environmental protection and to continuously minimising the environmental impact of their activities (energy, water, waste, chemicals, air pollution, climate change, etc.) by setting reduction targets to minimise these impacts.

Business partners must promote environmental responsibility within their organisations and encourage the development and use of technologies designed to minimise all environmental impacts throughout their subcontracting and supply chains.

Climate change

Business partners will be required to play an active part in combating climate change by reducing their greenhouse gas emissions (assessing emissions, reducing significant sources of emissions, cutting energy consumption, and opting for less polluting or carbon-free energy sources).

They will also take steps to protect themselves against the consequences of climate change on their business by addressing the issue of adaptation.

Partners must be able to set reduction targets, whether voluntary or resulting from a desire to align with the Paris Agreement on climate change, in accordance with the guidelines for the SBT (Science-Based Target) pathway.

Product traceability:

Business partners must demonstrate full transparency throughout their entire value chain, from the manufacture of the product through to its distribution to France Télévisions, and must be able to provide all the evidence requested to demonstrate that the product can be properly traced.

France Télévisions reserves the right to prohibit any product or method, regardless of any tacit acceptance at the proposal stage by its business partners, who remain bound by their obligation of result.

Transport:

Business partners will need to be mindful of the impact of transport activities. Whether it relates to climate impact (greenhouse gas emissions) or pollution (emissions of fine particulate matter). The transport category covers the company's own travel and that relating to its supply requirements. The business partners undertake to

- use modes of transport that limit the consumption of fossil fuels s

- to use vehicles with the lowest emissions in relation to the defined need and to comply with current standards.

- organise and optimise transport flows in order to reduce their environmental impact.

Resource and Waste Management: Compliance with the principle of the circular economy

Business partners will endeavour to minimise the use of resources (water and raw materials) and to prevent the generation of waste throughout the entire life cycle of their product or service (from the extraction of materials through to the end-of-life management). Adherence to the principles of the circular economy helps to reduce both the pressure on resources and waste generation. Whether it's eco-design, re-use or recycling. For more sustainable use with a lower environmental impact.

With regard to product packaging, business partners will prioritise the use of sustainable materials and the use of packaging that is reusable (a shuttle packaging system), recyclable and/or made from recycled materials.

Programme-specific rules.

As part of our partnerships with programme producers, specific rules may apply regarding the use and treatment of live animals on sets.

Programme producers therefore undertake to comply with, or ensure compliance with, the following legal provisions whenever animals are present on set:

***Article 515-14 of the Civil Code*: 'Animals are sentient beings.'**

***Article L214-1 of the Rural Code*: 'As all animals are sentient beings, their owners must ensure that they are kept in conditions consistent with the biological requirements of their species.'**

***Article 521-1 of the Criminal Code*: "The act, whether in public or in private, of inflicting serious abuse or committing an act of cruelty towards a domestic, tamed or captive animal is punishable by three years' imprisonment and a fine of 45,000 euros."**

***Act No. 2021-1539 of 30 November 2021, applicable from 1 December 2023*: "It is prohibited to feature non-domestic animals, whether in captivity or taken from their natural habitat, in variety shows, game shows other than fiction programmes produced predominantly in a studio, outside the premises of establishments holding the operating authorisation provided for in Article L.413-3 of the Environment Code and broadcast on a television service or made available on an on-demand audiovisual media service within the meaning of Law No. 86-1067 of 30 September 1986 on freedom of communication."**

Furthermore, the programme producers undertake to do their utmost:

- to limit the use of animals on sets, giving priority wherever possible to the use of stock footage, special effects or animatronics;
- if the use of an animal on a set is essential, minimise the time it spends on set and pay the utmost attention to filming conditions (accommodation, on-set care, compassionate methods and respect for the animal's wishes, risk mitigation, etc.)

Furthermore, the programme producers undertake, when using animals in film shoots, to spare them any pain or suffering and to prohibit the use of anaesthesia for narrative purposes (simulation of death, immobilisation, etc.).

The programme producers also undertake to ensure that the selected trainer is able to demonstrate that they possess all the necessary skills and authorisations – in particular, authorisation to keep non-domesticated animals in captivity – that they have no previous convictions for animal cruelty, and that their approach to training complies with the law.

Finally, the programme producers undertake, whenever an animal is the main subject of the programme, to have a veterinary adviser present on set and to appoint a designated person responsible for the animal's welfare.

ETHICS AND ANTI-CORRUPTION

France Télévisions is committed to upholding a set of values and principles, set out in the 'France Télévisions Code of Ethics', in the conduct of its business; these ensure that it acts as a model public service broadcaster.
These principles include, in particular, but are not limited to, compliance within the company and in all dealings with all of the company's contacts and partners with the legislative and regulatory framework governing the public service, as well as the commitment of France Télévisions to conduct its activities with respect for people and the environment.
In producing its content, France Télévisions scrupulously adheres to and ensures compliance with the principles of professional ethics, neutrality and pluralism, as well as the fight against discrimination and the promotion of diversity, as set out in the Broadcasting Charter.

France Télévisions ensures that its activities are conducted in accordance with the applicable procedures, with a constant focus on preventing any conflict of interest and combating corruption in accordance with Law No. 2016-1691 of 9 December 2016, as well as in compliance with the applicable rules on human rights, health and safety, and environmental law.
To formalise these various commitments, France Télévisions has adopted an anti-corruption code of conduct, a vigilance plan and this code of conduct for business partners.

Corruption, facilitation payments and influence peddling:

France Télévisions has a 'zero-tolerance' policy on corruption and influence-peddling.
The business partners undertake to take appropriate measures to prevent, detect and punish any acts that, directly or indirectly, constitute corruption or the misuse of influence within the scope of their activities.
Business partners also undertake not to make facilitation payments, which are regarded as acts of corruption.

Prevention of conflicts of interest:

The business partners undertake to take the necessary measures

- to prevent situations arising that give rise to a conflict of interest,
- to manage situations where conflicts of interest arise in the course of their collaboration with France Télévisions.

To this end, the business partners undertake to notify France Télévisions whenever they recruit a former France Télévisions employee to a post in which that person is involved in, participates in, or may influence business relations between the business partner and France Télévisions.
To do so, they must send an email to the Head of Compliance, Ethics and Professional Conduct at the following address: caroline.pasquet@francetv.fr

Gifts, invitations and trips:

As a reminder, France Télévisions employees are required to comply with the internal procedure regarding gifts, invitations and trips.

Consequently, France Télévisions employees may not accept gifts from the same partner where the individual or total value exceeds 150 euros over the course of a year.
They may not accept any gift in the form of cash, money, a service or a benefit in kind.
They must not accept gifts delivered to their home, whether the gift is intended for them or for a family member or someone close to them.
Similarly, they must not ask for a gift or favour for themselves, or for a family member or close friend.

Notwithstanding the rules set out above, France Télévisions employees who have been involved in a public procurement procedure may not accept any gifts.

With regard to invitations to lunch, France Télévisions employees may only accept such invitations if they are of a professional nature, are of a reasonable standard, and do not take place during a tender process or a period when decisions are being made involving the person extending the invitation.

Finally, with regard to invitations to external events, seminars, trips, holidays, etc., these must be of a professional nature.

Business partners are hereby informed that France Télévisions has rolled out a platform for its employees to declare gifts and invitations.

Commitment from business partners:

France Télévisions expects its business partners to demonstrate exemplary standards of integrity in the conduct of their business.

Business partners, for their part, undertake to comply with the rules set out above and to apply similar rules to their own employees, in particular by adopting an anti-corruption policy.

Business partners also undertake to act in accordance with applicable local, national and international legislation, in particular with regard to corruption, influence-peddling, conflicts of interest, and the fight against money laundering and the financing of terrorism.

COMPLIANCE WITH THE CODE OF CONDUCT FOR BUSINESS PARTNERS AND COMPLIANCE MONITORING

Business partners undertake to comply with the principles set out in this code of conduct and to assess and manage risks in all the areas covered by this document. They are encouraged to draw up their own binding guidelines or policies to ensure compliance with these standards.

Business partners must also ensure that their own suppliers, service providers or subcontractors comply with the principles set out in this Code of Conduct.

France Télévisions reserves the right to monitor compliance with the principles set out in this code of conduct and to carry out compliance audits amongst its business partners, particularly in the event of a report being submitted via the Group's ethical whistleblowing platform. These audits will be carried out by an external service-provider selected through a public procurement process.

The business partners undertake to

- provide any documents necessary to verify compliance with this code,
- authorise France Télévisions and its representatives to access the premises covered by the audit and to provide any information necessary for the assessment,
- maintain a sufficient level of record-keeping to demonstrate compliance with the Business Partners' Code of Conduct.

In the event of a breach, France Télévisions will send a letter of notification to the business partner concerned, setting out the list of breaches and the corrective actions to be taken within a time-frame to be specified.

A follow-up visit will ensure that the corrective measures have been effectively implemented.

Should the commitments not be fulfilled within the specified timeframe, France Télévisions reserves the right, depending on the nature and seriousness of the breach, to unilaterally terminate its relationship with the business partner, the sole fault for which shall lie with the latter, and, where applicable, to claim compensation for any loss it may have suffered as a result of such breaches.

The version of the Code of Conduct in force on the date the contract is signed applies to the business partners.

WHISTLEBLOWING PLATFORM

In order to receive all professional alerts, particularly those relating to the content of this Code of Conduct for Business Partners, France Télévisions has set up a system enabling contact with the Ethics and Compliance Officer. This system, which is open to everyone, guarantees not only the confidentiality of the identity of the whistleblower, but also the confidentiality of the identity of the individuals concerned by the whistleblowing and of the information gathered in this context. The whistleblowing system can be accessed at

https://alerte.francetelevisions.fr/

The business partners undertake to keep all their employees regularly informed about the existence of this platform.