

ETHICAL CHARTER

INTRODUCTION

A company's prosperity is largely based on the confidence it inspires, particularly in its customers and suppliers, a confidence that must be reflected both in the relationships it maintains with each of them and in its relationships with its employees and members of staff.

SATISFACTION - THE TELEVISION AGENCY (hereinafter referred to as 'the Company') pays particular attention to professional ethics in the conduct of its business. Maintaining a relationship of mutual trust with the people and partners involved in the Company's business is essential to preserve a positive individual and collective dynamic.

The existence and maintenance of this trust presupposes compliance with a certain number of rules of conduct at all levels. For this reason, the purpose of this Code of Ethics (hereinafter referred to as 'the Code') is to set out the internal rules and fundamental principles relating to ethics and professional conduct which must be respected by any natural or legal person working for the Company and/or any stakeholder having a professional relationship of any kind with the Company. It is a reference which applies to all corporate officers, directors, managers, employees, trainees and, more generally, any person carrying out an assignment, whether or not bound by an employment contract, as well as to any natural or legal person acting as a customer, supplier, partner, service provider and, more generally, any stakeholder having any kind of professional relationship with the Company (hereinafter referred to individually or collectively as 'the Employee(s)').

It goes without saying that such a Charter :

- cannot provide for everything: it therefore claims to be neither definitive nor exhaustive ;
- and that the objective pursued will only be achieved through the common sense and sense of responsibility of each individual, the Charter not excluding the importance and necessity of exercising discernment.

The Company undertakes to comply with national laws and regulations, which are an essential cardinal value. It is also the responsibility of each Employee to know and fully comply with the applicable laws and regulations as well as the Charter. Any Employee who fails to comply with them will be liable to sanctions in accordance with the legal and regulatory provisions in force, which may include the termination of his/her contract, without prejudice to any civil and/or criminal proceedings that may be brought in respect of the infringements observed.

Any 'salaried' employee who has questions about the application of the Charter is invited to contact his or her line manager or the Company's Management.

The content of the Charter may change from time to time, in particular to adapt to changes in legislation, and the Company reserves the right to amend the Charter at any time, with or without notice.

The Charter is publicly available on the Company's corporate website

I- BEHAVIOUR OF COMPANY EMPLOYEES

In all circumstances, each Employee must be inspired by the desire to act in the Company's interest, to contribute to good harmony so that the Company is a place where it is good to work together and, more generally, to show loyalty to the Company.

1.1 Compliance with laws, rules and regulations

The Company must comply with all laws, rules and regulations applicable in the countries in which it carries on and/or will carry on its business, in an honest and ethical manner.

The Company's Employees must themselves comply with these laws, rules and regulations, as well as with all the Company's internal rules and policies adopted with a view to ensuring compliance, in a spirit of responsibility, integrity and professionalism.

To this end, it is up to each individual to question the legality of his or her actions and, in the event of hesitation or questions regarding the application of any laws, rules and regulations and/or internal rules and policies, to contact his or her line manager or the Company's Management

1.1 Respect for diversity

The Company would like to point out that diversity of talent fosters, strengthens and consolidates creativity and innovation.

This is why it develops its activities in an open, inclusive, non-discriminatory, diverse and international environment where each individual is entitled to equal opportunities and fair treatment.

Employees are therefore asked to pay particular attention to differences, whether cultural, regional or individual, in the performance of their duties and to do nothing that might offend people with these differences or deprive them of the respect they are due.

Any Employee who is the victim of or witnesses a problem concerning equality, diversity and integration is encouraged to inform his/her line manager or the Company's Management immediately.

1.2 Working environment

1.3.1 General information

1.3.1.1 The Company endeavours to provide a working environment that respects human rights, as set out mainly in the Universal Declaration of Human Rights of 10 December 1948, social legislation and complies with environmental, health and safety laws and regulations. The Company does not tolerate discrimination, intimidation or harassment in the workplace. It guarantees its employees, in their interactions with third parties and among themselves, a professional environment that excludes :

- all forms of discrimination or harassment for reasons relating, in particular, to gender, disability, age, sexual orientation, political opinions, religious beliefs or trade union activity, for any purpose whatsoever (decision to hire, decision to train, promotion, retention in employment, etc.) ;
- any type of offensive physical, verbal or visual behaviour;
- any inappropriate working conditions.

Discrimination and harassment, whatever form they take, are prohibited and punishable in accordance with national legislation and regulations in force.

The Company requires its partners to treat each of their employees with respect and dignity. More generally, by maintaining business relations with the Company, each of these partners endorses the prohibition, both in its relations with the Company's salaried Employees and with its own salaried or non-salaried employees, of any

form (whether in act, gesture or writing) of intimidation, discrimination, humiliation, threat, violence, abuse, corporal punishment, physical, sexual, verbal or moral harassment.

1.3.1.2 The Company does not use forced labour or child labour, with the exception of child artists, in accordance with the provisions of Article L.7124-1 of the French Labour Code and in compliance with the rules and procedures laid down by the Direction Régionale Interdépartementale de l'Économie, de l'Emploi, du Travail et des Solidarités (D.R.I.E.E.T.S.).

The Company encourages the free expression of Employees and dialogue and respects the exercise of trade union freedoms.

1.3.1.3 Employees must always ensure that they scrupulously respect all these principles, laws and regulations, and in particular those relating to the prohibition of all moral and sexual harassment, the prohibition of all sexist behaviour and contempt, individual rights and freedoms and health and safety rules, such as the provisions of the Charter.

1.3.1 Sexual harassment

The reference legal texts defining and punishing sexual harassment are as follows:

Article 222-32 of the French Penal Code:

"Sexual exhibition in public view in a place accessible to the public is punishable by one year's imprisonment and a fine of 15,000 euros.

Even in the absence of exposure of a naked part of the body, sexual exhibition is constituted if the explicit commission of a sexual act, real or simulated, is imposed on others in a place accessible to public view.

When the acts are committed to the detriment of a minor under the age of fifteen, the penalties are increased to two years' imprisonment and a fine of €30,000".

- Article 222-33 of the Criminal Code:

" I. - Sexual harassment is the repeated imposition on a person of comments or behaviour with a sexual or sexist connotation which either violate their dignity by being degrading or humiliating, or create an intimidating, hostile or offensive situation for them.

The offence is also constituted

1° When these comments or behaviours are imposed on the same victim by several persons, in a concerted manner or at the instigation of one of them, even though each of these persons has not acted repeatedly ;

2° When these comments or behaviours are imposed on the same victim, successively, by several persons who, even in the absence of concerted action, know that these comments or behaviours constitute repetition.

II. - The use, even if not repeated, of any form of serious pressure with the real or apparent aim of obtaining an act of a sexual nature, whether this is sought for the benefit of the perpetrator or a third party, is deemed to be sexual harassment.

III. - The acts mentioned in I and II are punishable by two years' imprisonment and a fine of €30,000.

These penalties are increased to three years' imprisonment and a €45,000 fine when the acts are committed :

1° By a person who abuses the authority conferred by his or her position;

2° On a minor of fifteen years of age;

- 3° On a person whose particular vulnerability, due to his or her age, illness, infirmity, physical or mental deficiency or state of pregnancy, is apparent or known to the perpetrator;
- 4° On a person whose particular vulnerability or dependence resulting from his or her precarious economic or social situation is apparent or known to the perpetrator;
- 5° By several persons acting as perpetrator or accomplice;
- 6° Through the use of an online public communication service or by means of a digital or electronic medium;
- 7° While a minor was present and witnessed;
- 8° By an ascendant or by any other person having de jure or de facto authority over the victim".

- Article L.1153-1 of the Labour Code:

"No employee shall be subjected to acts:

1° Either sexual harassment, consisting of repeated comments or behaviour with a sexual connotation which either undermine their dignity because of their degrading or humiliating nature, or create an intimidating, hostile or offensive situation for them;

be assimilated to sexual harassment, consisting of any form of serious pressure, even if not repeated, exercised with the real or apparent aim of obtaining an act of a sexual nature, whether this is sought for the benefit of the perpetrator or a third party" (C. trav., art. L. 1153-1).

Sexual harassment is also constituted

a) When the same employee is subjected to such comments or behaviour by several persons, in a concerted manner or at the instigation of one of them, even though each of these persons has not acted repeatedly ;

b) When the same employee is subjected to such comments or behaviour, successively, by several persons who, even in the absence of concerted action, know that such comments or behaviour constitute repetition;

2° Sexual harassment is any form of serious pressure, even if not repeated, exercised with the real or apparent aim of obtaining an act of a sexual nature, whether the act is intended for the benefit of the perpetrator or a third party.

- Article L.1153-2 of the French Labour Code:

"No person who has suffered or refused to suffer acts of sexual harassment as defined in Article L. 1153-1, including, in the case mentioned in 1° of the same Article L. 1153-1, if the comments or behaviour have not been repeated, or who has, in good faith, testified to acts of sexual harassment or reported such acts may be subject to the measures mentioned in Article L. 1121-2.

The persons mentioned in the first paragraph of this article benefit from the protections provided for in I and III of Article 10-1 and in Articles 12 to 13-1 of Law 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life."

- Article L.1153-4 of the Labour Code:

'Any provision or act contrary to the provisions of Articles L. 1153-1 and L. 1153-2 is null and void'.

- Article L.1153-5 of the French Labour Code:

"The employer shall take all necessary steps to prevent, put an end to and punish acts of sexual harassment.

In the workplace as well as on the premises or at the door of the premises where recruitment takes place, the persons mentioned in article L. 1153-2 are informed by any means of the text of article 222-33 of the French Penal Code as well as of the civil and criminal legal actions available in the area of sexual harassment and the contact details of the competent authorities and services. The list of these services shall be defined by decree".

Article L.1153-6 of the French Labour Code:

'Any employee who has engaged in sexual harassment is liable to disciplinary action'.

- Article L.1154-1 of the French Labour Code:

"When a dispute arises relating to the application of Articles L. 1152-1 to L. 1152-3 and L. 1153-1 to L. 1153-4, the applicant for a job, an internship or a training period in a company or the employee presents evidence suggesting the existence of harassment.

In the light of this evidence, the onus is on the defendant to prove that the conduct does not constitute harassment and that its decision is justified by objective factors unrelated to any harassment.

The judge shall form his opinion after ordering, if necessary, any investigative measures he deems useful".

- Article L.1154-2 of the French Labour Code:

"Trade union organisations which are representative in the company may take all legal action resulting from Articles L. 1152-1 to L. 1152-3 and L. 1153-1 to L. 1153-4.

They may take such action on behalf of an employee of the undertaking under the conditions set out in article L. 1154-1, provided that they have the written agreement of the person concerned.

The person concerned may always intervene in the proceedings initiated by the trade union and terminate them at any time".

- Article L.1155-2 of the Labour Code:

"Acts of discrimination committed as a result of moral or sexual harassment as defined in Articles L. 1152-2, L. 1153-2 and L. 1153-3 of this Code are punishable by one year's imprisonment and a fine of €3,750.

The court may also order, as an additional penalty, the posting of the judgment at the expense of the convicted person under the conditions set out in article 131-35 of the French Penal Code and its publication, in full or in excerpts, in the newspapers it designates. These costs may not exceed the maximum amount of the fine incurred".

Any person witnessing or believing themselves to be the victim of sexual harassment may contact their line manager or the Company's Management, who, after assessing the situation and if the harassment is proven, will take the necessary measures to put a stop to it and impose the appropriate sanctions.

1.3.1 Sexist behaviour and contempt

The Company cannot tolerate behaviour, whether repeated or not, with a sexual or sexist connotation, which is imposed on any Employee and which violates his/her dignity. An insistent look, an inappropriate

gesture or even a sexual remark: all these types of behaviour are considered to be sexist abuse and offence and have absolutely no place within the Company. It is important to remember that such behaviour cannot be justified or excused on the pretext that it is a joke or a freedom of language that is supposedly tolerable in a given context or sector of activity.

The reference legal texts defining and punishing sexist abuse and contempt are as follows:

- Article 625-8-3 of the Criminal Code:

"Is punishable by a fine of the 5th class, except in the cases provided for in articles 222-13, 222-32, 222-33, 222-33-1-1, 222-33-2-2 and 222-33-2-3, to impose on a person any comment or behaviour with a sexual or sexist connotation which either violates their dignity because of its degrading or humiliating nature, or creates an intimidating, hostile or offensive situation for them.

Les personnes coupables de la contravention prévue au présent article encourent également les peines complémentaires suivantes :

1° La peine de stage prévue aux 1°, 4°, 5° ou 7° de l'article 131-5-1 ;

2° Un travail d'intérêt général pour une durée de vingt à cent vingt heures ».

Persons guilty of the offence provided for in this article shall also be liable to the following additional penalties:

1° The probationary sentence provided for in 1°, 4°, 5° or 7° of article 131-5-1;

2° Twenty to one hundred and twenty hours of community service__

- Article 222-33-1-1 of the Criminal Code:

"I.-A fine of €3,750 shall be imposed on anyone, except in the cases provided for in Articles 222-13, 222-32, 222-33, 222-33-2-2 and 222-33-2-3, forcing on a person any comments or behaviour with a sexual or sexist connotation that either violates their dignity because of its degrading or humiliating nature, or creates an intimidating, hostile or offensive situation for them, when this is committed:

1° By a person who abuses the authority conferred by his or her position;

2° On a minor;

3° On a person whose particular vulnerability due to age, illness, infirmity, physical or mental disability or pregnancy is apparent or known to the perpetrator;

4° On a person whose particular vulnerability or dependence resulting from his or her precarious economic or social situation is apparent or known to the perpetrator;

5° By several persons acting as perpetrator or accomplice;

6° In a vehicle used for public passenger transport or private public transport or in a place intended for access to a means of public passenger transport;

7° Because of the victim's actual or assumed sexual orientation or gender identity;

8° By a person already convicted of the offence of sexist and sexual insult who commits the same offence as a repeat offender under the conditions set out in the second paragraph of Article 132-11.

II - For the offence referred to in I of this article, even in the event of a repeat offence, the public prosecution may be extinguished, under the conditions set out in articles 495-17 to 495-25 of the Code

of Criminal Procedure, by the payment of a fixed fine of 300 euros. The amount of the reduced fixed fine is 250 euros and the amount of the increased fixed fine is 600 euros".

Anyone who witnesses or believes they have been the victim of sexist abuse or insult may contact their line manager or the Company's management, who, after assessing the situation and if the abuse or insult is proven, will take the necessary measures to put a stop to it and impose the appropriate penalties.

- **1.3.1 Harassment**

- The Company undertakes to ensure that its working environment is free from any form of psychological harassment, in particular any intimidation, threat or act of violence.
- The reference legal texts defining and punishing moral harassment are as follows:
 - Article 222-33-2 of the Criminal Code:
 - 'The act of harassing another person by repeated comments or behaviour with the purpose or effect of causing a deterioration in working conditions likely to infringe their rights and dignity, to alter their physical or mental health or to compromise their professional future, is punishable by two years' imprisonment and a fine of €30,000'.
 - Article L.1152-1 of the Labour Code:
 - 'No employee shall be subjected to repeated acts of moral harassment, the purpose or effect of which is to worsen his or her working conditions in such a way as to infringe his or her rights and dignity, to alter his or her physical or mental health or to compromise his or her professional future'.
 - Article L.1152-2 of the French Labour Code:
 - "No person who has suffered or refused to suffer repeated acts of psychological harassment or who has, in good faith, reported or witnessed such acts may be subject to the measures mentioned in Article L. 1121-2.
- The persons mentioned in the first paragraph of this article benefit from the protection provided for in I and III of Article 10-1 and in Articles 12 to 13-1 of Law 2016-1691 of 9 December

- Article L.1152-5 of the French Labour Code:

'Any employee who has engaged in moral harassment is liable to disciplinary action'.

- Article L.1152-6 of the Labour Code:

"A mediation procedure may be initiated by any person in the company who considers himself to be a victim of psychological harassment or by the person accused of the harassment.

The choice of mediator is agreed between the parties.

The mediator is informed of the state of relations between the parties. He will attempt to reconcile them and submit proposals to them, which he will record in writing, with a view to putting an end to the harassment.

If conciliation fails, the mediator will inform the parties of any sanctions that may be incurred and of the procedural guarantees provided for the victim.

Any person witnessing or believing him/herself to be a victim of psychological harassment may contact his/her line manager or the Company's Management, which, after assessing the situation and if the harassment is proven, will take the necessary measures to put an end to it and impose the appropriate sanctions.

1.3.1 Procedure to be followed - receiving reports

The Company encourages its Employees to express their points of view, to defend their opinions and to report unacceptable behaviour or requests that are contrary to national laws and regulations and to the Charter. The normal channel for raising such concerns is through direct or indirect management.

Any employee who is aware of, or considers himself to be the victim of, any of the acts referred to in articles 1.3.1 to 1.3.4 of the Charter is therefore asked to inform his line manager or the Company's Management. This procedure is also open to external or occasional employees of the Company.

In all cases, any report must be made in good faith and properly documented by providing the facts, information or documents, in whatever form or on whatever medium, that support such a report. Whistleblowers, if acting in good faith, will not be subject to any reprisals and their identity will be kept secret within the limits authorised by law.

The Company's Management will inform the Employee who is the victim or witness of the report that it has received the report, of the expected time required to examine it and of the procedures for informing the Employee of the outcome of the report. As soon as the report is received, and without waiting for the conclusions of the investigation, the Company will take steps to ensure that the situation ceases and does not degenerate.

The principles of confidentiality and presumption of innocence are respected during the verification and interviewing of the protagonists. Strict confidentiality is guaranteed with regard to the identity of the Employee (victim or witness) who made the report, the facts, the victim if different from the Employee who made the report, and the persons targeted by the report.

All investigations conducted by the Company's management comply with the applicable laws and regulations.

During this investigation, everyone is required to cooperate fully and completely and to provide all information and documents on request.

Any person implicated is informed of the nature of the allegations concerning him or her, but is not informed of the identity of the Employee who made the report. Information may not be provided immediately if it proves necessary, for example, to verify the facts, preserve evidence or refer the matter to the competent authorities, particularly in the case of a report of psychological or sexual harassment.

Any information communicated is shared only with those persons who need to know it in order to ensure that the report is dealt with and/or that appropriate action is taken. These persons are bound by a strict obligation of confidentiality.

After the various parties have been interviewed, the Company may draw up an investigation report including, in addition to a reminder of the background to the report, the decisions taken and the steps taken by the Company, a summary of the information gathered and the facts that led to the conclusion.

Subsequently, the Employee who made the report, the victim (if different from the Employee who made the report) and the persons concerned by the report are informed in writing of the conclusion of the verification operations, whether or not the report is admissible and the action that the Company intends to take.

In any event, it is imperative that the aforementioned procedure be used and implemented in good faith for the sole purpose for which it is intended. Any non-compliant use, in addition to possible disciplinary sanctions, may give rise to civil and/or criminal penalties.

1.1. Protecting the environment

Because the audiovisual industry conveys messages and shapes collective representations, everyone has a particular responsibility to raise environmental awareness.

Aware of its responsibilities towards present and future generations, and of the carbon impact of the audiovisual sector, the Company's policy is to constantly seek to minimise the environmental impact of its activities by getting involved in environmental practices for more eco-responsible and environmentally-friendly audiovisual productions.

To carry out this policy, the Company endeavours to assess the effects of its activities on the environment and to put in place, where necessary, eco-responsible programmes and solutions aimed at reducing them, including, as far as possible, beyond legal requirements. It is also attentive to the expectations of its employees and, more broadly, of all stakeholders in the audiovisual sector.

Each employee is therefore asked to participate in this effort by scrupulously respecting all the Company's programmes relating to environmental protection (reducing water consumption, sorting and managing waste, car-sharing, travelling by train rather than by plane, reducing energy consumption in the workplace and particularly electricity consumption, avoiding single-use plastics, etc.) and to adopt behaviour in the performance of their duties that takes account of the impact on the environment and aims to reduce their carbon footprint and that of the Company.

To help employees reduce their carbon footprint and encourage them in this more ecological approach, the Company invites them to consult the dedicated website <https://www.ecoprod.com/fr/>.

1.1 Reliability and accuracy of information - keeping records and documents

The imperatives of good management require the utmost rigour in the information provided and in the management of that information.

To this end, everyone must endeavour to provide and transmit data and documents that are reliable, sincere and as accurate as possible.

Similarly, the imperatives of communications and declarations intended for all supervisory bodies or any other form of communication to the public made on behalf of the Company or resulting in the transmission of information in this context, require the Employees concerned to ensure, each at their own level, that the information used in this context is complete, fair, accurate, adequate, comprehensible and compliant with the controls and procedures applicable in this area.

All documents and files, records and declarations of information must be complete, accurate and up to date, must fairly reflect reality and, more generally, must comply with the laws, regulations, Charter and internal policies in force within the Company.

The wilful or knowing falsification of a document, such as the disclosure or transmission of any misleading information, which includes not only inaccurate information but also the presentation of information with the aim of misleading or incorrectly informing those to whom it is addressed, or the recording of false, misleading or artificial entries or information that the Employee knows to be inaccurate or irregular in the Company's books and records, is strictly prohibited and may give rise, in addition to any disciplinary sanctions, to civil and/or criminal penalties.

This includes not only dealing with inaccurate information but also adopting a certain organisation of information with the intention of misleading or incorrectly informing those to whom it is addressed.

All documents and files, records and declarations of information, books and other accounting records, without this list being exhaustive, must be kept in compliance with the applicable limitation and retention periods, in particular to allow any internal or external audits to be carried out.

Personne n'est, en conséquence, autorisé à détruire, altérer, falsifier ou dissimuler des documents, dossiers ou registres, à plus forte raison dans le but d'entraver, d'empêcher ou d'exercer une influence sur le cours d'une procédure judiciaire ou une enquête en cours ou raisonnablement prévisible, ou dans le but de rendre les documents, registres inutilisables dans le cadre de telle procédure ou enquête.

Any question relating to the obligation to keep records in the context of a current or foreseeable dispute or investigation must be submitted to the hierarchical superior or to the Company's Management.

These rules apply not only to Company employees who are members of the finance and accounting staff and to all 'salaried' Company employees in the performance of their respective duties, but also to all employees, whoever they may be, in the performance of their duties.

Any Employee who violates these provisions may be subject to disciplinary action, without prejudice to any criminal and/or civil penalties.

1.1 Personal information

The Company respects the privacy of individuals and has put in place internal rules indicating how personal information should be handled.

It is imperative that everyone complies with all laws, regulations and treaties relating to privacy and data protection as well as the Company's internal policies and rules concerning the collection, storage, use, disclosure, destruction or any other processing of personal information.

Employees responsible for processing personal information must comply with the laws and regulations applicable in this area, and in particular EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016, Law no. 78-17 of 6 January 1978, as amended by Law 2004-801 of 6 August 2004, Laws 2006-64 of 23 January 2006, 2007-1787 of 20 December 2007, 2008-686 of 15 July 2008 and Law 2018-493 of 20 June 2018 relating to information technology, files and freedoms in force on the date hereof.

Each Employee who has access to personal data must take all precautions to ensure that such data is protected and secure.

Any acquisition, use or disclosure of personal information in violation of applicable legislation is prohibited.

Any theft or concealment of documents or property belonging to the Company must be reported. These acts are criminal offences.

Furthermore, if, in the course of their duties, Employees have access to personal information, they must only use this information for professional and authorised purposes, with the exception of requirements linked to the exercise of the right of expression or to trade union or staff representation functions. No communication of this personal information to an unauthorised person, including another Company Employee, is authorised.

If Employees have any questions about how personal information should be handled or about exercising their rights (access, rectification, deletion and portability of their data, limiting and objecting to processing, defining directives concerning the fate of data after their death), they should write to the following e-mail address rgpd@arthur-world.com and/or contact their line manager or Company management. They are also informed that they may lodge a complaint with the Commission Nationale de l'Informatique et des Libertés, in particular, in the event of difficulties in exercising their rights.

1.1 Personal conflicts of interest

The Company expects its Employees, each at his or her own level, to demonstrate the utmost integrity and loyalty so as to act in good faith, in the Company's interests and thus avoid finding themselves in a situation likely to give rise to a conflict with the Company's interests or to tarnish the Company's reputation.

A conflict of interest may arise or arise from various circumstances, in particular when the personal interests of an Employee or those of natural persons or legal entities to which he or she is linked conflict or are likely to conflict with the Company's interests and, more generally, interfere with those interests.

Thus, a conflict of interest gives rise to the risk that the Employees concerned will no longer work loyally for the Company but with the aim of obtaining or retaining a personal benefit for themselves or any other natural or legal person with whom they have personal interests (friendly, professional, commercial or financial).

In particular, situations in which an Employee, especially one in a position to commit the Company, is offered a directorship, shareholdings in commercial organisations, entities, companies or associations or to act, even on a voluntary basis, for entities outside the Company, and more generally whenever an Employee is interested in a transaction or project likely to have an influence on or interfere with his/her loyalty and the reliability of his/her judgement in relation to the Company, are likely to give rise to a conflict of interest and therefore a risk.

Consequently, any decision must be taken and any activity carried out in the exclusive interest of the Company in a transparent and sincere manner and in good faith.

It is also essential that Employees with the title of 'Manager' or 'Director' exercise discernment and take particular care when structuring new organisations to avoid any conflicts of interest between these structures. Where there is a risk of a conflict of interest, the Employee concerned must, spontaneously and in a spirit of loyalty and transparency, immediately inform his/her line manager and/or the Company's Management in writing and refrain from taking part in the decision concerned or initiating or maintaining any relationship with the third party concerned until a decision has been taken by his/her line manager or the Company's Management.

In any event, he must not use his position or mission within the Company for personal gain, whether direct or indirect.

1.1. Use of IT resources and means of communication

The various means of communication provided by the Company (telephone, computers, email, internet, office equipment, etc.) may only be used in a professional context and for the sole purpose of carrying out the tasks entrusted to Employees. In particular, information technology, i.e. hardware, software, networks and the information contained therein, is a key factor in the Company's success and must be used responsibly and solely for legitimate purposes.

All data stored on the Company's IT resources for the purposes of Employees' work is the property of the Company and is presumed to be of a professional nature. Consequently, the Company may access any data stored on these resources that is not identified as personal.

The use of social networks (all services enabling interaction, conversation and exchange online) must be in a personal context and any expression of personal opinions referring to the Company, its Employees, its customers, its partners or its managers must comply with the provisions of the Charter.

Furthermore, it is forbidden to :

- illegally download files, videos, images, music, software, etc., outside legal distribution channels;
- consult sites whose content is likely to offend the dignity of others, public decency or public order;
- use the Company's computer systems to consult, save or send Internet pages or messages with illegal or defamatory content;
- use the Internet and social networks for any illegal activity.

Personal use of the Company's IT resources, such as sending e-mails to third parties, must be kept to a strict minimum and must never involve the installation of hardware or software that does not comply with IT standards.

The Company's resources must be used solely to achieve professional objectives and under no circumstances for personal purposes. Employees are therefore asked to :

- to act as a 'good father of the family' and to take care of the Company's resources as if they were their own;
- take the necessary measures to protect the Company's resources placed under their responsibility against loss, theft, vandalism or unauthorised disclosure;
- not to access the Company's resources, nor to use them or attempt to use them to access, store, distribute or publish inappropriate content (i.e. pornographic, obscene, racist, anti-Semitic, sexist, discriminatory, threatening, offensive, etc.).

Furthermore, in order to ensure optimum protection of data belonging to the Company, all Employees are asked not to store such data, including that which they generate in the performance of their duties, anywhere other than on the Company's IT resources. If by any chance this is not the case, at the end of their assignments, the Employees concerned undertake :

to deliver the said data to the Company without delay on any medium to be indicated by the latter;

- then, to destroy any copies that they may keep on any other third-party IT resources and to provide the certificate attesting to such destruction;
- and in any event, never to use this data for any purpose or on any medium whatsoever, unless they incur civil and/or criminal penalties.

I- THE COMPANY'S EXTERNAL RELATIONS

2.1. Gifts and invitations

The exchange of gifts or invitations may contribute to mutual understanding and improve business relations, but may also generate conflicts between personal interests and professional obligations. Consequently, Company Employees must exercise extreme caution before offering or accepting any gift, favour or invitation intended for or from any natural or legal person having or seeking to have business relations with the Company.

Accordingly, 'salaried' Company Employees must neither request nor accept, as part of the performance of their employment contract, any payment, remuneration, commission, invitation, benefit or gift of any kind or size whatsoever, for themselves or for their entourage, from customers, suppliers, partners, prospective customers or, more generally, from any person having links, business relations or interests with the Company, or seeking to have such links, relations or interests, or seeking to obtain confidential information. In particular, they must not accept any payment, gift, favour or invitation intended to influence or which could appear to influence the Company's commercial decisions.

However, the Company exceptionally allows its 'salaried' employees to receive a gift if it meets all of the following criteria:

- it is part of normal commercial practice and without any expectation of consideration ;
- it is offered outside any period of negotiation, invitation to tender or competition;
- it has a very low value and, in any event, a value that is lower than the value set by the Company at the time in question and cannot be considered as a bribe or a gratuity;
- it is not in the form of cash or its equivalent (shares, securities or other negotiable instruments, gift vouchers, etc.);
- it does not contravene any law, regulation, Company policy or corporate policy of the third party donor or recipient;
- it is of an appropriate nature
- it is occasional;
- it is such that its public disclosure would not harm the Company or the Employee who received the gift, put them in a bad position or suggest that it would be likely to distort the recipient's judgement;
- it is the subject of a detailed written declaration to the hierarchical superior or to the Company's Management as soon as it is received.

The acceptance of any gift that does not comply with these criteria is subject to the prior written authorisation of the line manager or Company management. Furthermore, the line manager or the Company's Management

may consider that a gift received does not meet the above-mentioned criteria. In this case, it may be ordered that the gift be returned or reimbursed by the Employee to whom it was given.

Without prejudice to any disciplinary action that may be taken, any gift received that does not meet the above criteria must be returned without delay to the person who gave it. If it is clear that the return of the gift may prove embarrassing or insulting to the person who gave it, the Employee who received the gift should immediately inform his/her line manager or the Company's Management, who will decide on the course of action to be taken.

Similarly, Company Employees may accept or pay for business meals of a reasonable amount or exchange reciprocal invitations of equivalent value between Company Employees and private sector partners with whom the Company has or plans to have business relations, provided that this is :

- occasional ;
- does not involve excessive expenditure; and
- takes place within a framework appropriate to the business and ;
- takes place in compliance with the procedures applicable within the Company at the time in question, in particular with regard to the maximum amounts authorised by the Company for such invitations.

All 'salaried' Company Employees are prohibited from accepting, for themselves or any other person with whom they have a personal relationship of any kind whatsoever, an offer for the use or loan free of charge of vehicles, goods, property or free or reduced-cost travel from any third party who has or wishes to have a business relationship with the Company or who is in direct competition with it.

If an Employee considers that there is a legitimate business reason for accepting such offers in a specific case, he or she must first refer the matter to his or her line manager or to the Company's Management in order to obtain prior written approval.

The Company's 'salaried' Employees are required to record in writing and report to their line manager or to the Company's Management any gift, invitation or favour (or series of gifts, invitations or favours) intended for and/or originating from a person or company with whom the Company has or intends to have business relations or with whom it is in direct competition, and whose value (or cumulative value over the course of a year) is greater than the value set by the Company at the time in question. An immediate unsolicited report should be made. This report must specify the nature of the gift, invitation or favour, its value, the name of the person who gave or received the gift and the nature of the relationship between the third party and the Company.

Gifts and invitations offered to a public official, as these two terms are defined in Article 2.2 below, are only authorised in exceptional circumstances.

2.1. Compliance with rules to combat corruption and influence peddling

The Company must comply with and ensure compliance with all anti-corruption and anti-influence peddling regulations in force in each country in which it has carried out, carries out or will carry out its activities, the violation of which may result in civil and/or criminal penalties.

Each employee must therefore comply with these laws and regulations, as well as with the Company's internal rules and policies on combating corruption and influence peddling, in a spirit of responsibility, honesty, integrity and professionalism. To this end, it is the responsibility of all employees to be aware of and understand the legal framework and the internal policies and requirements applicable to their duties.

It should be noted that acts of corruption and influence peddling are strictly prohibited within the Company and, moreover, are punishable under the Criminal Code, in addition to any disciplinary sanctions that may be applied.

It is therefore strictly forbidden to make, promise to make or authorise to make any payment of any kind whatsoever and in any form whatsoever to public officials and, more generally, to any person holding public office, entrusted with a public service mission or invested with a public elective mandate, as well as to any member of their family (hereinafter collectively referred to as 'Public Official(s)'), gratification, invitation,

advantage or gift, direct or indirect, direct or indirect payment of expenses in any capacity whatsoever, with the real or apparent aim of exerting undue influence on them, in order to obtain or retain a contract, a customer or another undue economic advantage and, more generally, to obtain from them advantageous actions or commitments.

Similarly, no contribution of a political nature nor any donation to a charitable cause may be made for the benefit or at the request, whether direct or indirect, of a Public Official in order to obtain or retain a contract, a customer or any other undue economic advantage and, more generally, to obtain advantageous actions or commitments from them.

The term 'Public Official' means in particular:

- (i) any official, officer, employee, civil servant, appointee or official representative of a public authority (or of a department, independent administrative authority or entity, body or unit of a public authority, including the legislative, executive and judicial branches) or of a public international organisation ;
- (ii) any political party, official, member or representative of a political party;
- (iii) candidates for political or judicial office;
- (iv) any representative of a local public authority (including regional and departmental public authorities);
- (v) any member of the family of any of the above.

Similarly, any payment of any kind whatsoever and in any form whatsoever, direct or indirect gratuity, invitation, benefit or gift, or direct or indirect payment of expenses in any capacity whatsoever, to a third party is strictly prohibited when the Employee concerned knows or has reason to believe that the third party will transfer all or part of the payment to a Public Official, gratification, invitation, advantage, gift or the assumption of expenses, with the aim of exerting undue influence on this Public Official in order to obtain or retain a contract, a customer or an undue economic advantage and, more generally, to obtain advantageous actions or commitments from him.

It is also forbidden to make, directly or indirectly, cash payments to a Public Official. Cash payments' include cash and cash equivalents in any currency (including cryptocurrencies), such as cashier's cheques, travellers' cheques, money orders, bank drafts, promissory notes, telephone cards, gift cards, stored-value cards, vouchers, direct cash deposits to a bank account, as well as company cheques made out to "cash" or 'bearer".

However, the Company tolerates, on an exceptional basis, payments, expenses, gratuities, invitations, advantages or gifts to Public Officials, on the condition and subject to these being, cumulatively and in compliance with the terms and conditions set by the Company:

- authorised by local law in the country concerned ;
- duly and accurately recorded in writing; and
- and approved in advance in writing by the Employee's line manager or the Company's Management.

Consequently, before making any payment, gratuity, invitation, advantage or gift, whether direct or indirect, or directly or indirectly covering expenses in any capacity whatsoever, to a Public Official, or before using a third party to deal with a Public Official on behalf of the Company, the policies and procedures in force within the Company must be strictly complied with.

In the event of uncertainty in relations with a Public Official, all Employees should consult their line manager or the Company's Management without delay.

2.1. Compliance with competition rules

The Company must comply with and ensure compliance with all the competition rules in force in France and in each country in which it has carried on, carries on or will carry on business, any breach of which may result in civil and/or criminal penalties.

Aucune action de la Société ne doit empêcher, restreindre ou fausser la concurrence. Dès lors, chaque Collaborateur s'oblige à ne pas participer à une quelconque opération enfreignant la liberté du commerce, les règles d'une concurrence loyale et doit en conséquence se rapprocher de sa hiérarchie et/ou de la Direction de la Société pour déterminer si certains aspects de son travail sont susceptibles de violer ces principes ou une disposition légale.

In the event of any uncertainty regarding the possible legal implications of a transaction or contract, the Employee should consult his/her line manager or the Company's Management without delay.

Any communication with the Company's competitors relating to prices, marketing strategies, market shares, sales policies or sales territories is strictly prohibited.

If an Employee is contacted by a third party who is a competitor of the Company on any matter relating to an area that is sensitive from a competition point of view, the Employee should immediately put the third party in contact with his or her line manager or the Company's Management, who will decide how to deal with the contact.

2.1. Fairness and loyalty towards suppliers

All Employees must treat the Company's suppliers fairly and loyally. The Company expects them to treat it in the same fair and ethical manner.

When Company Employees choose or recommend suppliers of products or services, they should do so on the basis of the performance of these suppliers and according to objective criteria, such as price, quality, delivery terms and suitability for the Company's needs.

Purchasing decisions, and in particular the choice of suppliers, are made by Employees taking into account exclusively the commercial interests of the Company and its customers, with no favouritism or discrimination in the decision-making process.

This duty of fairness applies not only to Company employees responsible for purchasing, but also to other employees who influence the purchasing process in any way.

The Company requires its suppliers and subcontractors to undertake to comply not only with the Charter but also with its policies on compliance with the laws and regulations in force (including laws on sexual and gender-based violence and harassment as well as moral harassment, anti-corruption laws and legislation on competition law), respect for human rights, protection of the environment and safety, protection of confidential information and Intellectual Property and, more generally, business ethics.

2.1. Intellectual Property

The term 'Intellectual Property' refers in particular to patents, designs and models, trademarks and copyrights, and may include protected information.

The Company's business is based primarily on the development and exploitation of Intellectual Property rights. Safeguarding the Company's manufacturing secrets and Intellectual Property is essential. The Company therefore takes all necessary measures to protect its Intellectual Property rights and to combat acts of counterfeiting, including the piracy of its audiovisual programmes.

To this end, it is the responsibility of each Employee to be aware of these measures and to apply them, which means in particular informing his or her superiors and/or the Company's Management of any acts of counterfeiting of which he or she may be aware.

Reciprocally, the Company is committed to respecting the Intellectual Property rights of third parties and all laws relating to protected works, including in particular musical works, films, software, trademarks and all other literary and artistic works.

To this end, each Employee must ensure :

- to respect the Intellectual Property rights of the Company or third parties and not to represent or reproduce them without having first obtained the authorisation of their owner ;
- make appropriate use of any Intellectual Property belonging to the Company or to third parties.

2.1 Confidential and protected information

Employees may have access, in the course of or in connection with the performance of their duties, to confidential and protected information concerning the Company and its employees, customers, suppliers, commercial partners and other service providers.

Confidential and protected information includes information that has not yet been made public, information that gives a company an advantage over its competitors, or information that could harm a company if disclosed prematurely or inappropriately.

Thus, inventions, creations, know-how, manufacturing secrets, financial information, corporate strategies, marketing programmes, undisclosed information relating to film or television projects or productions, as well as any information relating to the Company's relations with employees, authors, artists, customers, suppliers and commercial partners, in particular, constitute confidential and protected information.

Consequently, Employees must take the necessary measures to :

- protect and guarantee the confidentiality of information to which they have access as a result of their professional activity, including within the Company, vis-à-vis unauthorised persons ;
- limit the disclosure of confidential information to persons with a legitimate need to know;
- respect the obligation not to divulge outside the Company, by any means and for any purpose whatsoever, any confidential information, unless expressly delegated or authorised to do so by the hierarchical superior or the Company's Management;
- to keep securely, in paper or electronic form, all confidential information relating to the activities of the Company or of third parties with whom they have a professional relationship;
- ensure that they comply with any confidentiality undertakings that they or the Company may have given in this respect and, in particular, inform their superiors and/or the Company's management of any difficulties so that the necessary measures can be taken and so that they and the Company cannot be held liable in this respect.

2.1. Relations with the media, the authorities and public statements

All communications with people outside the Company must be accurate, honest and comply with legal and regulatory requirements.

In order to provide these contacts with clear, accurate and honest information that complies with regulatory and legal requirements, it is essential that communications about the Company, including those to the media, only come from spokespersons duly authorised by the Company.

Company Employees who are not authorised spokespersons may not initiate contact or communicate with third parties, such as journalists, the media, authorities of any kind or financial analysts, in the name of and on behalf of the Company and may not act in the name of and on behalf of the Company or deal in the name of and on behalf of the Company with matters relating to the Company.

Any Employee who is contacted by the media, a public authority or a financial analyst to talk about the Company or a subject related to the Company must immediately inform his/her line manager or the Company's Management, who will decide what action to take. In all cases, only Employees specifically authorised by the Company's Management are entitled to delegate this authorisation to speak to third parties about the Company or a subject related to the Company.

It is strictly forbidden for Employees to create pages or accounts in the name of the Company on the Internet or on social networks or to use the Company's logos without having been expressly authorised to do so by the Company's Management.

2.8. Advertising

Employees must ensure that advertisements for the Company's audiovisual productions, in particular television content and programmes, are not misleading or defamatory and, more generally, strictly comply with the laws and regulations in force in this area.

Similarly, Employees must ensure in particular that critical assessments are documented, faithful and accurately reflect the author's point of view and that the sources are fully identified, referenced and respected.

2.9. Political activities

Although the Company does not support any political party, it respects the right of each individual to participate in political life.

An Employee's involvement in political responsibilities is strictly personal; such activities may only be carried out outside the workplace and working hours.

Employees must neither represent a political party on behalf of the Company nor use the Company's resources or image to support a candidate or a political party.

2.10. Artificial intelligence

Company Employees are asked to systematically inform the Company in advance of any use of artificial intelligence, and in particular generative artificial intelligence, envisaged in the context of the assignments entrusted to them by the Company.

In any event, they undertake :

- to comply with the laws and regulations in force applicable to artificial intelligence ;
- to adopt a responsible attitude when supplying artificial intelligence to the Company or when using it in the performance of their duties;
- never to use the Company's data, resources or other assets to train their artificial intelligence systems or models for any purpose whatsoever, unless they obtain the prior written consent of their line manager or the Company's Management.

I- COMMUNICATION OF THE CHARTER

The Charter is signed and accepted by each of the Company's Employees. It is brought to the attention of all current and future employees, to whom it is immediately enforceable.