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## Code of Ethics and Professional Conduct



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### Foreword by the Executive Board

Since its creation, M6 Group (hereafter the “Group” or “M6 Group”) has been committed to asserting its values of entrepreneurial spirit, innovation and strong adaptability. To do this, it specifically relies on employees with a heightened sense of teamwork. These values are fundamental to our Group.

We are also aware that the dual corporate objectives of financial success and corporate responsibility are inextricably linked. Adopting an ethical and responsible conduct towards our employees, our business partners, society and the environment all form an integral part of our Company’s value system.

Beyond compliance with the law and contractual commitments, the Code of Ethics and Professional Conduct is a set of professional guidelines that apply to all staff regardless of status (employees on fixed-term and permanent contracts, freelance journalists, event-contract workers, trainees) or position, including those at the highest level. Temporary workers and external providers must also comply with the Code of Ethics and Professional Conduct.

Every Group employee must always strive to serve the general public and customers, as well as all partners and stakeholders, with integrity, professionalism, conscientiousness, impartiality and discretion.

The following provisions form an integral part of the rules of conduct at M6 Group companies, and all employees are required to comply with them. Individuals must thus be guided by principles of professionalism and trustworthiness at all times, not only towards their company and M6 Group, but also towards the public, customers and suppliers, in compliance with both the laws and regulations in force and our standards of ethics and professional conduct.

In order to guarantee that our Group remains exemplary in terms of ethics and professional conduct, and also to facilitate the day-to-day lives of each and every one of you, we encourage you to read and adhere to the provisions detailed in this Code of Ethics and Professional Conduct and which are outlined hereafter.

This Code has been updated to comply both with Law n°2016-1691 of 9 December 2016 relating to transparency, anti-corruption and modernisation of the economy, known as the “Sapin II” Law and Decree n°2017-564 of 19 April 2017.

The Executive Board



## Chapter I. General principles

### 1. Compliance with laws and regulations

The M6 channel was licensed to broadcast from 1 March 1987 under the licensing regime set forth by Article 30 of the amended Law of 30 September 1986 on Freedom of Communication.

Since it operates in the audiovisual sector, M6 Group is governed by legislation and decrees specific to its activity as well as by the agreement it signed with the Conseil Supérieur de l'Audiovisuel. As a result, employees of Group companies are required to adhere strictly to all laws and regulations relating to commercial companies in general, and to companies in the audiovisual and film sectors in particular. Under no circumstances should employees disregard these legal statutes nor should they interpret them in a way that will damage companies controlled by the Group. If there is any doubt regarding the legality of a decision, the assistance and expertise of the Legal Department should be sought.

### 2. Trust and mutual respect

We nurture relationships based on mutual respect and trust, and ensure that we create a working environment that leaves no room for discrimination.

As such, every person has the right to receive fair, dignified and respectful treatment. We are committed to ensuring equal opportunities and we encourage respect and diversity in the workplace, where every individual is valued and treated with courtesy, fairness and dignity. Harassment, discrimination, sexism, threatening behaviour and intimidation are prohibited.

### 3. Loyalty towards Group companies

Employees must always exercise loyalty, in line with the interests of the Group:

- They must under no circumstances use their position for personal ends, whether by exploiting confidential or inside information or by profiting in any other way from their professional position to benefit from the exercise of their private affairs.
- They must not use, either directly or indirectly, the names, brands or titles of Group Companies or programmes for the exploitation of their image or for advertising purposes.
- They must not commit any act of disparagement.

### 4. Conflicts of interest

In the normal course of our business activities, we may be faced with situations in which a decision, supposed to be the best for the Company, conflicts with our personal interests.

In the event of a conflict of interests, an employee may have trouble making impartial decisions that are in the best interests of the business. That is why employees must take scrupulous care to avoid any personal conflict of interests, both in relation to the Group and to its customers and suppliers. They must serve the Group's interests under all circumstances, even if their conduct has an unfavourable impact on their own interests. Employees faced with a real or potential conflict of interests must disclose it to their superior or manager for prompt resolution.



### 5. Protection of the Company's assets and fraud prevention

The Company's assets must be used by employees exclusively for the business purposes for which they are intended and not for improper personal use or used for illegal or other illicit purposes. Every employee is specifically asked to read the "Company Mobile Device User Guidelines" (see Appendix 1) which can be accessed on the Group's social and collaborative network.

### 6. Freedom of expression

We encourage our employees to express themselves freely in compliance with legal and regulatory provisions, without fear of reprisal.

Except in the event of misuse, the employee benefits from freedom of expression both inside and outside the Company, the restriction of which may only be justified on the grounds of the nature of the task to be completed and proportionate to the aim sought.

The opportunity afforded to each individual to express themselves freely means that reprehensible conduct can be prevented, detected and corrected. As a result, we seek to guarantee our employees an open working environment, in which staff can contact their superiors or senior executives in complete confidence to inform them of a problem or to express a concern. It is the responsibility of the senior executives to promote a completely open dialogue, to support employees and to treat problems raised in a fair and impartial manner.

### 7. Compliance with the Code of Ethics and Professional Conduct

This Code of Ethics and Professional Conduct is appended to the internal rules of M6 Group companies. It is accessible on the Company's social and collaborative network. All employees are required to comply with and apply these rules. Métropole Télévision deems any breach of this Code to be a disciplinary offence.



## Chapter II. Our commitments as a business

### 1. Safety and quality of our products

We create and develop safe products and services for our customers.

We consider ourselves to be partners to our customers. Our business success is based on a lasting relationship with our customers. Consequently, we are committed to providing them with products and services that are safe and of excellent quality.

They must not contain faults or features that may be harmful to human health or property.

### 2. Information relating to products and services

In general terms, employees must demonstrate honesty in relation to marketing and advertising in the promotion of the products and services marketed by the Group.

### 3. Relations with our commercial partners

Our commercial partners need to find in M6 Group a reliable and law-abiding partner. This requirement specifically involves being aware of the contractual obligations that bind us to our commercial partners. In return, we make sure that the practices of our commercial partners are founded in compliance with legislation.

M6 Group only uses external providers (consultants or intermediaries, business finders, etc.) who are able to provide a valuable service that is based on specific professional expertise. This service must be provided within a clear and specific framework, must correspond to a contract and the use of an external provider to carry out an illegal procedure is clearly prohibited. External providers must not be able to incur the Group's liability. Furthermore, there must be consistency in the remuneration with the services rendered.

### 4. Compliance with competition rules

Employees ensure their compliance with applicable anti-trust legislation and competition rules. They may refer to the Charter relating to compliance with competition rules (see Appendix 2) accessible on the Group's social and collaborative network or consult the Legal Department in relation to any anti-trust or competition issue.

### 5. Government and regulatory bodies

Within the framework of our commercial relationships with government bodies, which are subject to particularly strict requirements, and to our relationships with regulatory bodies, Group employees are required to act in compliance with applicable legislation.

In addition, in the event of an official request issued by a government or regulatory body, employees are recommended to immediately contact the Group's Legal Department before taking any action, in order to comply with all legislative provisions.



### 6. Independence and responsibility towards the media

Complete editorial and journalistic independence must be observed in the gathering and broadcast of information. Editorial and journalistic independence is the cornerstone of our new publishing, reporting and broadcasting activities and we are mindful of our responsibility to the public in our role as opinion formers and we act accordingly.

The Group complies with all laws, regulations and business principles relating to the separation of editorial content from commercial advertising. Lastly, editorial staff are required to respect privacy and to handle information, opinions and images responsibly.

In accordance with the Bloche law of 14 November 2016 aiming to improve the freedom, independence and pluralism of the media, every journalist has the right to refuse to be pressured, to refuse to divulge their sources and to refuse to put their name to an article, programme or part of a programme, or a contribution whose form or content has been amended without their knowledge or against their will.

They cannot be forced to agree to an act inconsistent with their professional belief shaped in compliance with M6 Group's Journalists' Code of Conduct.

Any agreement or employment contract signed between a professional journalist and M6 Group entails adherence to this Code of Conduct.

### 7. Respect for intellectual property

As a media company, Group employees are fully aware of the particular importance of respecting intellectual property in our business activities. Intellectual property specifically protects the rights of authors and holders of related rights on all types of copyrighted works, regardless of their type, form of expression, merit or destination. This includes, but is not limited to, literary and musical works, films, TV programmes, visual works and software.

Intellectual property also protects holders of industrial property rights (notably, but not limited to, trademarks and patents).

Infringement of an intellectual property right includes, but is not limited to, the unauthorised broadcast, distribution or representation of a protected work, trademark or patent, as well as the creation and distribution of unauthorised copies of protected intellectual property.

### 8. Financial integrity

All operations and transactions carried out by the Group are recorded in a true and faithful manner in the financial statements of each company, in accordance with current regulations and internal procedures: employees preparing accounting records specifically verify the existence of documentation corresponding to each entry.

Every funds transfer requires particular care, notably in relation to the identity of the recipient and the reason for the transfer.

M6 Group condemns all forms of corruption and trading in influence (see. Chapter V. 1.). Active and passive corruption, irrespective of type and target, both in the public and private sector, as well as trading in influence, are prohibited.





### Chapter III. Corporate and environmental responsibility

M6 Group pursues an active Corporate Social Responsibility policy and clearly signals its commitments to all its partners, including viewers, employees, customers, shareholders, suppliers, public authorities and civil society.

Faced with various corporate, social and environmental challenges, and as a commitment to all stakeholders, the Group has developed a Corporate Social Responsibility approach structured around three priorities which are directly linked to its activities:

#### 1. Talent management

The Group firmly believes that its employees are the cornerstone of its success. It is for this reason that the Human Resources Department places employee selection and subsequent loyalty building at the heart of its concerns, and endeavours to promote employee development in all aspects of their professional life.

#### 2. Respect for the public and responsibility towards society

Since the Group's activity is primarily intangible and cultural, the societal impact is the unifying thread of its commitment. Through its programmes, the Group actually enters into peoples' homes and must therefore put respect for viewers at the heart of what it does.

Compliance with the agreement between the Conseil Supérieur de l'Audiovisuel and the company M6 Métropole Télévision in relation to general and ethical obligations provides a framework that ensures a high level of societal commitment, particularly in respect of:

- Plurality of expression of schools of thought and opinion
- Public life
- Individual rights
- Protection of children and adolescents
- Integrity of information and programmes
- Defence and promotion of the French language

The Group's other channels must also comply with these standard obligations.

M6 Group is a stakeholder involved in society. In 2010, M6 Group created its own corporate foundation, having decided to get involved in the sensitive issue of prison life. In this way, the Group exercises its responsibility for a cause that unites its employees around a project financed by all Group companies. The Group also supports numerous other causes, including the development of innovative start-ups in the field of new media, compliance with intellectual property, and the enhancement and preservation of cultural heritage.

#### 3. Non-discrimination

Taking diversity into account is a key concern for the Group, both in relation to audiovisual content and the audience it addresses. This is reflected notably by a cross-organisational and acknowledged commitment to promote equality and better representation of women and minorities in the media.



### 4. Environmental responsibility

In addition to these three priorities, and even though the Group does not carry out activities that structurally present a significant impact on the environment, it is nevertheless attentive at its own level to its consumption and seeks to take initiatives in this area, both in terms of recycling and making the public at large aware of the challenges of sustainable development.

M6 Group also strives to inform employees of the challenges of sustainable development and of the relevant initiatives implemented within the Company. Each year, the Group carries out an assessment of its CO<sub>2</sub> emissions. The Group encourages employees to reduce and sort waste. The internal communications department organises employee awareness-building activities regarding issues such as reducing printing, food waste and electrical consumption, via various communication media (emails, the Group's social and collaborative network, screen displays, monthly newsletters, etc.).



## Chapter IV. Our commitments as an employer

We want M6 to be a good place to work. We are aware of the fact that our employees represent our main asset.

In this regard, M6 Group has specifically introduced a psychosocial risk prevention policy. As part of this prevention policy, the Group offers specific training to raise awareness among various Company stakeholders: staff representatives, managers, and human resources managers to ensure they all speak the same language, to identify risks and to respond accordingly.

In addition, as part of their annual appraisal, each employee is encouraged to consider their work-life balance. These indicators are then considered along with the employee's manager and Human Resources management in order to implement, where necessary, an action plan to ensure this balance.

Every employee is asked to read the section "Quality of Working Life and Psychosocial Risks" on the Group's social and collaborative network.

### 1. Health and safety

We provide our employees with a safe and healthy workplace by complying with the laws and standards applicable in the field of health and safety. Managerial staff in particular must ensure the existence of appropriate practices and protective measures in relation to health and safety, in order to ensure compliance with applicable laws and standards.

### 2. Diversity

All the decisions taken in relation to recruitment, hiring, discipline, promotion and other employment measures must be free of all discriminatory practices. We will not tolerate any discrimination against employees or candidates on grounds of race, nationality or ethnic origin, gender, pregnancy, marital or parental status, age, disability, religion or beliefs, sexual orientation or any other characteristic enacted in current anti-discrimination legislation or in the Company's principles.

### 3. Psychological and sexual harassment, sexist conduct

Every person has the right to be treated with respect and human dignity. Conduct that is contrary to this fundamental precept must be banned, and in particular that which is linked to psychological or sexual harassment, or sexist conduct.



## Chapter V. Our commitments as employees

### 1. Anti-corruption and anti-influence peddling policy

Conducting business lawfully and maintaining the highest ethical and professional standards in the course of our business are essential components of the Group's corporate culture. It is the obligation of every employee to adopt the correct behaviour in order to ensure these standards are maintained.

#### **Prohibition of all active and passive corruption**

Corruption is defined as conduct through which a person invested with a specific function, either public or private, solicits or accepts a gift, offer or promise in order to perform, delay or fail to perform an act falling, either directly or indirectly, within the scope of their duties.

Employees must make sure that under no circumstances do their day-to-day contract negotiation and performance activities give rise to behaviour or actions that could be classified as active corruption (the act of corrupting: offering/granting a benefit in return for something) or passive (act of allowing oneself to be corrupted: soliciting/accepting a benefit in return for something).

For example, an employee who secures a contract with a customer or strategic information for the Group in exchange for a monetary or expensive gift or excessive hospitality (accommodation, travel, meals, etc.), would find themselves in a position of active corruption. And vice versa, an employee who makes a purchase for the Group or who discloses any of the Group's confidential information in exchange for the receipt of money, an expensive gift or excessive hospitality, would place themselves in a position of passive corruption.

#### **Prohibition of all trading of influence**

The trading of influence is also prohibited. Trading of influence applies to a triangular relationship in which an individual having real (or supposed) influence on certain people exchanges such influence against a benefit provided by a third party wishing to profit from it.

For example, the trading of influence would take place in the event that a Group employee obtained administrative approval following a gift to an individual with the power to influence the decision maker of this approval.

#### **Prohibition of facilitation payments**

Facilitation payments are payments or any other benefits given for the purposes of performing or accelerating any administrative formalities that the donor has a legal right to obtain but for which the law does not require any additional payments to be made (for example, obtaining licences and authorisations, and the processing of official documents). Facilitation payments constitute a form of corruption and are therefore prohibited.

#### **Recommendations regarding offering or accepting financial or other benefits**

As a general rule, any gift or invitation must be deemed unacceptable if it could be regarded as likely to influence the behaviour of the recipient towards the donor.

Employees must refuse gifts of any kind if they are of a higher value than would be deemed reasonable if their company had to pay for them. In the event of difficulties in assessment, they shall consult their line manager or Company Management to consider the position to adopt.

When employees consider themselves to be in an embarrassing situation, that seems to them contrary to the principles previously set out, they must seek advice from their line manager and, if necessary, from the next hierarchical level. In the event that a superior asks them to act in a way that does not seem acceptable to them, they will have the right to request a written order.



### **Appropriate decision-making procedures and checks and preventive procedures**

The implementation of appropriate checks and preventive procedures will help to ensure that M6 Group companies are always in compliance with all applicable anti-corruption and anti-influence peddling principles and laws.

The Group is responsible for ensuring that “at risk” parties (any person holding a position tending to have a higher risk of exposure to corruption) are adequately informed and trained in relation to the rules imposed by this anti-corruption and anti-influence peddling policy and its application to their respective responsibilities.

### 2. Professional discretion – business secrecy

As a general rule, employees of Group Companies must exercise the utmost discretion in all matters concerning facts or information of which they become aware in the exercise of their duties.

This obligation responds to the requirement to protect the interests of Group Companies, their Shareholders and Staff, the public and their customers.

This discretion relates to all professional sectors, particularly finance, commercial, legal, administrative, communication, technical and programmes.

### 3. Communication

Any official statement in the name of Métropole Télévision and its subsidiaries may only be made by the Executive Board or its spokesperson appointed for this purpose. Any person outside M6 Group, wishing to obtain strategic, financial or commercial information should be directed towards the Communications Department or a member of the Executive Board.

Employees are required to avoid expressing publicly any opinion that may be taken to represent the position of M6 Group or its managers, to respect their obligation of professional discretion and loyalty towards the Group and to refrain from disclosing confidential information. These principles apply to all employees but especially individuals who may have a high public profile due to their role, their level of responsibility, their degree of public exposure or their prominent position on social networks. M6 Group, committed to the general principles related to freedom of expression, has set out rules and drawn up Guidelines for the use of social networks (see Appendix 3). This Charter is accessible on the Group’s social and collaborative network.

### 4. Confidentiality and Data Protection

As part of their activities, employees who collect, store, use and transmit data and information of a personal nature shall do so with the utmost care and in compliance with current laws and regulations. To do this, they must rely on the Company’s legal services.

### 5. External collaborations

The exercise of any other paid activity shall be subject to the prior approval of the Management, with the exception of part-time employees.

Employees may only accept any management duties or an appointment as a director, with the express written agreement of Management.

They will be prohibited from involvement in any commercial dealings, any solicitation and any consultancy, which could go against the interests of Group Companies.



They must also refrain from handling any transaction between themselves and one of the Group's companies on their own. Such transactions shall necessarily be handled by a third party, duly authorised by management.

### 6. Using and securing information technologies

All employees are aware of the fact that the information systems made available to them in their place of work, regardless of type, are the property of the Company. They undertake to use them for business purposes and to comply with appropriate practices in relation to IT security (password protection, approved technologies and licensed software in particular).

### 7. Intra-Group relations

When various companies within M6 Group put into place a contractual relationship between themselves, they must treat one another fairly on all fronts (legal, financial, HR, etc.). The aim must be to avoid disputes, and the greater interest of the Group must prevail over all other considerations.

### 8. Internal control

Every employee is involved in improving the management of the Group's risks and helps to identify and correct failings. To do this, every person contributes frankly to the reviews and audits carried out within the framework of internal control. There must be no impediment to the smooth progress of the audits and checks carried out by the internal audit department of the statutory auditors.

### 9. Political activity

In relation to politics, M6 Group respects the commitments of its employees who, in their capacity as citizens, exercise their freedom of opinion and participate in public life. This commitment must be exercised during employees' own time.

M6 Group takes a neutral position in relation to politics. It therefore refrains from funding political parties, and associations whose aim is to promote political parties or to support the campaigns of candidates for national or local office.

Employees are therefore not authorised to make financial contributions in the Group's name, nor to use their working time, or the Group's premises or equipment for political ends.

Due to its status as an audiovisual group and in line with the agreement it signed with the Conseil Supérieur de l'Audiovisuel, M6 Group must ensure plurality of expression of schools of thought and opinion. The Group must take care to present controversial issues honestly and ensure that different points of view are expressed.

### 10. Policy regarding the stock market

Since shares in our Company are listed on Euronext Paris, trading in the securities is thus regulated. The Company has drafted a Code of Conduct for Prevention of Insider Trading (see Appendix 4) in accordance with the AMF Guidelines of 26 October 2016 on continuous disclosure and the management of inside information and with the "Market Abuse" regulation, which came into force on 3 July 2016. This Code of Conduct is available on the Group's social and collaborative network, and all employees are asked to comply with it.



In summary:

- Any person who has inside information must, for as long as this information has not been made public, refrain from trading in the Company's securities or on financial products connected with these shares, from disclosing inside information, outside the normal course of their duties, or from recommending that another person trade in the Company's securities.
- Within its internal rules, the Company has defined the no-trade and closed periods during which trading in the Company's shares is prohibited.

### 11. Equity investments

Employees wishing to make personal investments of any kind whatsoever, with the exception of transactions made via a collective investment undertaking such as an open-end investment fund (SICAV), in companies likely to be in direct competition with Métropole Télévision and its subsidiaries shall inform in advance a member of the Executive Board, who will ensure no conflict of interests exists.

Employees will only be authorised to hold, directly or indirectly, shareholdings of more than 5% or €15,000 in a company pursuing similar or competing activities to Métropole Télévision and its subsidiaries, following the express agreement of the Executive Board. In this case, they shall submit an annual statement to the Chief Financial Officer of Métropole Télévision.



### Chapter VI. Implementation

#### 1. Decision-making guidelines

Should an employee ever have any doubts regarding the compliance of an action or decision with the principles of the Ethics Code, they must ask themselves the following questions:

- Is my action or decision legal and consistent with the Company's policy?
- Am I in a position to make an impartial decision in the interests of the Company and not promote a personal interest to the detriment of the Company?
- Can I take this decision in good faith?
- Would my decision stand up to close scrutiny by a third party?
- Does my action or decision protect the reputation of our Company?

If, in all good faith, the response to each question is "yes", it is highly likely that the action or decision is correct. If there are doubts in relation to certain questions, the employee must neither act nor take any decision without first seeking the counsel of a competent person (see. Paragraphs below).

#### 2. Disclosure requirement

Employees have a duty to inform their immediate superior without delay in relation to failings that they have observed and which prevent them from complying with the objectives assigned to them. Employees are required to inform their hierarchical superiors of the external circulation of information about the Group that they know to be privileged.

#### 3. Contacts for any questions regarding the Code of Ethics and Professional Conduct

Within M6 Group, should you require any advice or if you wish to express your concerns regarding the integrity of certain conduct, or if you wish to suggest an improvement to our compliance procedures, we will always listen to what you have to say.

Furthermore, any act of retaliation against employees who have expressed concerns regarding the integrity of certain conduct is prohibited.

Many issues concerning behaviour in the workplace can be resolved through constructive discussion with the people directly involved, or through an interview with the appropriate in-house contacts. Moreover, every employee must be able to raise the issues they are concerned about in relation to the Code of Ethics and Professional Conduct, or report a violation to a direct or indirect line manager, or to the management of their company.

#### 4. Professional whistleblowing system

In accordance with Decree n° 2017-564 of 19 April 2017, a professional whistleblowing system, as detailed below, has been introduced within M6 Group.

##### **Whistleblower**

Law n° 2016-1691 of 9 December 2016 relating to transparency, anti-corruption and modernising the economy, known as the "Sapin II" Law, defines a whistleblower as such: a whistleblower is an individual who reveals or reports, acting selflessly and in good faith, a crime or an offence, a serious and clear violation of an international undertaking which has been properly ratified or approved by France, of unilateral action of an international organisation taken on the basis of such an undertaking, of the law or regulations, or a serious threat or loss for the general interest, of which the individual became personally aware.





The whistleblowing system is therefore strictly limited to the most serious situations such as those listed above and cannot be used outside such situations. An employee who reveals or reports, even in good faith, situations not fulfilling the above-mentioned conditions, is therefore not deemed to be a whistleblower.

Similarly, the misuse of the system may lead to both disciplinary measures and legal proceedings.

Conversely, use of the system in good faith, even if the actions are subsequently found to be unproven or no further action is taken, shall not lead to penalties.

### **Whistleblowing procedure**

Whistleblowing is voluntary. Employees may not be punished for not whistleblowing.

Whistleblowing involves three consecutive steps:

- **Step 1:**

The report by the employee is brought to the attention of the direct or indirect line manager of the employer, or to the Group's Head of Ethics and Professional Conduct.

The Group Head of Ethics and Professional Conduct is Eric d'Hotelans.

The facts, information and documents forming the subject matter of the whistleblowing are forwarded by the whistleblower to the Head of Ethics and Professional Conduct, in any format whatsoever, and by any means of communication: e-mail (Responsable-ethique-deontologie@m6.fr), telephone (+33 1 41 92 61 19), letter, in person.

As soon as he receives a report, the Head of Ethics and Professional Conduct acknowledges receipt via the same means of communication to the source of the report. He informs them of the reasonable and foreseeable timeframe necessary for the consideration of their query as well as the procedure under which they will be kept informed of developments regarding the report.

The whistleblower is notified of the completion of verification procedures regarding the admissibility of the whistleblowing and the reported facts.

- **Step 2:**

In the absence of efforts by the Head of Ethics and Professional Conduct to verify the report, within the reasonable timeframe indicated, the report may be submitted to judicial or administrative authorities, or to professional bodies.

- **Step 3:**

As a very last resort, in the event that the judicial or administrative authorities or professional bodies contacted fail to process the report within a period of three months, the alert may be made public.

In the event of serious and imminent danger or where there is a risk of irreversible damage, the alert may be reported directly to the judicial or administrative authorities or professional bodies. It may be made public.



### **Role of Defender of Rights**

Any individual may address their report to the Defender of Rights in order to be referred to the appropriate alert collection body.

### **Confidentiality of reports**

Alert collecting procedures ensure strict confidentiality regarding the identities of the employees making the report, the persons covered by the report and the information collected.

Its implementation imposes accountability on everyone and requires the information to be provided selflessly and in good faith.

The Head of Ethics and Professional Conduct is subject to a more stringent non-disclosure obligation.

Every precaution is taken to ensure that the identity of the employee who triggers the alert, the person covered by the report and the information collected are treated in the strictest confidence at every stage of the reporting process, including in the event of communication to third parties from the moment it becomes necessary and for the sole purpose of verifying or processing the report.

With the exception of disclosure to the judicial authority, aspects that may identify the whistleblower may only be disclosed with their agreement.

With the exception of disclosure to the judicial authority, aspects that may identify the individual accused by an alert may only be disclosed once the merits of the alert have been established.

The act of disclosing confidential information is punishable by up to two years in prison and a fine of up to €30,000.

### **Assessment of the alert and retention of reports**

Every alert gives rise to a preliminary assessment by the Head of Ethics and Professional Conduct to verify that it falls within the scope of the whistleblowing system.

Data relating to an alert considered as not falling within the scope of the whistleblowing system is destroyed immediately.

Data relating to an alert that does fall within the scope of the whistleblowing system is retained for a period of two months following completion of verification procedures except when disciplinary or legal proceedings are initiated against the individual accused by the report or the originator of a wrongful report. In this case, data is retained until completion of the proceedings.

This whistleblowing system is subject to automatic processing that is disclosed to the French Data Protection Authority (CNIL).

Any individual identified in the system enjoys a right of access and correction, which they may exercise by contacting the Group Head of Ethics and Professional Conduct.

### **Protection of the whistleblower**

No individual can be excluded from a recruitment procedure or from access to a placement or a period of professional training, and no employee may be punished, dismissed or be the subject of direct or indirect discriminatory measures, notably in relation to remuneration, within the meaning of Article L. 3221-3, of incentive or share distribution plans, training, reclassification, assignment, qualification, classification, professional promotion, or contract transfer or renewal, as a result of having reported an alert in compliance with legislation and this Code.