

# We are Banijay.

We are savvy entrepreneurs,  
United in ambition,  
Diverse in thinking,  
And committed to working  
together in the very best way.

**This is Our Code of Conduct**

# Creative. Responsible. Entrepreneurial.

Welcome to Banijay – a place where you can strive and thrive in equal measures; a group in which ambition is welcomed, innovation is championed, and creativity is key.

## We are a media and entertainment powerhouse

Every day, we touch the lives of millions of people worldwide. And with that comes huge responsibility. While the quality of our productions globally is a given, this quality needs to also be evident in the way in which we do business, treat one another and make decisions. Nurturing an environment of trust, honesty, inclusivity and respect, we expect our teams and the parties we partner with to conduct themselves with consideration, integrity and pride at all times. And should you notice something that doesn't feel right, we ask that you speak up at [speakup.banijay.com](https://www.banijay.com/speakup).



**Marco Bassetti** CEO

## "Storymaking set free" is what we stand for

We're built on entrepreneurial spirit, and we have guiding values and principles to ensure we adhere to legal and compliance obligations and maintain a workplace where everyone feels welcome and safe. We all have a personal responsibility on this journey – by following the advice and aligning with the values and principles laid out over the coming pages, we can make a difference while maintaining our fantastic reputation.

Please take time to read this document. If you have any questions, do feel comfortable about asking for help.



This Code of Conduct applies to everyone working for Banijay, whether as an employee, freelancer, consultant, temporary or permanent staff member, or in any other capacity.

The Code of Conduct is easily accessible on the Banijay website at [www.banijay.com](https://www.banijay.com).



# Storymaking set free

We commit all our entrepreneurial energy and drive to unleash the best on-screen storytelling for the world. We call this storymaking.

There's no one Banijay way to make stories; we clear the paths our people want to explore. We let our storymakers have their spark, then add the oxygen to make it catch fire.

We want to create an environment in which everyone feels welcome and excited to work for us, and with us, in telling the best stories. We hope this Code of Conduct will help guide your actions and make Banijay a great place to work wherever you are in the world.



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# This is what makes Banijay... Banijay!

## Premium talent & IP

We are greater than the sum of our parts – a collective of the best creative talent in the world, collaboration sits at the heart of all we do. Partnering to grow ideas and maximise on them worldwide, we have nurtured a growing catalogue spanning 120,000 hours of premium, high-quality content.

## Independence

Our independence is what sets us apart. We are agile and proud to be able to partner with any buyer or seller worldwide and subsequently provide talent with a home where they can be creatively free.

## Collaborative entrepreneurialism

We are a lean team with big ambitions. We encourage autonomy, promote independent thinking and decision-making, while driving a sense of unity through a shared collaborative spirit. And while there is one goal, we believe in the power of enabling and trusting our teams to use different paths to get there.

## Local wisdom, global ambition

We give our talent the space, freedom and incentivisation to create the most compelling content and IP both locally and globally. We believe in taking creative risks to succeed and by fostering our regional know-how to build innovative universal super brands and premium unscripted and scripted hits, we have become a go-to for quality, no matter the language, no matter the genre and no matter the platform.



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# What do we believe in?

Your welfare is our priority, and we want you to always feel safe and comfortable in your work environment and in how we all work together.

This is our pledge to you. We believe in, and encourage our leaders to make tough decisions in support of our universal values, which include:

- ④ Driving equality and inclusivity by cultivating a respectful and diverse setting for our talent in front of and behind the camera, in the office, on location, and anywhere in the workplace
- ④ Guaranteeing religious and political freedom, protecting human rights and fighting discrimination
- ④ Supporting teams and contributors with attention to their physical and mental welfare
- ④ Ensuring thorough investigations and appropriate consequences in cases of violations of the code of conduct
- ④ Promoting an open culture where all individuals at all levels are empowered to speak up
- ④ Looking after our environment by striving towards carbon-neutral production



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# How we work with each other



We want Banijay to be a place where the right decisions and ethical choices are easily made and easily shared, and where you feel valued, respected and heard.

## Feeling at home

We aim for a representative and inclusive workforce that thrives on diverse and creative perspectives.

## Showing respect, dignity and mutual understanding

We believe in equal opportunity, during recruitment and employment, and promise to develop and enhance your talents, skills and capabilities. We also expect all our colleagues to show respect, mutual understanding and dignity towards one other.

## Maintaining health and safety

We'll do everything we can to protect our employees, freelancers, participants, audience, and all those we work with. Please help us by following appropriate instructions, and by looking after your own physical and mental health and safety as well as that of anyone else affected by how you behave.





## Building trust

We earn and maintain trust through doing business with integrity and to high standards. We want to be as accurate and impartial as possible, reflecting a breadth and diversity of opinion. For example, by asking audiences for informed consent to avoid misleading them.

## Caring for children's welfare

We need to keep the children and young people we work with safe, and put their interests before editorial concerns. For example, by speaking and behaving appropriately and professionally around them.

## Respecting human rights

We respect human rights with a culture focussed on fair treatment for all. We do not allow modern slavery, forced labour or human trafficking anywhere in our business.

## Being fair

Being unbiased about our subject matter and welcoming everyone's opinion is important. We are fair and open-minded when looking at evidence and material facts. We treat contributors, audiences and all those we work with, with respect.



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# We say no to...

## Drugs and alcohol

We do not accept the use, possession, distribution, transferring or selling of illegal drugs while working for us – whether on our premises, in our vehicles, or anywhere else. It also means we cannot let you work for us, or represent us, if you are under the influence of drugs, alcohol or other substances.

## Harassment, bullying or discrimination

Having respect for each other earns you respect in return and builds an inclusive and supportive environment with collaboration and teamwork. A respectful work environment also reduces the potential for conflict, increases morale, and creates a friendlier place for everyone. In addition, it is likely to be more rewarding by ensuring everyone can use their talents fully to achieve their potential.

We acknowledge that differences in attitude, background or culture can mean that what one person sees as harassment, bullying or discrimination, may not be perceived in the same way by someone else. When deciding whether someone has been bullied, harassed or discriminated, we focus on the impact made, rather than on the motive or intent, and whether the behaviour is unacceptable by normal standards.

## Harassment

Harassment is any unwanted physical, verbal or other conduct that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive work environment that's demeaning or unacceptable. It may be directed at one person or at several people. It may be persistent or a one-off incident. Harassment may be related to age, disability, gender reassignment, marriage and civil partnership status, pregnancy or maternity, race, religion, belief, sexual orientation or any other personal characteristic. Sexual harassment is unwanted physical, verbal, non-verbal conduct of a sexual or offensive nature; from touching or pinching to pushing or fooling around, which creates an intimidating, hostile, degrading or offensive environment. It includes unwelcome sexual advances, but also suggestive or offensive behaviour, emails, texts, etc. Gestures or expressions can amount to harassment too.

## Bullying

Bullying may be described as offensive, intimidating, malicious or insulting behaviour. It can be an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure someone. Bullying and harassment are related and are usually intentional.

## Discrimination

Discrimination takes place when one person or a group is treated less favourably than others because of their race, gender, gender reassignment, marital or civil partner status, disability, age, religion or belief, sexual orientation or other factors unrelated to their ability or potential.



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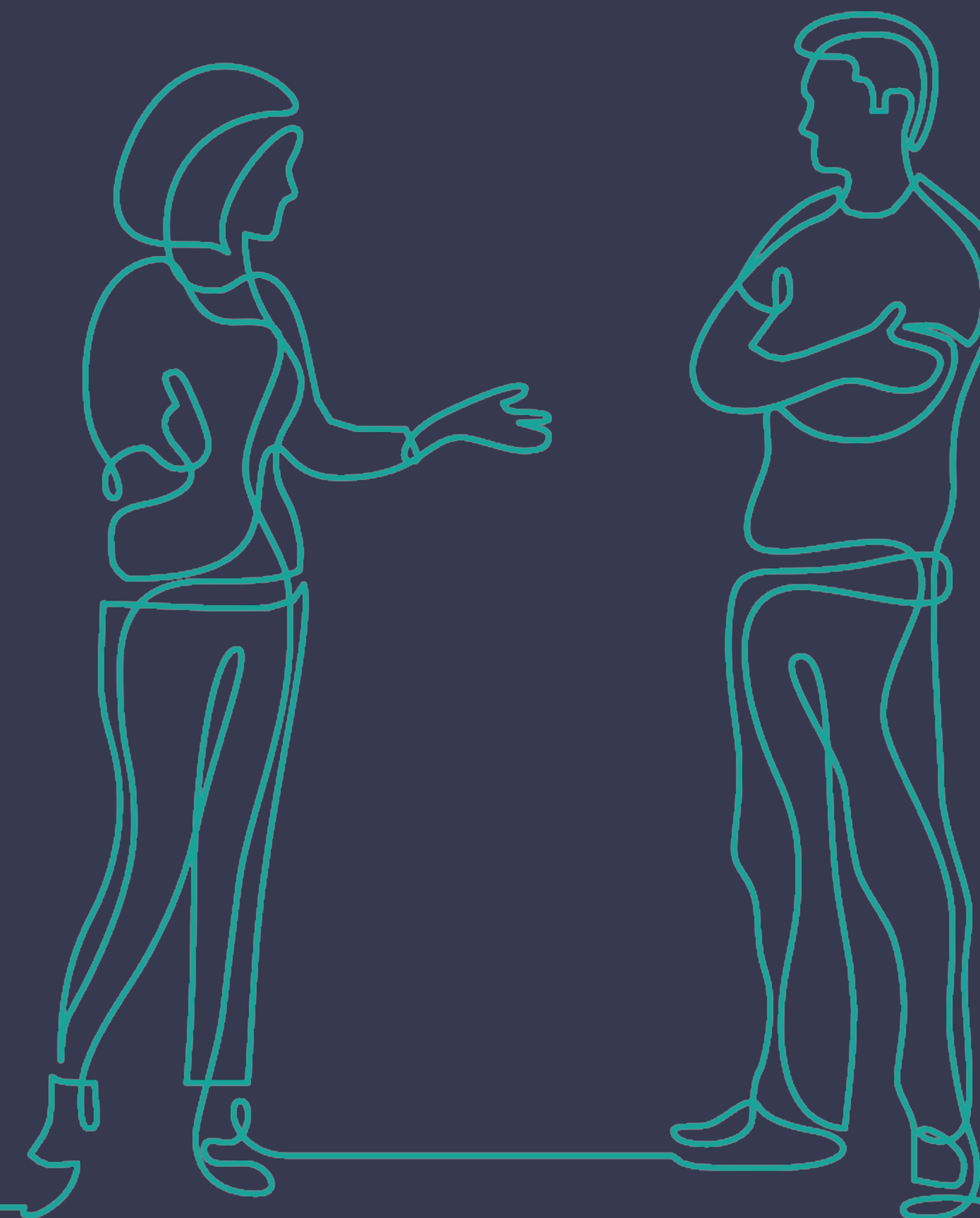
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# What to do...

If you feel bullied, harassed or discriminated against, and you are comfortable having an informal discussion with the person involved, let the person know that their behaviour is unwelcome or upsetting. An informal discussion or an email may help them understand the effects of their behaviour and agree to change it. (You can talk in confidence to your line manager or to Human Resources for advice. If your concerns are about your line manager, please speak to their manager.)

If handling the matter informally doesn't work or is not possible, you are encouraged to speak to Human Resources. Some OpCos have appointed an internal or external confidential representative (CR) who's available to help anyone, whether an employee, contractor or freelancer. The CR is specially trained to provide confidential advice, deal with issues and support you. If the situation cannot be appropriately dealt with locally or you don't feel safe, please feel free to raise your concerns via the Banijay Speak Up! Hotline at [speakup.banijay.com](https://speakup.banijay.com). Please see [page 24](#) for more details.



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# Helping to make the world better for all

As a media and entertainment powerhouse, we take our responsibilities very seriously within our local communities and in doing our best for our planet.

## Improving our carbon footprint

We are taking serious steps to reduce our overall impact on the environment and drive change, as a company and in educating our audiences.

## Taking initiatives

**Belong:** The network fosters inclusivity, equality and diversity in cultures, age, gender, disability, politics and religion so that we are accessible to everyone, everywhere.

**Pride:** Our LGBTQIA+ network celebrates our lesbian, gay, bisexual, transgender and queer community. It connects our business with external communities championing all sexual orientations and gender identities.

**Elle:** We're committed to attracting, retaining and progressing women in our industry through global schemes and narratives.

**Baniday:** We put down professional tools for a day each year to help local charities, governments and not-for-profit organisations where we live and work.



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# How we do business

We act fairly, responsibly and with integrity towards everyone affected by what we do and how we do it. For example, our stakeholders, shareholders, investors, customers, employees, contributors, suppliers and business partners, competitors and governments.

At Banijay, we stand for doing business in the right way – ethically, legally and professionally. That means not only complying with the laws of the countries where we operate but going above and beyond to work with absolute integrity and transparency in everything we do. When adapting to local cultural differences, we keep within the boundaries of the law and responsible conduct.

If you are ever unsure about something, ask yourself:

Is it legal?

Does it comply with our Code of Conduct?

What would someone I trust and respect say about my actions?



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## Bribery and corruption

We have a zero-tolerance policy against bribery and corruption. We do not offer, give, solicit, or accept bribes or kickbacks, either in cash or in the form of any other thing or service of value.

There are two types of bribery: **public bribery** is bribing a government official. Examples include giving or promising money or something of value to influence a government official to grant a licence or permit or stop a scheduled tax audit. We also don't allow what's known as 'speed', 'grease' or 'facilitating' payments to government officials to expedite or to secure the performance of a routine governmental action. **Commercial bribery** is bribing a private party, like an employee or agent of another company. Examples include paying a kickback or an over-the-top gift to a programme director of a network to persuade them to buy our shows.

Most countries have local regulations relating to anti-bribery and corruption. In addition, there are also regulations that have a global reach – for example the Foreign Corrupt Practices Act (1977) in the US (FCPA) and the UK Bribery Act (2010) (UKBA). Both regulations have the power to apply significant penalties to individuals and companies that are non-compliant, including those outside the US and the UK, and can even prevent them from continuing to operate.

At Banijay, we operate internationally and in locations with an increased bribery and corruption risk. Wherever you are, always be careful to follow the law, and always be aware of how your actions may appear to others.



## Bribes and kickbacks

A **bribe** is something of value that is given in an attempt to improperly influence business actions or decisions, or to acquire improper advantage. 'Something of value' is not always in the form of money; it can also mean a favour. Examples include employing a family member other than through an officiated recruitment process, making a donation to a charity as part of a business deal or over-the-top hospitality. A **kickback** is the return of a portion of a sum already paid or due to be paid, as a reward for favourable business arrangements.



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## Government official

An employee or official (or family members and relatives) of a government or an agency, ministry, department or controlled company of a government. This includes, most importantly for Banijay, public broadcasters.

We do not offer, give or promise anything of value to Governmental Officials. For government officials in other countries, please check with your local legal department and also make sure everything is in line with this Policy and applicable laws.

Each OpCo is required to keep (financial) books and records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. All accounts, invoices and other documents relating to dealings with third parties should be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

We also require that all third parties acting on our behalf (for example, agents or distributors) comply with relevant laws and our policies. Any bribe paid by a third party acting on our behalf or at our request, could be seen as a bribe conducted by us. If an action is illegal for us to do, it is also illegal if a third party does it on our behalf or at our request.

We screen our agents and distributors before engaging with them. We insert legal language into their contracts, wherever possible, binding them to avoid bribery and corruption. Please contact your legal department for guidance.

## Money laundering

This is when illegally obtained money (“dirty money”) is turned into “respectable money” or other assets. We don’t engage in transactions involving proceeds like this from criminal activity. Please report any suspicious activity to your local legal team.



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## Conflicts of interest

This is when personal interests or activities might influence how we do our jobs, ethically, morally and professionally. Conflicts and the appearance of conflicts raise questions about whether we are acting ethically, morally and professionally.

There are many situations that could present a potential conflict of interest. While it is impossible to list all of them, there are certain situations where conflicts often arise. It is important that you are familiar with these situations so you can recognise them.

Always consider whether your actions are in the best interest of the company. Line managers must also be alert to potential conflicts of interest amongst their team members.

If you have a potential conflict of interest at hand but feel it is appropriate to pursue the transaction or relationship, you need to obtain sign-off from your MD or from any other person you are reporting into (for example, where you are an MD).

**If you have a financial advantage (in addition to your regular compensation benefits) in transactions involving Banijay**

**If you enter into a commercial relationship, on behalf of Banijay, with a friend or family member, or a company managed by you, a friend or family member**

**If you carry on a business in your own time that is similar to your work for us**

**If you work privately for one of our business partners or competitors or have a financial interest in them**

**If you exploit your position for personal gain or for the benefit of a friend or family member**





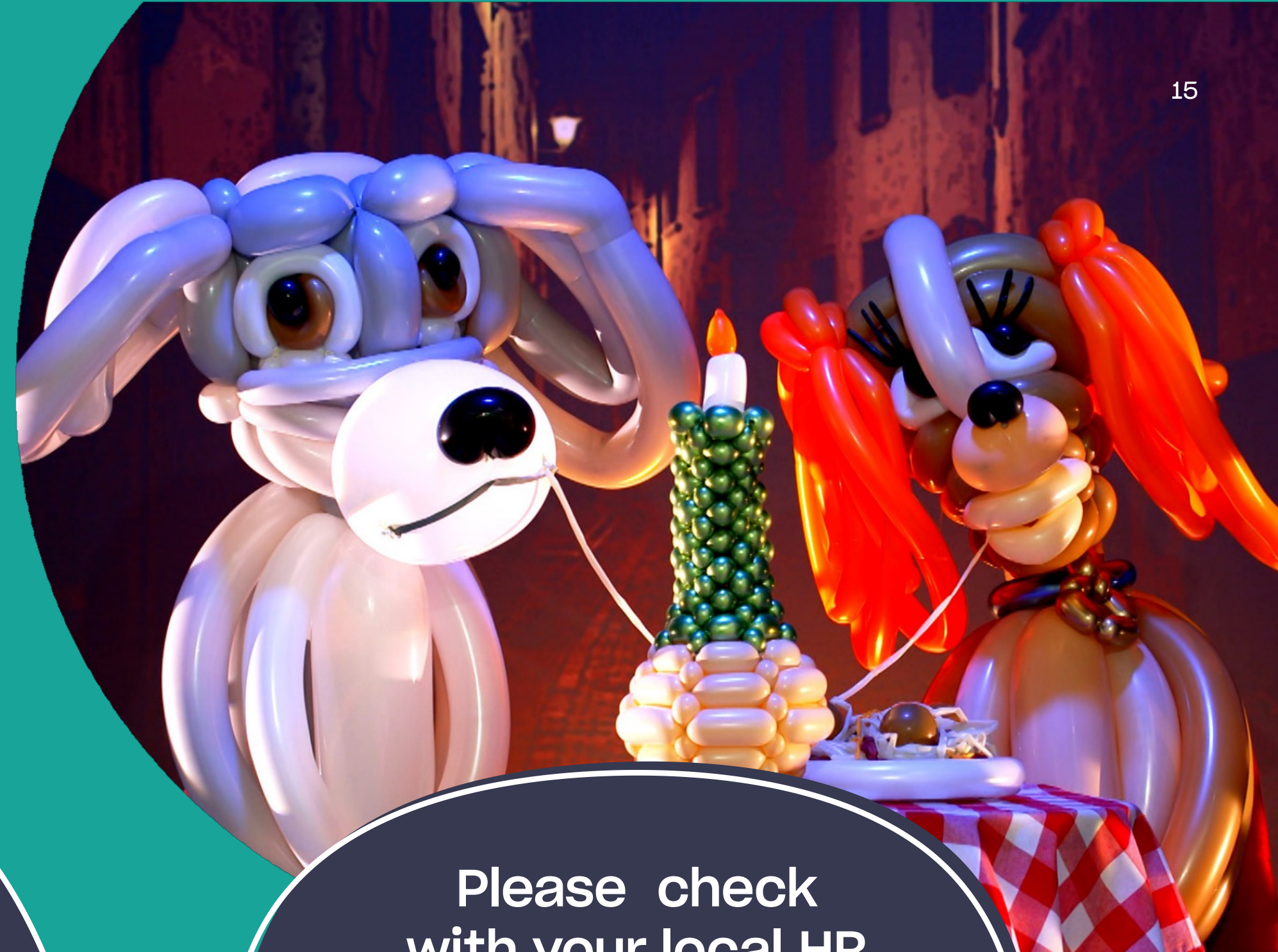
## Gifts and hospitality

Gifts and hospitality are part of our daily interactions with third parties. However, we don't allow soliciting for, or acceptance of, hospitality or a gift that might reasonably be seen as having an improper influence or where compliance with laws could be questioned.

If you're uncertain about giving or accepting a specific gift, think how the gift might appear to someone else. Would they be allowed to have it? Would their integrity come under question?

**Whoever gives or receives the gift or hospitality expense is responsible for making sure it's reasonable. For example, consider:**

- ② The type of gift or hospitality, and if it's appropriate to the culture/ geographic region in which it's given and in line with industry practices
- ② The value and the recipient
- ② Whether they have the authority or ability to make or influence a decision (especially if it might influence our business interests)
- ② Frequency and timing
- ② The relationship between the person receiving and person giving
- ② If the gift or hospitality is allowed under local law and complies with our business codes



**Please check with your local HR department for limits for giving and receiving gifts and hospitality.**



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## Fair competition

We're strong believers in vigorous but fair competition within the framework of applicable laws and regulations in the countries in which we do business. We won't enter into any arrangements that would limit competition, both written or verbal, implicit or explicit. For example, price fixing, bid rigging or market sharing.

Always be careful in what you say and do when dealing with, or are in the company of, competitors – particularly when the discussion is commercially sensitive. Do not use words like “dominate”, “destroy/eliminate competition”, “control the market” or similar expressions. These can be taken the wrong way by competition authorities.

In some markets, we may be seen to have a dominant or market-leading position, which means we need to be extra careful – especially if to the exclusion of competitors. For instance, if we are making, beyond standard terms of business, the sale of one product conditional on the sale of another or, entering long-term or exclusive agreements.

Antitrust laws are complex and differ per territory; please reach out to your local legal team for guidance.

## High risk scenarios can include but are not limited to:

- ⚠ Contact with competitors at conferences or trade association meetings beyond typically expected exchanges in these types of meetings
- ⚠ Partnerships with competitors through joint buying from suppliers or selling to clients
- ⚠ Long-term exclusive contracts with customers or suppliers beyond industry standard terms of business



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# Dos and Don'ts

A simple guide to help you in dealings with competitors



## Be careful to...

- ✓ Make independent business decisions
- ✓ Get in touch with your local legal department before entering into joint ventures, acquisition deals or any other cooperation with competitors
- ✓ Be aware of the risks when going to conferences and trade association meetings where competitors are present as well. You may decide to prepare a written agenda when you meet a competitor if you feel it appropriate. Be aware if something is happening in a meeting or event; in case of serious concern, let other people know that you don't agree, and remember you are entitled to leave the meeting
- ✓ Speak with your local legal team about any contact with a competitor that raises a question or doubt in your mind

## Do not

- ✗ Enter into an agreement with competitors about:
  - ⊕ Prices, bids, payment terms or output
  - ⊕ Dividing customer groups, suppliers, markets, products or territories
  - ⊕ Excluding customers or suppliers
  - ⊕ Cost structures, margins or profits
- ✗ Discuss these topics with competitors (Of course, general conversations around markets, trends or evolutions are permitted)
- ✗ Share commercially sensitive information with a competitor
- ✗ Make public statements intended to inform competitors about our future plans unless already public or not raising any competition difficulty (in case of concern, please reach out in advance to your local legal team)



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## Sanctions

Sanctions are laws or regulations passed by national and international bodies, restricting transactions that involve certain countries, companies, individuals, services and goods.

A sanctions violation not only puts our business and reputation at risk but can also lead to high fines, civil and criminal penalties, and even denial of banking and other services.

We comply with all applicable trade sanctions and regulations and we will not be involved with persons, entities, governments, or countries if doing so violates applicable sanctions.

- ⊗ **Screening:** Higher-risk third parties as indicated in our Banijay screening guidelines need to be screened before undertaking any transactions with them.
- ⊗ **Authorization from compliance:** Due to heightened restrictions on Russia and Cuba, authorization is required from the Group Legal department and Group Executive team before taking part in any transaction with individuals and entities located in or owned/controlled by parties located in these countries.
- ⊗ **Prohibited countries:** Due to the business and compliance risks involved, we do not engage in transactions that directly or indirectly involve Crimea, Iran, North Korea, and Syria.

We will keep you informed as these lists evolve.

If you have any questions or concerns about complying with sanctions, please contact [compliance@banijay.com](mailto:compliance@banijay.com).



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# How we protect information and ideas

Our company is largely built on content; our intellectual property is therefore one of our most important assets. Keeping business information and ideas safe, whether our own or others', is crucial to our business success and reputation. We protect them against loss, infringement, improper use and disclosure.

Please respect and protect this confidentiality by not divulging information to people outside of our network – even family or friends – or discussing matters in public places. We'd also ask you to take great care with confidential documents.



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## Maintaining privacy

We're transparent about how we handle personal data and follow local privacy and data protection laws. We protect the privacy of personally identifiable information about customers, employees, participants in our shows, audience, business partners and other people and will only process personal data with good reason and for specified legitimate purposes.

When handling personal data, we follow these privacy principles:

- ✓ **Lawfulness, Fairness and Transparency:** We always process personal data in this way and inform individuals of this and their rights through a clear and detailed privacy policy.
- ✓ **Purpose Limitation:** We only collect personal data for specified, explicit and legitimate purposes and do not process it further in a manner incompatible with those purposes. We only process personal data for the purposes indicated in the privacy policy given to the individual.
- ✓ **Accuracy:** Personal data should be accurate and, where necessary, kept up to date. We delete or update incorrect or out-of-date data right away.
- ✓ **Storage Limitation:** We don't keep data in a way that someone could be identified from it for any longer than necessary for the purpose for which it was processed.
- ✓ **Data Minimisation:** We make sure that personal data is adequate, relevant and limited to what is necessary in relation to the purpose for which it is collected.
- ✓ **Integrity and Confidentiality:** We use appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and accidental loss, destruction or damage.
- ✓ **Privacy by Design and by Default:** When developing products and services, we consider the protection of personal data from the design phase. Measures are implemented to ensure that, by default, only personal data that is necessary for the purpose of the processing is processed.
- ✓ **Accountability:** We are responsible for and we must all be able to demonstrate compliance with these principles.

If you're not sure what is permissible, ask your legal department. Data breaches can expose the Company to penalties and harm our reputation.



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## Respecting intellectual property

We're home to some of the world's top scripted and unscripted brands and multi-platform titles.

Our IP mustn't be infringed or used and distributed without the right permission. Using "pirated" or illegally obtained intellectual property also isn't allowed: in fact, copying or using materials beyond applicable legal boundaries without the owner's consent is theft.

## Keeping track of information

Any information has to be recorded and reported in a fair, timely, full and accurate way, following good business practices, applicable accounting standards and local laws. All documents, files, records and reports that you acquire or create while working for us are our property. Please only remove originals or copies from your office if it's to do with work (and return them when required).

## Using communication tools

Your phone, e-mail, Internet and other communication facilities and appliances are our property for business purposes only. You can use these within reason, so long as it doesn't interfere with your work. We may access and review data held, following applicable legislation and best practices. Any evidence of wrongful use may lead to disciplinary action. Always be mindful that email, voicemail messages and internet usage are potentially subject to interception and may be disclosed during litigation or an investigation.

All social media is public and should therefore be used in a way that's transparent, truthful and sensible, and that won't cloud Banijay's reputation.



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# How we protect ourselves online

It's up to each and every one of us to stay secure online and protect data, wherever we work – including from home. This ranges from using strong passwords to not discussing confidential things that someone might overhear.

## Stay hacker-proof

Criminals are becoming increasingly sophisticated, and there's the constant risk of hackers trying to break into our systems. (Working from home? Make your router hacker-proof by adding a password and disabling UPnP and port forwarding.)

## Stay safe

Don't download, install or run any software on our equipment without getting it approved. Always back up data, keep your devices updated and never use free WiFi.

## Stay secure

Create a strong password (with a different one for each account) and change it regularly. It's also a good idea to turn on multi-factor authentication, such as face ID.

What if I've received an urgent email from a contractor with an attachment. It seems pretty genuine though it's from a team member I don't know?

Don't click on the link or open the attachment: computer viruses are often sent this way and can cause significant damage to our information. Always double-click the email address to check the sender's authenticity and see if the email is littered with spelling or grammatical mistakes. If you've any concerns or questions, contact [GroupIT@banijay.com](mailto:GroupIT@banijay.com).





# What to do if you feel concerned

It's up to all of us to speak up if we see something wrong, so that the problem can be resolved.

You can report any serious concerns about the conduct of anyone working for or at Banijay. These might, for example, relate to non-compliance with laws and regulations or internal policies, financial malpractice or concealment of malpractice, inappropriate relationships with suppliers or clients or discrimination, bullying or harassment.

People are often reluctant to be the one who speaks up, so we encourage everyone who becomes aware of serious wrongdoings to raise their concerns within the company. Speaking up on behalf of an inclusive and supportive company culture is part of your right and responsibility as an employee.

We will not tolerate harassment or victimisation of anyone raising a genuine concern or question. Even if you are mistaken, you won't have anything to fear.

All disclosures will be treated in confidence and every effort made not to reveal your identity, if you wish. However, we may be required to disclose your identity for disciplinary or other purposes. If so, we will always discuss with you the best way to proceed. We'll make sure you know who is handling the matter, how to contact them, and if we need help from you. We will give as much feedback as possible without violating a duty of confidence we owe to someone else.

Do feel at ease to discuss job-related concerns or complaints with your line manager first or another management representative you are comfortable with. If this isn't possible for any reason, or if you're not satisfied with the response, there are always others you can contact.

Making a knowingly false claim against a colleague is a serious infraction.



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**You can contact your local HR representative or confidential representative, if they are in your workplace. Alternatively, you can always contact:**

### **Your Group HR representative**

Anne van Sprang

Email: [a.vansprang@banijay.com](mailto:a.vansprang@banijay.com)

Phone: +33 1 43 18 91 65 / +33 6 19 13 07 56

### **Your Group Compliance Officer**

Irma Dekkers

Email: [irma.dekkers@banijay.com](mailto:irma.dekkers@banijay.com)

Phone: +31 6 133 988 29

## **The Banijay Speak Up! Hotline**

The third-party hotline is available 24 hours a day, 365 days a year via a secure internet website at [speakup.banijay.com](https://speakup.banijay.com). If you have an ethics or compliance query or an enquiry regarding a company policy, ask a question and file a report. The website also contains toll-free local numbers to speak to someone directly.

If you're on Workday, the link to the hotline is on the homepage via the Speak Up! tile.

When using the hotline, you may make an anonymous report or you may choose to reveal your identity. We encourage you to provide as much information as possible to support the investigation. All the information provided will be treated confidentially, safeguarding your identity and protecting you against retaliation if the report was made in good faith.



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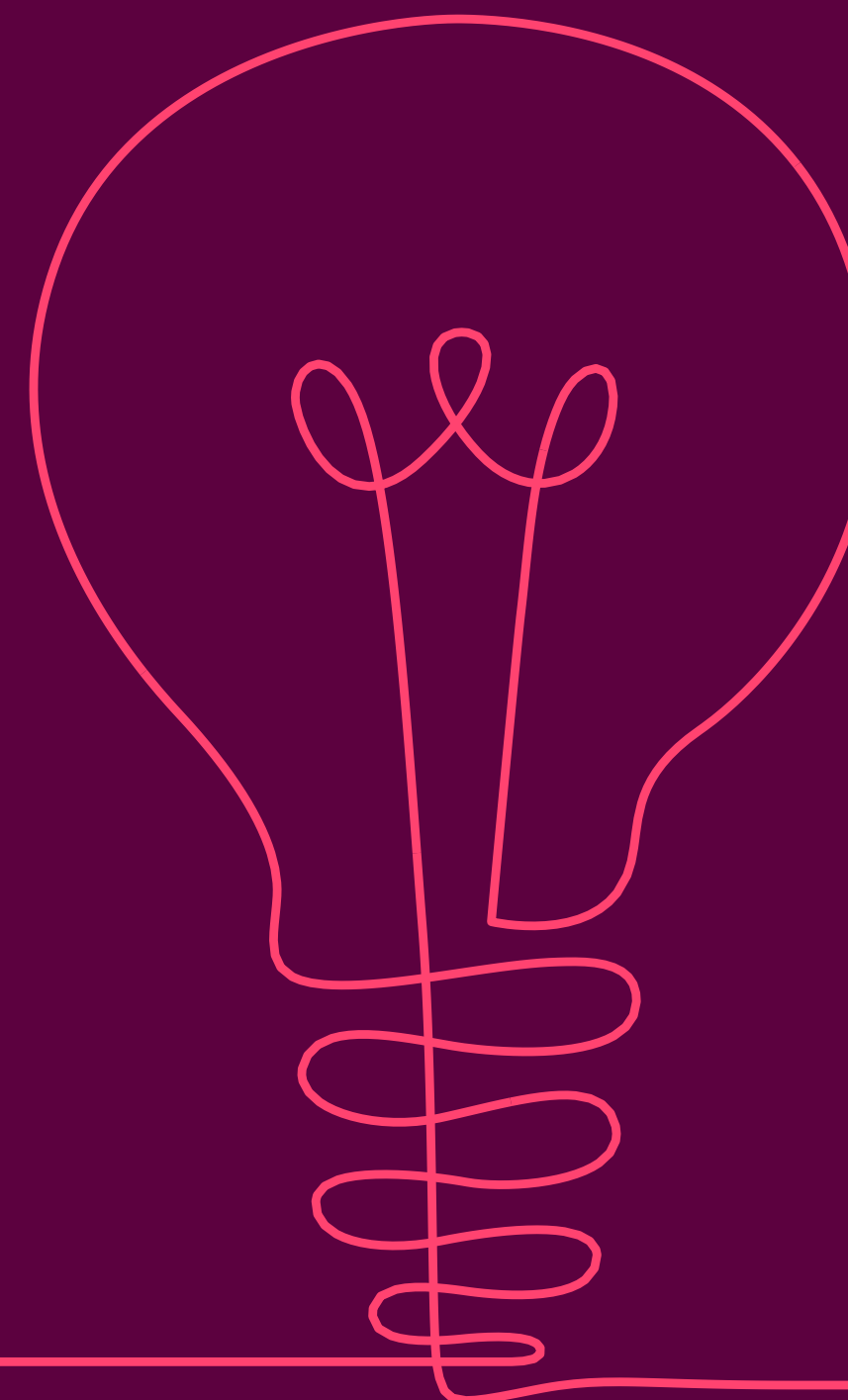
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# Having a light bulb moment?

Speaking up can also be hugely entrepreneurial... If you have an idea, we'd love to hear from you – whichever department, production company or territory you're in. It can be for anything; from the way we work to supporting a charitable initiative to an idea for the next big global brand!

Get in touch at [Banijaygroupcomms@banijay.com](mailto:Banijaygroupcomms@banijay.com).



Who We Are



What Defines Us?



Our Pledge



Our Expectations



Our Commitments



Our Business Ethics



Maintaining Confidentiality



Cyber-Security



Speaking Up