

# Global Human Rights Policy



# Policy Purpose

**The defense and protection of human rights are much more than just words at Banijay Entertainment.**

The business is aware that its activities may have an impact on human rights, and it fully assumes its responsibility in this respect.

Deeply committed to respecting the dignity and rights of every individual, Banijay has developed this Global Human Rights Policy to clarify and reaffirm its commitments in this area.

Banijay and its subsidiaries are aware that monitoring respect for human rights is an ongoing process, requiring constant evolution in order to keep pace with changes in the operating environment. In practice, monitoring, influencing, diligence, and transparency are key to guiding Banijay's actions when it comes to respect for human rights.

This Policy has been drafted by the group's ESG and human resources departments, in consultation with our legal and procurement departments, and aligns with Banijay's obligations under the Corporate Sustainability Reporting Directive (CSRD), which requires transparent, auditable disclosure of human rights policies, risks and due diligence processes as part of our broader sustainability commitments.



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***Banijay requires contractors, suppliers and business partners to comply with applicable laws and regulations and expects them to conduct their business in compliance with this Policy. Banijay makes training and guidance available to assist these parties in meeting these expectations and is committed to working with them to identify, prevent, mitigate and address adverse impacts on human rights.***

# 1. Goals and Scope

**People and respect for human rights are at the core of Banijay's culture and values and one of our main business principles as stated in our Code of Conduct.**

We believe respecting human rights is of growing importance to our employees, workers, shareholders, investors, customers, and civil society groups. There is both a business and a moral case for ensuring that human rights are upheld across our operations and supply chain.

The Banijay Human Rights Policy is part of Banijay Entertainment's commitment to upholding human rights and recognising their importance and universality.

The Policy details Banijay's commitments and identifies the actions we take to protect human rights. The standards, principles and rules of conduct set out in the Policy are based on the recommendations of the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

This Policy applies to all Banijay Entertainment's workforce.

## 2. Our Commitments

**Banijay Entertainment is committed to upholding internationally recognised human rights, as defined by international standards, wherever it operates.**

**We ensure that our operations comply with the highest standards of protection and, at a minimum, with the provisions of international human rights standards.**

In the event that standards conflict, we will strive to adhere to the spirit of international standards without contravening national laws. Therefore:

- 2.1. We conduct our business in a manner that respects the rights and dignity of all people, complying with all legal requirements.**
- 2.2. We respect internationally recognised human rights as set out in the International Bill of Human Rights and the core labour standards recognised by the International Labour Organization (ILO).**
- 2.3. We respect the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse impacts, including indigenous people; women; minorities, children, LGBTQ+ individuals, people with disabilities, and migrant workers and their families.**
- 2.4. We recognise our responsibility to avoid complicity in human rights abuses and adhere to the UN Guiding Principles OECD Guidelines.**
- 2.5. We treat everyone who works for Banijay fairly and without discrimination.**
- 2.6 We are an equal opportunity employer and do not support or engage in discrimination on any grounds prohibited by national law.**
- 2.7. We respect workers' rights to unionize and engage in collective bargaining and support alternative worker representation where such rights are restricted. Banijay Entertainment fosters dialogue with employees.**
- 2.8. We respect the human rights of people in communities that may be affected by our activities.**
- 2.9. We require suppliers to respect internationally recognised human rights, consistent with our commitments. (Please refer to our Supplier Code of Conduct.)**

## 2. Our Approach

**To ensure compliance, Banijay is committed to assessing and managing human rights risks and impacts through a structured due diligence process, informed by UNGPs and CSRD.**

**3.1. We incorporate the UNGPs into our internal systems, including training, risk assessments grievance mechanisms and policy development.**

**3.2. Our Code of Conduct and Supplier Code of Conduct reinforce our expectations for respecting human rights.**

**3.3. Respect for workers' rights is embedded in recruitment, management and diversity processes. Productions are screened for labour rights risks at development stages.**

**3.4. We engage with communities and stakeholders to identify, prevent, and address adverse human rights impacts.**

**3.5. We integrate human rights into social and environmental impact assessments and conduct targeted modern slavery risk assessments in alignment with local law. (Please refer to our UK Modern Slavery Statement). Sites conduct security risk assessments and action planning.**

**3.6. We operate a grievance mechanism (Speak Up), independently managed to ensure confidentiality. All reported cases are diligently investigated, with findings escalated to the appropriate governance bodies for swift and effective remediation. We prohibit retaliation for reports made in good faith.**

## 4. Monitoring and Metrics

We track performance using indicators such as:

- **Number of grievances** received and resolved
- **Completion rate** of human rights training
- **Remediation outcomes** and follow-ups

These indicators are disclosed in Banijay Group's annual ESG Statement aligned with CSRD reporting.



## 5. Salient Risks

**As a result of its Double Materiality Assessment (DMA), Banijay Entertainment recognises the importance of assessing risks specific to its operating context, including risks related to freelance labour, modern slavery, and discrimination.**

These assessments inform our due diligence priorities on human rights, equal opportunities, wellbeing and working conditions.





## 6. Governance and Implementation

**The Executive Committees and the Management Teams of Banijay Entertainment are responsible for ensuring that the Policy is implemented across all Group sites and businesses.**

This implementation is supported by the Group's initiatives related to ethics, CSR, health and safety, respect at work, equal opportunities, diversity, equity & inclusion, child protection. We operate a responsible procurement programme with supplier risk mapping, ESG criteria in tenders and ongoing monitoring (including site audits).

This Policy is distributed in all countries where we operate and supported by awareness training programmes. It is reviewed annually and updated as needed.

**Policy Owners:**

Anne van Sprang | *Chief Human Resources Officer*

Edouard Minc | *Director of ESG*



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