



SUPPLIERS CODE OF CONDUCT

13 may 2026



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INTRODUCTION

The MFE Group (hereinafter also referred to as the “Group”) structures its development model around compliance with the law and the principles of integrity, responsibility, fairness, transparency and fair competition, in line with the values of sustainable development, respect for human rights, the fight against corruption, environmental protection, occupational health and safety, as well as equality, equity and impartiality.

Fostering a culture of legality and business ethics throughout the entire supply chain is considered a fundamental element of sustainable global development. In this context, collaboration with the suppliers of the Group companies represents a mutually beneficial instrument to promote a fair, transparent and responsible procurement process and to establish solid, trust-based relationships with stakeholders. Accordingly, the MFE Group is committed to establishing and maintaining business relationships exclusively with parties that share and effectively apply the principles and values recognized, promoted and disseminated by the Group, and that comply with the required standards of business conduct.

SCOPE OF APPLICATION

This Supplier Code of Conduct (the “**Code of Conduct**”) applies to all suppliers and business partners of the MFE Group which - in whatever legal form - intend to enter into or have entered into legal relationships, whether for consideration or free of charge, with the companies of the MFE Group, relating, by way of example and without limitation, to the execution of works and/or services, the production, marketing, sale, rental or supply of goods and/or the provision of services, as well as the production or co-production of audiovisual works and/or the licensing of intellectual property rights in audiovisual or other works and/or events and/or personality rights capable of radio, television and/or multimedia exploitation (hereinafter, the “**Suppliers**”).

PURPOSE

The purpose of this document is to describe the minimum requirements and standards of conduct that the MFE Group expects from its Suppliers (including their employees/contractors, subcontractors and sub-suppliers), both during the qualification and accreditation procedures in force from time to time and throughout the entire duration of any contractual relationships that may be established.

In the event of sub-supplies or subcontracting, Suppliers shall be responsible vis-à-vis the companies of the Group for compliance with this Code of Conduct also by their sub-suppliers or subcontractors, as well as for the proper performance of the activities/tasks entrusted to them.

The establishment and/or continuation of commercial relationships between the Group companies and Suppliers is influenced by the latter's effective commitment to applying the principles on which this Code of Conduct is based, as well as by their commitment to promoting and disseminating such principles throughout their supply chain.

Suppliers are, in any case, required to define and implement, in collaboration with the companies of the MFE Group or at their request, initiatives aimed at ensuring continuous improvement in the areas of responsible sourcing and sustainable development.

CONTENTS

The Code of Conduct constitutes the set of principles and values characterizing the company's ethical culture that must inspire the strategic thinking and conduct of the corporate activities of the MFE Group and of all Suppliers who have or intend to have relations with it.

The areas that the MFE Group considers of primary importance for the supply chain and in respect of which it requires Suppliers to assume specific responsibilities, include:

- **Ethics and Compliance**
- **Human Rights, Diversity and Inclusion**
- **Health, safety and environment**
- **Accounting control and transparency**
- **Intellectual property protection**
- **Privacy, confidentiality and cybersecurity**

The principles and standards of conduct set out in this Code of Conduct complement those provided for in the Group's Code of Ethics, in the MFE Policies applicable to Suppliers¹ and, more generally, in the compliance programmes adopted by the Group companies or in other documents relating to Suppliers, and do not amend the contractual obligations assumed by the latter from time to time.

This Code of Conduct forms an integral and substantial part of all agreements entered into from time to time between Suppliers and the companies of the MFE Group. It is published on the MFE Group's website (<https://www.mfemediaforeurope.com/>), in the dedicated sections of the Group companies' corporate intranet, where available, and on the Supplier-dedicated portal.

¹ Reference is made, by way of example, to the Human Rights Policy, the Anti-Corruption Policy, etc.



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ETHICS AND COMPLIANCE

ETHICS AND COMPLIANCE

In carrying out its activities, the Group is guided by the ethical principles commonly recognised in the conduct of business, such as loyalty, integrity, legality, fairness, transparency and fair competition, promoting compliance with all laws and regulations applicable to the MFE Group, and condemns the use of unlawful or improper conduct to achieve the economic objectives of the Group companies, also in order to safeguard the Group's assets and corporate image. This applies to all the countries MFE Group operates.

In this context, Suppliers are required to:

- operate in full compliance with the law, observing all applicable regulations in the countries in which they operate and, where possible, the best standards recognised in the relevant market;
- comply with the provisions of the MFE Group's Code of Ethics, as well as with the MFE Policies applicable to Suppliers and, more generally, with the compliance programmes adopted by the Group companies or with other documents relating to Suppliers;
- carry out its activity, refraining from anti-competitive behavior in the markets in which it operates and applying, in the choice of its suppliers, sub-suppliers and/or subcontractors, the same criteria of impartiality, transparency and fairness that inspire the MFE Group;
- promptly report any situation that is or may represent an actual, potential or perceived conflict of interest with the MFE Group companies or that, in any case, may interfere with the ability to make impartial decisions²;
- not to unduly interfere with the accreditation and qualification procedures of Suppliers, the award or negotiation of contracts or the authorization of subcontracts, by communicating non-transparent, false or misleading information or omitting relevant information that may influence decision-making processes;
- maintain a rigorous and collaborative approach, acting according to diligence and good faith and respecting the contractually assumed commitments;
- promote transparency and accountability in the conduct and administration of business, including through an adequate and effective internal control and risk management system;
- not to practice or tolerate any form of corruption, public or private³, both in general and in the context of its activities and in order to obtain contractual relationships with our Group companies;
- not engaged in conduct aimed at obtaining improper or illegitimate advantages or improperly influencing the ability of MFE Group employees to make sound, impartial and objective decisions in the best interests of the Group;
- to prevent any form of discrimination with regard to gender identity, age, race, ethnicity, language, nationality, sexual orientation, physical abilities, religious beliefs, political and trade union opinions, social background, and any other circumstance relating to the personal sphere;
- refrain from accepting, receiving, making, directly or indirectly, for himself or for others, pressures, recommendations or reports that may cause prejudice to the companies of the MFE Group or undue advantages for himself, for the Group or for third parties.

² This also includes situations where a Supplier is aware, or should have been aware, of the fact that a director, manager, employee of the MFE Group companies (or their family members) has a direct or indirect financial, economic or personal interest in the business, company or corporate structure of that Supplier.

³ The concept of corruption includes any activity that involves the giving, offering or promising, granting, requesting or accepting of an economic advantage or any other benefit in order to induce or reward illegal behavior (i.e. illegal, unethical or contrary to one's duties) in both the private and public sectors. It includes passive, active bribery and so-called *facilitation payments*.



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HUMAN RIGHTS, DIVERSITY AND INCLUSION

HUMAN RIGHTS, DIVERSITY AND INCLUSION

The MFE Group conducts its activities in compliance with universally recognized human rights as essential and non-negotiable values of its corporate culture and business strategies, promoting and supporting, in all relationships with its stakeholders, the protection of fundamental human rights as provided for by the applicable laws and regulations in force from time to time and in accordance with applicable international standards.

The MFE Group recognises the centrality of people as a key factor for business success and growth and promotes a fair and inclusive working environment based on respect for diversity, non-discrimination and equal opportunities, valuing the differences and characteristics of each individual.

Suppliers are therefore required to:

- respect the human rights and dignity of all individuals, preventing any form of intimidation, abuse, inhuman or degrading treatment, and operating in compliance with applicable laws and regulations as well as with relevant international conventions and agreements;
- ensure that working conditions applied directly or by their suppliers, sub-suppliers and/or subcontractors, including in terms of remuneration, are fair and respectful of the moral integrity and personal dignity of individuals, in accordance with the conventions/recommendations of the International Labour Organization (ILO), applicable local legislation and the collective and/or company-level employment contracts in force from time to time;
- provide for working hours and rest periods in compliance with applicable laws, relevant contracts and recognised best practices;
- prohibit forced, unlawful or compulsory labour and ensure that work is performed voluntarily, without threat of penalties or punishment;
- prevent any form of child labour;
- ensure respect for workers' rights and trade union freedoms, including freedom of association and collective bargaining;
- ensure a fair and inclusive working environment, respecting the cultural and professional dignity of each individual and fostering a culture aimed at valuing diversity;
- promote and ensure equal opportunities and equal treatment throughout all phases of the employment relationship and at all levels;
- prevent any form of discrimination based on gender identity, age, race, ethnicity, language, nationality, sexual orientation, physical abilities, religious beliefs, political or trade union opinions, social background or any;
- other personal circumstances; combat offensive, discriminatory, violent or intimidating behavior in the workplace, prohibiting any form of verbal, physical, sexual or psychological violence or harassment.



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HEALTH, SAFETY AND ENVIRONMENT

HEALTH, SAFETY AND ENVIRONMENT

The Group recognizes the importance of health and safety in the workplace, which are fundamental rights of all people working in its organization. In line with the *"Health & Safety General Principles"* adopted by the Group, companies have equipped themselves with Health and Safety Management Systems in the workplace based on internationally recognized standards, adapting company processes in compliance with European Union legislation and with the legislation in force in the countries where the Group operates, technical standards and good practices.

With reference to environmental protection, the MFE Group believes that the environment is a fundamental pillar in the creation of sustainable value and, therefore, strives to ensure that its business activity, in any sector, is carried out with respect and protection of the environment and the territory and in line with the highest standards of eco-sustainability and environmental safety and best operating practices.

Our Suppliers are therefore required to:

- organize and maintain safe and healthy work environments, designed to guarantee the physical and mental health and safety of workers, in compliance with the regulations applicable at all levels;
- operate in full compliance with the provisions contained in the Health and Safety Management Systems in the workplace adopted by the MFE Group companies and with the applicable contractual requirements, constantly verifying and monitoring their compliance both by its personnel and by any sub-suppliers and/or subcontractors;
- adopt a systematic approach in the management of operational activities with reference to health and safety risks, implementing an adequate assessment of the same, defining an adequate system of rules and developing a continuous improvement of company performance in terms of prevention and protection in the workplace;
- adopt effective and efficient prevention and protection measures that reduce accidents, injuries and occupational diseases as much as possible;
- carry out the information and training activities on health and safety provided for by current legislation, concretely and constantly sensitize its resources on the risks and on the prevention and protection measures to be adopted;
- comply with all applicable environmental protection regulations in force in the countries in which they operate, including those relating to waste disposal, also adopting an efficient use of natural resources;
- consider environmental protection as a fundamental aspect in the definition of innovative methodologies for the design, production, processing, recovery and recycling of materials;
- conduct its business by reducing their impact on the environment as much as possible, adopting eco-sustainable solutions - compliant with the highest standards of environmental compatibility and safety - aimed at minimizing the risks associated with global warming, pollution and the depletion of natural resources.



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ACCOUNTING CONTROL AND TRANSPARENCY

CONTROL AND ACCOUNTING TRANSPARENCY

The MFE Group undertakes to ensure that the facts relating to management are represented correctly and truthfully in the accounts of both the individual companies and at the Group level, according to the following principles: *(i)* maximum management correctness; *(ii)* completeness and transparency of information; *(iii)* legal and substantial legitimacy; *(iv)* clarity and veracity of accounting findings according to the applicable legal regulations and company procedures in force from time to time.

Suppliers are therefore required to:

- strictly comply with the accounting, tax and fiscal regulations applicable to them, avoiding any exposure of the MFE Group to disputes and/or claims of any kind by the competent authorities, and refraining from any form of money laundering, anti-money laundering violations or other similar unlawful conduct;
- refrain from any act or omission that directly or indirectly violates statutory principles and/or internal procedures relating to the preparation of accounting records and their external disclosure;
- ensure accounting transparency through the use of truthful, accurate and complete information as the basis for the relevant records, and cooperate to ensure that each transaction and operation with the companies of the MFE Group is promptly and correctly recorded in the relevant accounting system, in accordance with applicable laws and accounting principles in force from time to time;
- verify and ensure, under their own responsibility, including through any parties involved – in any capacity – in the preparation of accounting records, the accuracy and correctness of the data and information provided.



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INTELLECTUAL PROPERTY PROTECTION

INTELLECTUAL PROPERTY PROTECTION

The MFE Group holds and uses important intellectual and industrial property rights and ensures that only original products and works are used in its business activities (both productive and commercial), regularly licensed by the legitimate owners and used in full compliance with the authorizations received.

Suppliers are therefore required to:

- respect and protect the intellectual and industrial property rights of the Group companies and of third parties, and comply with all applicable regulations at local, EU and international level, adhering to the relevant guidelines and best practices adopted in this field;
- exercise the utmost diligence, accuracy and confidentiality when handling data, information, audio-visual content or documents relating to the intellectual and/or industrial property rights of the MFE Group companies or of third parties;
- where artificial intelligence (AI) systems are used in the performance of activities on behalf of the Group companies, comply with the applicable regulations and with MFE Policies on artificial intelligence.



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PRIVACY, CONFIDENTIALITY AND CYBERSECURITY

PRIVACY, CONFIDENTIALITY AND CYBERSECURITY

The personal data of internal and external stakeholders are processed by the MFE Group companies in compliance with the principles of correctness, minimization, data accuracy, integrity and confidentiality, in compliance with all the regulations in force at all levels regarding the protection of personal data and best practices for the protection of confidentiality in the countries where the MFE Group operates, in order to avoid improper and/or illicit uses, also ensuring adequate cybersecurity safeguards through processes and technologies adopted in accordance with recognized standards and international best practices.

Suppliers are therefore required to:

- ensure that the processing of personal data carried out within their premises is performed in compliance with fundamental rights and freedoms, as well as with the dignity of the data subjects, as provided for by applicable laws and regulations;
- comply with the contractually agreed security measures and, where personal data for which the MFE Group acts as data controller are processed, comply with the provisions set out in the data processing agreement pursuant to Article 28 of the GDPR, by identifying and implementing appropriate and preventive technical and organisational security measures in order to avoid risks of destruction, loss, unauthorised access or unlawful processing;
- maintain the highest level of confidentiality – including by adopting the highest standards of information security – with respect to corporate information acquired in the context of, or in connection with, commercial relationships with the MFE Group companies, as well as with respect to any personal data processed;
- ensure the proper use of MFE Group information and compliance with security requirements aimed at safeguarding the confidentiality, integrity and availability of the corporate information assets;
- implement processes and technologies designed to mitigate cybersecurity risks, based on risk assessment criteria and countermeasures consistent with the structure and characteristics of their business;
- promptly inform the MFE Group companies should Suppliers (or any sub-suppliers and/or subcontractors) be affected by data breach incidents and/or cybersecurity attacks having an actual or potential impact on information, on the fundamental rights of data subjects or on the Group's technological systems, providing regular updates on the actions taken and their outcomes.

MONITORING, DUE DILIGENCE AND AUDIT

The MFE Group promotes verification and monitoring activities aimed at fostering Suppliers' compliance with, and effective implementation of, the principles and standards of conduct set out in this Code of Conduct. Such activities contribute to supporting value creation throughout the supply chain and to safeguarding stakeholders' interests. In this context, the Group carries out, where deemed appropriate, assessment, verification and control activities with respect to Suppliers, in order to understand and monitor their risk profile over time.

Suppliers are therefore required to:

- cooperate in a constructive, fair and transparent manner to enable the performance of audit activities, including specific audits, carried out directly by the companies of the MFE Group or by other parties appointed by them;
- define and implement an adequate and effective internal control and risk management system to continuously verify – including within their own supply chain – the consistent application of the provisions of this Code of Conduct and to prevent the occurrence of violations thereof;
- implement effective corrective actions and targeted measures to remedy any irregularities, breaches or abuses, including those committed by their own suppliers, sub-suppliers and subcontractors;
- promptly report, through the dedicated channels made available by the Group companies, any unlawful, improper, unethical or otherwise non-compliant conduct with respect to this Code of Conduct, the MFE Group's Code of Ethics, the MFE Policies applicable to Suppliers and, more generally, the compliance programs adopted by the MFE Group companies or other documents relating to Suppliers, of which they become aware.

DISSEMINATION

Suppliers assume responsibility for ensuring that the principles and rules of conduct set out in this Code of Conduct form the basis of their operations and also inspire all third parties they engage or collaborate with, by promoting their dissemination and adherence through tools and initiatives consistent with their operating practices.

VIOLATIONS

If a Supplier, in the performance of any activity on behalf of the MFE Group, engages in conduct that is not in line with the provisions of this Code of Conduct, appropriate measures may be adopted, proportionate to the seriousness of the violation. Such measures may include, by way of example, termination of the contracts in force, exclusion from further supply or collaboration opportunities, loss of “qualified”/“accredited” supplier status, and exclusion from selection processes, without prejudice to compensation for any damages suffered by the relevant Group companies.

Similar measures may be adopted against Suppliers where the violations concern third parties engaged by them, such as sub-suppliers or subcontractors.

REPORTS

Suppliers may submit – including on an anonymous basis – reports of unlawful, improper, unethical or otherwise non-compliant conduct with this Code of Conduct, with the provisions of the MFE Group’s Code of Ethics, the MFE Policies applicable to Suppliers and, more generally, with the compliance programmes adopted by the MFE Group companies or with other documents relating to Suppliers, by using the dedicated internal whistleblowing channels established by the Group companies and available on the institutional website (www.mfediaforeurope.com/it/governance/compliance). Such channels ensure the strict confidentiality of the identity of the reporting parties and provide them with the highest level of protection against retaliation, prejudice or any form of discrimination or penalisation.

Approved by the Board of Directors of MFE – MEDIAFOREUROPE N.V. at the meeting held on 13/05/2026