

**CORPORATE ETHICAL MAILBOX
DEPLOYMENT AND
MANAGEMENT
PROCEDURE**

1. OBJECTIVE

The objective of the present procedure, in accordance with the principles and values contained in the Code of Ethics of Mediaset España Comunicación S.A. approved by the Board of Directors dated 15 December 2011 (hereinafter "the Code of Ethics") and updated in the Board of Directors of July 24, 2019, is to regulate the process of communicating information relating to the Grupo Mediaset España in relation to possible illegal conduct, or conduct that could contravene the principles and values set out in that Code.

Mediaset España has enabled an ethical mailbox (buzon-etico@mediaset.es), available on the corporate intranet, the use and operation of which is specified in the following headings. It can be used by employees, business partners or any third party to report **suspensions of irregular or inappropriate conduct (complaint channel)**, or as a channel for **Consultations** or **Suggestions** to improve compliance and good corporate governance among all.

The procedure also seeks to ensure that throughout the process the protection of the privacy and confidentiality of all information is effectively ensured for all persons involved in that process.

2. SCOPE OF APPLICATION

This procedure applies to all employees (with indefinite and temporary employment relationship, as well as outsource employees), managers and administrators of Grupo Mediaset España (hereinafter "Mediaset España", or the "Organization") and Interest Groups related to it (suppliers, customers, etc.). Grupo Mediaset España means both the parent company and the companies controlled by it.

The present proceedings have been in force since 1 January 2012 and has been updated as of 24 July 2019. Annex I sets out all the change control carried out on this procedure.

3. COMMUNICATION DUTY

Anyone who has knowledge of information in good faith that, in accordance with the principles of the Code of Ethics, must be communicated to the Organization or who, not informing the Organization, may harm the Organization, have an obligation to communicate it.

In case of doubt, you should always communicate.

4. INFORMATION TO COMMUNICATE

In general, all information that is communicated through the ethical mailbox available on the corporate intranet will be received and analyzed. However, since the purpose is mainly to

inform the Organization of the concurrence of situations and/or facts of interest to the company in order to manage possible risks to the Organization, everything communicated must be in good faith, and will aim to highlight possible unlawful conduct, or contrary to the principles and values of Mediaset España.

In this sense, it may not be used as a means of communication of situations of personal or professional discontent at work, or that has no involvement with or relevance to the Organization.

In addition, all information communicated must be the result of personal conviction that the facts or circumstances to be made known to the Organization are true.

Consultations/complaints which do not meet the requirements and/or that clearly show bad faith in the communication shall be managed in accordance with point 5.1(III) of the present proceedings.

5. ETHICAL MAILBOX COMMUNICATIONS RECEIVED MANAGEMENT PROCEDURE

5.1 REPORT MANAGEMENT

I) Communication

Any employee, manager, administrator or interest group of Mediaset España that has well-founded suspicions of the existence of illegal practices, contrary to the principles and values of the Code of Ethics, or to ethics and good faith in business, must communicate this concern, circumstance or fact to the Organization through the ethical mailbox, available on the corporate intranet.

Examples of these practices include:

- Bad financial and/or accounting practices or that do not align with IFRS and NPGC.
- Inappropriate or inappropriate use of accounting and financial information
- Alteration or misuse of management, accounting and/or financial systems.
- Falsation of accounting and financial information or concealment thereof.
- Fraud, bribery and/or bribery.
- Legal and regulatory non-compliance.
- Conflicts of interest.
- Hazardous activities for occupational health and safety.
- Conduct of vexing or humiliating treatment.
- Discrimination in any form.
- Any other activity that contravenes the Code of Ethics of Mediaset España.

The correct and complete privacy protection of the information communicated and the persons involved will be adequately guaranteed and ensured.

No one can be punished, belittled in any way—even if it is revealed at the end of the investigation that suspicions were wrong—for having communicated facts or circumstances that in good faith thought he should bring to the knowledge of the Organization. In this sense, no retaliation or unfair or discriminatory treatment is permitted or tolerated, and the appropriate sanctioning regime applies in the case of behaviours similar to that described.

The whistleblower will be informed that his identity will not be disclosed to third parties, the person reported, or the management of the reported employee.

It will also be made known that in certain cases it will be necessary to disclose its identity to the relevant persons as a result of the investigation process carried out by the Organization following its complaint.

The complaint must be individual, allowing it to be anonymous or not, at the request of the complainant. In the event that several persons become aware of any irregularities, facts or circumstances and wish to communicate this information to the Organization, they must communicate this incident in a unitary manner through the ethical mailbox, available on the corporate intranet.

Three months after the data is entered, the reporting system will be suppressed, unless the purpose of the storage is to leave evidence of the functioning of the model for preventing the commission of crimes by the legal person. Complaints that have not been made may only be anonymised, without the application of the blocking obligation provided for in article 32 of the Organic Law on Data Protection and Guarantee of Digital Rights (LOPDGDD).

After the period referred to in the preceding paragraph, the data may continue to be processed by the relevant body, not being kept in the internal reporting information system itself.

II) Information management

The Compliance and Prevention Unit will analyze the information received.

All complaints received by the Compliance and Prevention Unit will be handled in accordance with the general complaint investigation procedure below.

Upon receipt of a complaint, the Compliance and Prevention Unit will analyze and record the information and decide whether to initiate the investigation of the complaint. In the event that the Compliance and Prevention Unit can investigate the complaint, the procedure will be as follows:

- 1) The Compliance and Prevention Unit will agree on the initiation of the investigation by communicating it to the appropriate persons and the Human Resources Department if it deems appropriate.

In any case the person reported will be informed that he is being investigated in reference to the following aspects:

- You have been denounced for an alleged violation of the Code of Ethics or any of the rules and/or procedures of Mediaset España.
- The facts he's accused of.
- Departments and services that could receive the report within the Organization (including departments of other companies that are part of the Grupo Mediaset España).
- That the data are being processed and guarded in accordance with current data protection legislation in the most scrupulous confidentiality as well as how you can exercise your rights of access and rectification. The data will be the subject of high-level security measures and will be declared to the AEPD.
- The possibility of canceling the data after a period adjusted to the investigation carried out by the Compliance and Prevention Unit (and at most to the processing of judicial proceedings arising from the investigation carried out, if any).

However, the Organization's reporting obligation may be delayed where there is a risk that such information will jeopardize society's investigative capacity in order to prevent the destruction or alteration of evidence.

The suspension of the duty of communication to the complainant being investigated will last for as long as is strictly necessary to carry out appropriate investigations and ensure relevant evidence and in any case shall not exceed three months from receipt of the complaint in the Compliance and Prevention Unit.

- 2) The Compliance and Prevention Unit will take appropriate measures and actions to fully and adequately investigate the reported facts, with particular emphasis on determining the veracity of the facts.

In any event, such measures shall observe the most scrupulous confidentiality with respect to all parties concerned.

Measures that can be taken by the Compliance and Prevention Unit include, but are noted:

- Arrange interviews with the people involved.
- Require evidence to support the facts reported for study.
- Access and review all information regarding the professional relationship of those involved with the Organization, always with respect to the data protection and privacy laws of those involved.

The investigation process will take up to 6 months from the day the Compliance and Prevention Unit received the complaint.

- 3) Upon completion of the investigation process, the Compliance and Prevention Unit shall communicate the findings found therein to the Human Resources Department if necessary, through a report explaining and detailing:
- Who have been the people involved.
 - What have been the reported facts or circumstances.
 - How the research has been developed and what the measures and actions used have been.
 - What evidence has been found (to be attached to the report).
 - What are the recommendations that the Human Resources Department advises to take forward in order to prevent such events from occurring and strengthen internal control.
- Based on this information, the Compliance and Prevention Unit will make the appropriate decision.

In cases where, initiated investigations by the Compliance and Prevention Unit, during the investigation process a point is reached where for reasons outside that Unit (such as the refusal of one of those involved to hold interviews, the lack of certain or sufficient evidence, etc.) the process cannot be continued, the investigation shall be immediately suspended and the case referred to the relevant Bodies of the Organization.

Once the report is approved by the Compliance and Prevention Unit, the data will be kept for 6 months. At the end of this period the data will be destroyed (without prejudice to the reporting requesting this measure in advance).

The reports and measures taken will be reported to the Audit and Compliance Committee at the regular meetings established.

In complaints concerning group administrators, the Compliance and Prevention Unit shall simply take note of the complaint in order to keep an up-to-date register of the complaints and, without any action or investigation, shall forward the complaint in its entirety to the Audit and Compliance Committee as soon as possible and in writing.

In the case of the Audit and Compliance Committee, instruct the Compliance and Prevention Unit to investigate the reported facts, it shall carry out such tasks in accordance with the reporting procedure.

In these cases the investigation process will last for as long as indicated by the Audit and Compliance Committee and in any case no more than the time limit set out in the general procedure.

III) False or bad faith complaints

Complaints that from the first moment or after the start of their analysis are sufficiently proven to be false or intended to cause harm and are therefore inspired by bad faith will not be subject to further investigation, will result in appropriate disciplinary sanctions for whistleblowers.

In such cases, the Human Resources Department shall be notified to take appropriate measures and/or sanctions in accordance with the rules and procedures of the Organization.

5.2 MANAGING CONSULTATIONS AND SUGGESTIONS

Any queries or suggestions for the improvement of the Crime Prevention and Detection Model of Grupo Mediaset España will also be made through the address: buzon-etico@mediaset.es available on the corporate intranet.

Through this mailbox, you can consult or report issues associated with compliance with the Code of Ethics anonymously or personally. The correct and complete privacy protection of the information communicated and the persons involved will be adequately guaranteed and ensured.

You can also contact us at the following postal address:

Compliance and Prevention Unit
Mediaset España Comunicación, S.A.
Calle Fuencarral to Alcobendas, No. 4
28049 Madrid
Spain

The Compliance and Prevention Unit will assess the inquiries and suggestions received and respond to the data subject thereof.

In the case of suggestions or proposals, depending on the reasonableness and potential value that such suggestion or proposal brings to the Crime Prevention and Detection Model, associated action plans will be developed that will be promoted by the Unit.

6. MEDIASET SPAIN'S RIGHT OF COMMUNICATION

Mediaset España reserves the right to inform the Public Authorities of any information that has criminal relevance in order to be properly investigated in compliance with the duty of collaboration with the inspectorate or supervisory activity of the Public Administrations and the Judiciary.

ANNEX I: CHANGE CONTROL

CHANGE CONTROL				
Edition		Author	Summary of changes	Approved
N °	Approval Date			
0	01/01/2012	Compliance and Prevention Unit	Procedure Generating	Yes
1.0	13/05/2019	Compliance and Prevention Unit	Updated to GDPR	Yes
2.0	24/07/2019	Compliance and Prevention Unit	Adequacy UNE 19601	Yes