

**PROCEDURE FOR THE USE AND
MANAGEMENT OF THE
CORPORATE ETHICAL MAILBOX**

1. OBJECTIVE

The objective of the present procedure is to regulate the process of communicating, analysing and resolving all information received through the Ethical Mailbox set up by the Mediaset España Group in relation to possible illegal behaviour or conduct or that could contravene the principles and values set out in the Group's Code of Ethics, approved by the Board of Directors on 15th December 2011 (hereinafter the “Code of Ethics”) and subsequently updated.

The Ethical Mailbox (buzon-etico@mediaset.es) is accessible through the corporate website to facilitate its use by Group employees, as well as third parties and business partners, in order to establish a direct communication channel to report **suspicions of irregular or inappropriate conduct (complaint channel)**, or as a channel for **consultations** or **suggestions** to improve regulatory compliance and good governance among all the companies that make up the Mediaset Group.

The procedure also aims to ensure that the privacy of the persons involved is protected and the confidentiality of the information provided is effectively ensured throughout the process.

The present procedure is adapted to the provisions of the European Directive (EU) 2019/1937 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL dated 23rd October 2019 on the protection of persons who report breaches of Union law.

2. SCOPE OF APPLICATION

This procedure applies to all employees (with indefinite and temporary employment contracts, as well as temporary employment agency employees), managers and administrators of Mediaset España Group (Mediaset España Group means the parent company or any of its subsidiaries where there is effective control) and Stakeholders related to it (suppliers, customers, etc.).

The present procedure has been in force since 1st January 2012 and has been updated as of 18th October 2021. Annex I lists all updates made to this procedure.

3. DUTY TO REPORT

Anyone who has reasonable knowledge of any kind of act or fact that could contravene the principles and provisions of the Code of Ethics, must report it to the Organisation.

In case of doubt, you should always report.

4. KEY ASPECTS ASSOCIATED WITH THE ETHICAL MAILBOX

4.1 REPORTABLE AND NON-REPORTABLE INFORMATION

The Ethical Mailbox is an instrument that should not be used indiscriminately, but only for the purposes for which it was conceived, as described below:

I) Reportable information:

Any breach or non-compliance with the Mediaset Group's Code of Ethics and the rules contained therein are events that can be reported through the channel, including (i) any breach of legal regulations, especially the Spanish Criminal Code and the Spanish Constitution; and (ii) any obstacle to the development of internal or external auditing processes.

The following is a list of possible areas where, as a guideline, reportable behaviour, actions or events could occur in the event of any breach of applicable legislation or non-compliance with the principles and values described in the Code of Ethics, such as, among others, the following:

1. Human rights.
2. Equality, dignity and respect.
3. Occupational health and safety.
4. Appropriate use of the group's assets and IT systems and information technology.
5. Protection of the environment.
6. Work-life balance.
7. Conflict of interest.
8. Gifts, presents and compensation.
9. Protection of privacy and classification of confidential information.
10. Corruption and bribery.
11. Relations with the Public Administration.
12. Fair competition and antitrust.
13. Management of grants and donations.
14. Intellectual property.
15. Tax and accounting obligations.
16. Misconduct in the stock market.

It may also be used for consultations or suggestions for improvement within the scope of regulatory compliance and good governance of the companies that make up the Mediaset Group.

II) Non-Reportable information:

The Ethical Mailbox must not be used to report situations of mere personal or professional dissatisfaction at work or events that have no significance for the Organisation.

Communications, consultations or complaints that do not meet these requirements shall be handled in accordance with the provisions of point 4.5. of this procedure.

The Mediaset Group provides all parties obliged to comply with the Code of Ethics of this reporting channel a suggestion mailbox to resolve any doubts that may arise regarding the application and operation of these instruments: buzon-etico@mediaset.es

4.2 GOOD FAITH COMMUNICATIONS

Communications sent through the Ethical Mailbox must always be in good faith, with good faith being understood to exist in the following cases:

- When it is based on facts or indications from which an anomalous fact or irregular or illegal behaviour may reasonably be inferred.
- When it is carried out with no intention of revenge, of causing harm at work or in the professional sphere, or of damaging the honour of the person reported or of a third party.

4.3 PROTECTION AND CONFIDENTIALITY OF THE WHISTLEBLOWER ON COMMUNICATIONS MADE THROUGH THE ETHICAL MAILBOX

The Mediaset Group shall provide due protection to all persons who make a report in good faith and in accordance with the rules contained in this Procedure.

No one shall be penalised, discriminated against, belittled or harmed in any way for having reported facts or circumstances that, in good faith, he/she believed should be brought to the attention of the Organisation, even if at the end of the investigation it is revealed that the suspicions were wrong.

Mediaset's Ethical Mailbox is a tool whose objective is to enable a secure and confidential communication channel so that any person can report any event with full confidence that the absolute confidentiality of the reporting person will be respected.

All complaints submitted through this mailbox may be anonymous, and it is optional for the whistleblower to include data that allows him/her to be identified through the reporting form provided, thus guaranteeing his/her anonymity during the process.

The correct and complete privacy protection of the information reported and the persons involved will be adequately guaranteed and ensured, complying at all times with the provisions of Spanish Organic Law 3/2018, dated 5th December, on Data Protection and Guarantee of Digital Rights ("LOPDGDD") and Regulation (EU) no. 2016/679, dated 27th April 2016 (hereinafter, "GDPR").

The whistleblower will be informed that their identity will not be disclosed to third parties, the person reported, or the management of the reported employee. It will also be made known in advance, and always with their previous consent, if in certain cases it is necessary to disclose their identity to the relevant persons as a result of the investigation process carried out by the Organisation following the report.

If the data contained in the reporting systems were to be transferred to a third-party company for the purpose of investigating the reported information, a disclosure of data will take place, of which the affected party, both the reporting person and the person against whom the complaint has been lodged, will be duly informed. In the event of transferring their data to third parties outside the European Union, we will only do so if we are entitled to do so, and when there is an adequacy decision of the European Commission or in compliance with the guarantees set out in articles 44 to 50 of the GDPR.

4.4 CONSEQUENCES OF FILING A COMPLAINT FOR THE PERSON REPORTED

If the facts investigated are deemed to be true and the existence of irregular or unlawful conduct is established, the subject of the complaint may be sanctioned in accordance with the corresponding sanctioning measures contemplated in the Collective Bargaining Agreement in force and the applicable employment regulations.

The Mediaset Group may also bring the facts to the attention of the relevant judicial authorities if it deems it necessary.

4.5 FALSE OR BAD FAITH COMPLAINTS

The Mediaset Group's Ethical Mailbox must be used in a responsible manner. The reporting of false facts or facts that do not conform to this Mailbox's principles of use could represent a breach of the good faith that should govern working relationships and could lead to disciplinary action.

If, after the appropriate analysis, it can be concluded that the facts reported are manifestly false and that the complaint has been made in clear bad faith: (i) the complaint will be closed, with the investigation ceasing and (ii) this circumstance will be reported to the Human Resources Department so that it may adopt the measures applicable in accordance with the Organisation's rules and procedures.

5. MANAGEMENT PROCEDURE FOR COMMUNICATIONS SENT TO THE ETHICAL MAILBOX

5.1 MANAGEMENT OF COMPLAINTS

I) Reporting the information

The whistleblower must fill in the complaint form when accessing the Mailbox, so that sufficient information can be obtained on the suspicious facts or activities for subsequent analysis and investigation. This form can be accessed through the corporate intranet, in the case of employees, or through the corporate website at the following address: <https://www.mediaset.es/inversores/es/gobierno-corporativo.html>

In order to facilitate the whistleblower's use of the Mailbox, as well as the correct understanding of the facts that can be reported, the form includes an introductory text reminding the user of the purpose of the mailbox, and stressing relevant aspects such as the need to act in good faith, the possibility of anonymity and protection against any reprisals or discrimination.

The following information would be required on the form:

- Name and surname of the whistleblower (optional if anonymity is chosen).
- Contact telephone number or e-mail address (optional if anonymity is chosen).
- Identification of the reported party (specific field indicating the name or sufficient data to determine who the reported party or parties are, and which will allow the investigation process to begin).
- Description of the facts through a text field.
- Date or approximate period of the reported facts.
- Possible documentation that may be attached to the complaint to complete or support the reported facts: e-mails, photographs, messages, social networks, etc.
- Identification of other areas or persons affected by the facts/behaviour.

Before sending the form and once the above points have been completed and, thus, before formalising the complaint, you must confirm your acceptance of the data protection clause contained in the document, which describes the rights of the whistleblower in relation to the processing of the personal data included in the complaint (processing, rectification, deletion, opposition, etc.), in compliance with the legislation in force in this area.

The form may be corrected or deleted even after the complaint has been sent.

The complaint must be individual, with the possibility of it being anonymous or not, to be chosen by the whistleblower. In the event that several people are aware of the same fact or circumstance that should be reported to the Organisation, each of them must do so individually through the ethical mailbox.

Three months after the complaint has been made through the ethical mailbox, it will be deleted, unless it is necessary to keep it in order to provide evidence of how Mediaset España's crime prevention model works. Complaints that have not been followed up may only be recorded in an anonymous format, without the blocking obligation provided for in Article 32 of the Organic Law on Data Protection and the Guarantee of Digital Rights (LOPDGDD) being applicable.

Once the period mentioned in the previous paragraph has elapsed, the data may continue to be processed by the body to which it corresponds, without being stored in the internal complaints information system itself.

II) Handling of the complaint or information received

The Compliance and Crime Prevention Unit will analyse the information received through the Mailbox, with two of the Unit's members being the direct recipients of the complaint.

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

Once a complaint has been received, the two recipients of the complaint will share the information reported through the Mailbox with the rest of the Compliance and Prevention Unit and, after a preliminary analysis, will jointly decide whether to initiate an investigation of the complaint, depending on whether the facts in question are considered "reportable" as mentioned in section 4.1.1). In the event that the Compliance and Prevention Unit considers that the complaint should be investigated, the procedure shall be as follows:

- 1) The Compliance and Prevention Unit shall agree to begin the investigation, notifying the appropriate persons and the Human Resources Management if necessary.

In any case, the reported person shall be informed of the following aspects:

- That he/she has been reported for an alleged violation of the Code of Ethics, of any of Mediaset España's rules and/or procedures or of the legislation in force.
- Of the facts of which he/she is accused.
- Of the departments and services that could receive the report within the Organisation (including departments of other companies that are part of the Mediaset España Group).
- That the data is being processed and stored in accordance with current data protection legislation, in the strictest confidence, as well as the way in which they may exercise their rights of access and rectification. The data will be subject to high-level security measures and will be declared to the AEPD if required.

- Of the possibility of cancelling the data after a period adjusted to the investigation carried out by the Compliance and Prevention Unit (and at the latest to the processing of the legal proceedings arising from the investigation carried out, if applicable).

However, such information shared with the person against whom the complaint has been lodged may be delayed as a precautionary measure where there is a risk that it could compromise the investigation, in order to avoid the destruction or alteration of evidence.

The precautionary suspension of the duty to inform the person reported shall be maintained for the time strictly necessary to carry out the appropriate investigations and secure the relevant evidence and, in any case, shall not exceed three months from the receipt of the complaint by the Compliance and Prevention Unit.

- 2) The Compliance and Prevention Unit shall take the appropriate measures and actions to complete the investigation and acquire sufficient certainty as to its veracity and relevance.

In any event, such measures shall observe the strictest confidentiality with regard to all parties involved.

The measures that the Compliance and Prevention Unit can adopt include but are not limited to the following:

- Arrange interviews with the persons involved.
- Request evidence to support the facts reported in order to analyse it.
- Access and review all information relating to the professional relationship of those involved with the Organisation, always respecting the data protection and privacy laws of those involved.

The investigation process will last a maximum of 6 months from the day the Compliance and Prevention Unit first received the complaint.

- 3) Once the investigation process has been completed, the Compliance and Prevention Unit shall formalise its findings in a report which shall explain and detail:

- The acts or facts reported.
- The people involved.
- How the investigation was carried out and what measures and actions were taken.
- What evidence was found (to be attached to the report).
- What recommendations have been made to prevent a recurrence and to strengthen internal control.

If, as a result of the investigations, it is concluded that the facts reported do indeed represent a breach of the Code of Ethics principles, or an actual offence, the Unit may propose the adoption of disciplinary measures, for which purpose it shall send the Report to the Human Resources Management, which shall apply the applicable disciplinary measures in accordance with the rules and procedures of the Organisation.

At the same time, appropriate legal action may be taken against the person or persons responsible for the proven acts.

In those cases in which, during the investigation process, a point is reached where for reasons beyond the Unit's control (such as the refusal of any of the parties involved to hold interviews, lack of certain or sufficient evidence, etc.), the process cannot continue, the investigation shall be immediately suspended and the case shall be referred to the appropriate Bodies within the Organisation.

Once the report has been 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 prior request of the data subject).

The Reports resulting from the complaints received and the possible measures adopted will be reported to the Audit and Compliance Committee for their information, as well as to Senior Management in order to make Directors aware of serious incidents and to identify possible risks or similar situations that require preventive measures or corrective actions.

In the case of complaints relating to directors of any of the Mediaset Group companies, the Compliance and Prevention Unit shall simply take note of the complaint in order to proceed to its appropriate registration and, without any action or investigation, shall forward the complaint to the Audit and Compliance Committee as soon as possible and in writing.

In the event that the Audit and Compliance Committee instructs the Compliance and Prevention Unit to investigate the reported facts, the latter shall carry out such tasks in accordance with the complaints handling procedure.

In these cases, the investigation process shall last for the period of time indicated by the Audit and Compliance Committee, while in any case respecting the time limit established in the general procedure.

5.2 MANAGEMENT OF ENQUIRIES AND SUGGESTIONS

Any enquiries or suggestions for the improvement of the Mediaset España Group's Crime Prevention and Detection Model can also be made via buzon-etico@mediaset.es or via the corporate intranet, in the case of employees, or via the corporate website at the following address: <https://www.mediaset.es/inversores/es/gobierno-corporativo.html>.

Such enquiries or suggestions may be made anonymously or not and, in the latter case, the correct and complete protection of the privacy of the information reported and the persons involved shall be adequately guaranteed and ensured.

The Compliance and Prevention Unit will assess all enquiries and suggestions received and respond to the person concerned.

In the case of suggestions or proposals, depending on their reasonableness and potential value to the Crime Prevention and Detection Model, associated action plans will be drawn up and promoted by the Unit.

6. CONFLICTS OF INTEREST

The filing of a complaint that directly affects persons who may be actively involved in the management of the complaint, i.e., one or more members of the Compliance and Crime Prevention Unit, shall automatically exclude them during the entire process of investigation and analysis until it is resolved, in order to avoid any type of conflict of interest, and to guarantee the objectivity and independence of the actions carried out by the Unit.

MEDIASET <i>españa.</i>	Procedure for the use and management of the corporate ethical mailbox	
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ANEXO I: CONTROL DE CAMBIOS

CHANGES				
Edition		Author	Summary of modifications	Approved
Nº	Date of approval			
0	01/01/2012	Compliance and Prevention Unit	Creation of the procedure	YES
1.0	13/05/2019	Compliance and Prevention Unit	Updated to GDPR	YES
2.0	24/07/2019	Compliance and Prevention Unit	Adaptation to UNE 19601	YES
3.0	18/10/2021	Compliance and Prevention Unit	Revision in line with EU Directive 2019/1937 and best practices	YES