

REGULATORY COMPLIANCE POLICY

MEDIASET *españa.*

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1. OBJECT AND SCOPE

The object of this document is to require compliance with the criminal legislation within Mediaset España Group (hereinafter, “Mediaset España” or the “Group”); prohibit the commission of criminal acts or behaviour contrary to the principles, values and rules contained in the Group's Code of Ethics; and establish the defined organization and management procedures that constitute surveillance and control measures aimed at preventing and avoiding any criminal action. These procedures are aimed at guaranteeing, at all times, the legality of professional activities carried out by all workers and managers of the company in matters of prevention of criminal risks.

This Policy is framed in this regulatory context, the objective scope of which includes all the processes, departments and sections of Mediaset España, taking into account the controls established in it, and that are necessary for the detection and prevention of the crimes categorised in the regulations.

The Regulatory Compliance Policy is applicable to all Group companies, located in national territory and over which effective control is exercised. The main activities of the Group under the scope of this Policy are:

- The indirect management of the public television service in accordance with the terms of the concession granted to the Company, within the limits of Law 10/1988, of May 3, on Private Television.
- The management and operation of radio, television or any other means of communication services in any of their forms of provision, distribution or broadcast, whether by land, satellite, cable or Internet, analogic or digital.
- The creation, acquisition, production, co-production, editing, filming or recording, reproduction, broadcast, dissemination, distribution, marketing and exploitation in any form of any works or recordings, sound, audiovisual, written or computer, as well as the rights related to such works.
- The organization and production of cultural, sporting, musical or any other type of events or events, as well as the acquisition and exploitation in any form of all kinds of rights that fall on such cultural, sports, musical or any other type of events or events.
- The creation, acquisition, commercialization and exploitation in any form, directly or indirectly, of trademarks, patents and any other type of industrial, intellectual or image property rights, as well as any objects, models or methods likely to serve as support for the exploitation of the above rights.

- The realization and execution of advertising projects and tasks related to the contracting, intermediation, and dissemination of advertising messages in any of its possible modalities, through any means of dissemination or social communication.
- The performance of activities related, directly or indirectly, to marketing, merchandising and any other commercial activities.
- The provision of advisory services, consulting, research, management, administration, installation, agency, representation, market studies related to the activities outlined above, as well as the purchase, sale and exploitation of movable and immovable property.

In the field of criminal risk prevention, it should be noted that Mediaset España has a robust and solid Crime Prevention Model, which is evolving to adapt to the Group's reality and regulatory changes, in order to ensure effective mitigation of the criminal risks applicable in Mediaset España, as well as ensuring an ethical and compliance culture within the Group, based on the implementation of rules and control procedures that minimize the risk of illegal behaviour.

To this end, the fundamental objectives regarding the prevention of the Group's criminal risk are the following:

- Optimize and encourage the continuous improvement of the Crime Prevention Model.
- Ensure an effective control environment, through periodic reviews, which allows for the adequate mitigation of the criminal risks applicable to Mediaset España, especially focusing on operations or processes that have been identified as a greater potential risk within the scope of criminal risks.
- Strengthen an internal culture of compliance, keeping employees and business partners of Mediaset España informed of the relevance of applying the principles and values of the Organization in activities carried out internally, or on behalf of Mediaset España.
- Keep all employees informed that a violation of the provisions contained in the Code of Ethics and internal regulations may involve the imposition of disciplinary measures.
- To expressly and publicly record the categorical condemnation of any type of illegal behaviour, understanding this not only to contravene the legal provisions, but also to act in breach of the Group's Code of Ethics, which lists the values and principles of the Organization in order to achieve its business objectives.
- Raise awareness and train the company's employees in criminal risks, adapting the contents to the target audience, and using the channels that are considered most efficient for this purpose.

- Supervise the correct functioning of the Model implemented, with its consequent periodic update, either due to organizational changes within the Mediaset Group, or as a consequence of changes in current legislation.

2. THE BASIS OF THE CRIME PREVENTION MODEL

Mediaset España's Crime Prevention Model is the compilation of the elements, procedures and controls existing in the Company that mitigate or prevent the commission of criminal risks. It is mainly formed by the following elements:

- *Code of Ethics*: aims to establish the principles and values which must prevail in any of the Group's activity's, and must be considered as an action guide for its employees, executives and members of the Board of Directors in all their professional relationships, both internally and with third parties. This Code does not include every possible situation that might occur; however, it does reflect the principles that should always inspire the behaviour of all those working in our Organization or for it. Mediaset España's corporate culture is focused on achieving positive results in all areas of the Organization, based on honesty and professionalism at work, compliance with current legislation and corporate responsibility.
- *Compliance and Prevention Unit*: Its main functions are the correct management, supervision and monitoring of the Crime Prevention Model, acting as an autonomous and independent body.
- *Corporate Ethical Mailbox*: Its objective is that any employee, executive, administrator or stakeholder of Mediaset who has well-founded suspicions of the existence of practices contrary to the principles and values of the Code of Ethic, or behaviours that could contravene the current criminal standards, may communicate said circumstance or behaviour to the Organization, as well as queries related to the scope of compliance. The complaint, or consultation, can be sent by any employee or Stakeholder of Mediaset España through the mailbox enabled for this purpose (buzon-etico@mediaset.es).

Any employee, who in good faith has any information that reveals possible illegal conduct, or conduct that is contrary to Mediaset España's principles and values, or information that may harm the Organization if said information is not disclosed to it, has the obligation to communicate it.

If in doubt, it always should be communicated. The person who, in good faith, communicates any notification should be ensured that they will not endure any reprisals, directly or indirectly, for the complaint or communication made and will always be protected by the Managers against any type of retaliation. The management of this Mailbox is absolutely confidential.

The following are some examples of these practices: bad financial and/or accounting practices, improper or inappropriate use of accounting and financial information or concealment of it, fraud, bribery, legal or regulatory breach, conflicts of interest, dangerous activities for health and safety at work, degrading or humiliating behaviours, discrimination in any of its forms, any other activity that contravenes Mediaset España's Code of Ethics.

- ***Crime Detection and Prevention Protocol:*** The objective of this Protocol is to describe the Group's operation in the prevention and control of those operations and/or actions that are susceptible to being considered as a crime, and that may entail the criminal responsibility of the legal person within the terms set forth in the Criminal Code.

Mediaset España has defined a control structure that consists of (i) the Audit and Compliance Committee, as the Board of Directors' deputy body, being the head of Mediaset España's Crime Prevention and Detection Model, (ii) the Compliance and Prevention Unit as a surveillance and control body, with the main responsibility of managing, applying and updating the Crime Prevention and Detection Model, (iii) and the Internal Audit department as responsible for risk management within the organization.

The execution of the control and monitoring tasks related to the Model have been entrusted to the Compliance and Prevention Unit, as set out in the Crime Detection and Prevention Protocol, for having autonomy and independence in terms of both the power of control and the necessary initiative in the present control framework.

In order to ensure maximum effectiveness of their respective activities, the Compliance and Prevention Unit has free access to all the Group's documentation that may be useful. In this regard, those responsible for any area are obliged to provide this Body with any information that they request regarding the activities of the area related to the potential commission of a crime or incident that could be monitored and processed by the Compliance and Prevention Unit.

For the development of this monitoring and control function, the Compliance and Prevention Unit may rely on the collaboration of other Organization's departments, or third-party experts in the field.

3. POLICY BREACHES

The breaches of the provisions of this Policy may be considered as labor offenses and be sanctioned as such in accordance with the typification and graduation of the same regulated in the applicable Collective Agreements, or in current legislation.

Additionally, any activity that violates the Legal System as well as the policies, procedures or internal rules that make up the Mediaset Group Compliance System, may imply that those responsible may be declared as such from a civil, criminal and / or administrative point of view.

4. APPROVAL AND REVIEW

This Regulatory Compliance Policy has been approved by Mediaset España's Board of Directors at its meeting held on July 24th, 2019. From that moment on, it is fully in force.

In order to keep it updated, it will be reviewed at least every two years and, extraordinarily, whenever there are changes in the applicable regulations, or in the structure, or in the activities developed by the Group that require significant modifications. In these events, the Compliance and Prevention Unit will make a modification proposal that will be submitted to the Board of Directors for approval.

CHANGE CONTROL

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Edition		Author	Summary of Modifications	Approved
N.	Date of Approval			
0	July 2019	UCYP	Document creation.	YES
1	December 2021	UCYP	Update (part 1 and 3).	YES